

October 30, 2017

Re: Cannabis Regulations Environmental Review 2017 Santa Cruz County
Attention: Matt Johnston

Matt.Johnston@santacruzcounty.us

Dear Mr. Johnston,

We are writing to you with comments on the Draft EIR for Commercial Cannabis Cultivation and Manufacturing Regulations and Licensing Program. We represent a small rural HOA with 12 members located in the Coastal Zone and immediately abutting the Cotoni-Coast Dairies National Monument and San Vicente Redwoods, together totaling over 15,000 of protected lands. We also collaborated with the Sempervirens Fund to raise funds and protect in perpetuity 151 acres of redwood forest that we collectively own including the headwaters of Mill Creek and old growth and second growth redwoods.

In the midst of our residential lots is a 47 acre parcel zoned "A" (APN # 063-071-28). It also has an Open Space Easement attached to it. It has recently been purchased by owners that are considering cannabis cultivation on the property. While we are not taking a position on cannabis cultivation, we are very concerned with the possible negative impacts that cultivating and/or manufacturing cannabis on this lot would likely generate. We are particularly concerned about fire, security, water and wildlife. We are in an area far from rapid emergency response if 911 is called. We have had mandatory evacuations twice in the last 9 years due to the Martin Fire in 2008 and the Lockheed Fire in 2009. Earlier this month, while the Bear Fire was still burning, there were additional fires on Warnella Road, Western Avenue and Empire Grade, all within a few miles of us. Thanks to Calfire's response all were quickly extinguished. Fire hazard here is high and firefighting challenges are great and due to climate change are likely to become even greater. Minimizing wildfire hazard needs to be a paramount objective of the regulations and licensing program.

We note that the Project and More Permissive Project maps illustrated in Figures 2.3 and 2.4 of the Draft EIR related to eligibility for cannabis cultivation appear to have numerous errors related generally to public parkland and protected conservation land. In addition, the map appears to fail to consider details of APN # 063-071-28 including recognition of the Open Space Easement provisions applicable to this property as well as the fact that sections of it have been carved off and appended to adjacent lots. We request that this map be updated and corrected before final decisions are made on licensure.

The requirements and operations of cannabis cultivation requiring additional electrical wiring and the likely use of other fuels and backup generators in an area with frequent lengthy power outages and surges, all add to the already high risk of fire in a remote rural location like ours. And allowing not just cultivation, but also manufacture on this particular parcel (as well as on other TPZ and Ag parcels in isolated areas with delayed and limited fire response) is of grave concern to us, as this would significantly increase the wild fire hazard on our properties and in the surrounding area. We appreciate the attempts to lessen the impact via regulatory mitigations, but still have a high level of concern for ourselves and our neighbors and the surrounding forest and wildlife and thus hope that cultivation will be limited and manufacturing disallowed in such rural, forested areas.

We are also concerned that the availability of a large cannabis crop and manufactured products could prove a magnet to thieves and that if significant security is added it would be very damaging to the tranquility and character of our neighborhood and, if not, there is a much greater likelihood of crime and we already know that

long delays to get a Sheriff to Bonny Doon are to be expected. Neither option is satisfactory.

Additionally, our HOA has legal easement rights to wells and water supply that serve our Water Mutual Company, but are physically located on the Agricultural Parcel noted above. We are very concerned about the potentially devastating impact that cannabis cultivation and manufacturing could have on both water quality and water quantity. It is critical for us to be able to count on receiving adequate and non-polluted water from our wells. Serious consideration should be given to whether to allow cultivation on parcels with wells used for residential drinking water.

We are also concerned about aesthetic and visual adverse effects such as degradation of the visual setting and neighborhood character, obnoxious odors, noise, lighting and hazardous substances. Placement and screening of structures, fences, water tanks, vehicles, etc., may potentially have great impact on the character of neighborhoods and on property values. We hope that all the mitigations discussed are implemented and that a robust process of public/neighbor notification and opportunity for comment are provided around all significant issues/changes, perhaps erring on the side of more rather than less actions that require notification/comment than are noted in the EIR at the outset of implementation.

The requirement for onsite residential units is a critical element of the proposed Program. Ensuring that proper connections to water, power and wastewater management systems exist will help ensure safe and proper management of the entire property. Residential use will also provide additional site security and encourage communication and a shared sense of neighborhood and connection. We strongly support the continued inclusion of this element of the Project.

Last, but by no means least, thanks to our own actions and those of the stewards of the thousands of acres of protected lands adjacent to ours, we have abundant wildlife including mountain lions, bobcats, coyotes, deer, hawks, owls and many others. We also have ancient conifer trees that could readily provide nesting sites for marbled murrelets and raptors. We also live in the midst of important riparian and wildlife corridors. We are very concerned about the impact that more traffic, more noise, less water, increased fire danger and particularly the use of herbicides and rodenticides and other chemicals and fuels could have on the surrounding ecosystem.

Redwood Meadows Ranch is one of the few areas that is well-protected from future development and it would be a shame to introduce all the potential negatives of cannabis cultivation and manufacture here. It is our strong sense that cannabis cultivation, and especially cannabis manufacturing, would much more logically be located in close proximity to emergency services for fire, crime, medical emergencies, etc., where there is a public water supply that is adequate and where workers, suppliers, and products will not have to travel great distances to a remote area to grow and process the product.

Thank you for considering our very significant concerns. We hope your review will consider all of the above issues. Please do not hesitate to contact us if you would like additional information.

Sincerely,

Pamela Koch and Michael Wade
Redwood Meadows Ranch Board of Directors