



# County of Santa Cruz

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## COMMISSION ON THE ENVIRONMENT

701 OCEAN STREET, ROOM 400, SANTA CRUZ, CA 95060-4073

(831) 454-2580 FAX: (831) 454-2131 TDD/TTY CALL - 711

February 8, 2015

The Honorable Bruce McPherson, Chair  
Santa Cruz County Board of Supervisors  
701 Ocean Street, Fifth Floor  
Santa Cruz, CA 95060

Subject: Cannabis Cultivation Choices Committee

Dear Chair McPherson and Members of the Board:

The Commission on the Environment (COE) received a presentation from the Cannabis Cultivation Choices Committee (C4) consultant, Eric Olsen, at its February 3, 2016 meeting. The Commission was able to discuss at length the opportunities and challenges involved in revising the County's existing ordinances covering cannabis cultivation. The Commission also had the opportunity to review the letter written to the C4 Committee by the County Fish and Game Advisory Commission, which is attached for your reference.

The purpose of this letter is to strongly endorse the environmental protection recommendations made by the Fish and Game Commission to the C4 Committee and to add additional recommendations of our own as follows:

- (1) In keeping with the Fish and Game Commission's recommendation to prohibit light and noise pollution from all commercial cultivation operations, the COE recommends that standards to mitigate odor pollution also be adopted.
- (2) The COE recommends that energy audits be required from all licensed cultivation operations.
- (3) The Commission recommends that the County consider licensing incentives that will encourage commercial cultivators to install energy efficiency measures beyond Title 24 requirements and to use renewable energy resources in all operations.

Thank you for your consideration of this issue that impacts the County's environmental resources, public safety and quality of life.

Sincerely,

Greg Pepping, Chair  
Santa Cruz County Commission on the Environment

Attachment: October 27, 2015 County Fish & Game Advisory Commission Letter to BOS

Cc: Cannabis Cultivation Choices Committee (w/o att.)



# COUNTY OF SANTA CRUZ

## FISH AND GAME ADVISORY COMMISSION

701 OCEAN STREET, ROOM 312, SANTA CRUZ, CA 95060  
 (831) 454-3154 FAX: (831) 454-3128 TDD: (831) 454-2123



October 27, 2015

Dear Cannabis Cultivation Choices Committee (C4):

The County of Santa Cruz Fish and Game Advisory Commission advises the Board of Supervisors on any matters pertaining to fish and game in the county, including the natural habitat, wildlife, and environment in general. The Commission also makes recommendations, consistent with the policies and regulations of the California Department of Fish and Wildlife, to the Board of Supervisors concerning expenditures from the County Fish and Game Propagation Fund.

As you likely know, environmental impacts associated with commercial cannabis cultivation have been well documented both locally and state-wide. Effects on fish and wildlife may range widely from food chain effects of pesticide use to excessive water diversion to hydromodification issues associated with improper rural road construction. Our watersheds already face a litany of impacts associated with historic and present land uses and the recent emergence of wide-scale commercial agricultural activity in rural areas of the County compounds this already troublesome situation. Santa Cruz County is a biodiversity hot spot, home to many threatened and endangered plant, animal, and fish species as well as rare and threatened habitat types. These resources deserve special protection, not just for their inherent value, but as community assets.

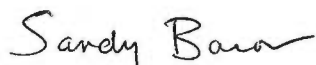
Therefore, we are very interested in your work on the County's medical cannabis cultivation regulations. We have been asked to weigh in on environmental protection issues which the C4 should consider in their development of new County regulations regarding cannabis cultivation. Our commission encourages you to consider that properties zoned A (agriculture) and CA (commercial agriculture) are the most suitable for commercial cannabis crops. But in all cases, we would like to see the following environmental protections:

1. Require proof of valid water rights for surface water diversions serving commercial operations.
2. Require irrigation efficiency water audits and implementation of water conservation best practices for commercial operations.
3. Require all roads associated with commercial operations to meet County and CalFire standards.
4. Enhance riparian protection regulations for commercial operations; 100' for perennial streams, 50' for intermittent streams and 25' for ephemeral drainages.

5. Require preparation of a Farm Plan or Conservation Plan which will guide development and implementation of commercial operations.
6. Require 3<sup>rd</sup> party certification of Conservation Plans and their implementation.
7. Prohibit commercial cultivation in all sensitive habitat areas – including sandhills, riparian corridors and northern maritime chaparral.
8. Request special rule for Santa Cruz County to prohibit conversion of timberland to cannabis cultivation.
9. Dedication of tax revenue on medical cannabis sales to cannabis regulatory program development, regulatory enforcement and mitigation of problem grow sites.
10. Require Santa Cruz County residency for all commercial cultivation operations.
11. Require a notarized cultivation authorization letter from landowners for all tenant-farmer commercial cultivation operations.
12. Prohibit light and noise pollution for all commercial cultivation operations.
13. Encourage organic only cultivation of commercial cannabis cultivation through reduced permit requirements.
14. Require herbicide and pesticide testing for all commercially-derived cannabis.
15. Require chain of custody documentation for all commercially-derived cannabis products sold in Santa Cruz County dispensaries.
16. Require compliance with all other applicable local and state regulations and ordinances.
17. Facilitate use of existing greenhouse facilities that greatly reduce environmental impacts associated with outdoor grows and new cultivation sites while also providing security for growers.

We very much look forward to reviewing the recommendations of C4 and hope that you will provide us with the opportunity to do so prior to their going to the Board of Supervisors. Thank you for your consideration.

Sincerely,



Sandra Baron  
Fish and Game Advisory Commission - Chair

cc: Susan Pearlman - County Administrative Officer; Board of Supervisors; Kristen Kittleson - County Environmental Health Services