

From: [Cheyanne Beasley](#)
To: [BOS](#)
Subject: Cannabis Opposition Letter - Kim Stare Wallace
Date: Friday, October 24, 2025 10:35:45 AM
Attachments: [image008.png](#)
[Opposition to Draft Cannabis Ordinance & EIR.docx](#)

EXTERNAL

Dear Chair and Members of the Board of Supervisors,

Please see the attached letter from Kim Stare Wallace regarding the proposed new ordinances regarding cannabis in the Dry Creek Valley and the Draft EIR.

Thank you.

Sent on behalf of Kim Stare Wallace

Cheyanne Beasley

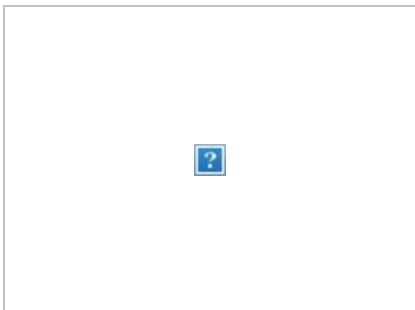
Executive Assistant/Sustainability Manager

707.433.1000 ext. 108 | office

Cheyannej@drycreekvineyard.com

3770 Lambert Bridge Rd.

Healdsburg, CA 95448



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October 24, 2025

Board of Supervisors

County of Sonoma

575 Administration Drive, Room 100A

Santa Rosa, CA 95403

RE: Opposition to Draft Cannabis Ordinance and Environmental Impact Report (EIR) – Concerns for Dry Creek Valley Agricultural Lands

Dear Chair and Members of the Board of Supervisors,

As a member of the Dry Creek Valley Association, owner of Dry Creek Vineyard and a long-standing resident and neighbor in this treasured agricultural region, I am writing to express my strong opposition to the current draft cannabis ordinance and the associated Environmental Impact Report (EIR) being considered by the County of Sonoma. I urge you to *withhold approval of the Draft EIR* and to direct staff to revise the ordinance to better reflect the interests and protections of local residents, rural communities, and the environment.

Dry Creek Valley is a unique and tightly knit agricultural area that has long been defined by its vineyards, open landscapes, and rural character. The draft ordinance, in its current form, threatens to erode this identity. By allowing cannabis cultivation to replace existing crops without neighbor input or adequate land use safeguards—and without any cap on the number of potential grow sites—the County is opening the door to unmitigated impacts on residents, agriculture, and community well-being.

My two greatest concerns are:

1. Cannabis Tourism, Tasting, and Events:

Dry Creek Valley already supports a robust and balanced agricultural tourism economy centered around vineyards and wine. Allowing cannabis-related tourism and events will add a new layer of commercialization that is incompatible with the valley's current scale and infrastructure. Cannabis tourism would bring increased traffic, safety risks, and pressure on rural roads not designed to handle such use. Unlike traditional agricultural events, cannabis events pose unique regulatory, public health, and enforcement challenges that the County is not prepared to manage.

2. Inadequate Setbacks from Property Lines:

The proposed setbacks in the ordinance are far too small to adequately protect neighbors from noise, odor, light pollution, security concerns, and visual blight. Cannabis operations are not passive agricultural uses. They often include security fencing, bright lighting, surveillance cameras, and pungent odor emissions—impacts that do not respect property lines. The County must require significantly larger setbacks and enforceable buffer zones between cannabis cultivation and neighboring homes, properties, and community spaces.

Despite staff's stated goal of increasing compatibility between cannabis operations and nearby neighborhoods, the draft ordinance does little to achieve that balance. In fact, it appears heavily skewed to support industry interests while ignoring the concerns and recommendations of residents who participated in good faith during the public input process.

As outlined by the Sonoma County Neighborhood Coalition, the current EIR and ordinance fail to provide a clear accounting of what, if anything, has been done to protect neighbors. The process has not been transparent or inclusive. Residents asked for sensible regulations, reasonable setbacks, exclusion zones, and limits on commercial cannabis growth in sensitive areas like Dry Creek Valley. These requests were either dismissed or overlooked.

I respectfully ask that you, as our elected representatives, take a step back and reassess the priorities guiding this ordinance. Please require that County staff return to the original intent—protecting the health, safety, and quality of life of Sonoma County residents, not just facilitating commercial cannabis expansion.

Until these protections are included in the final ordinance, I remain firmly opposed to the current draft and urge you to vote **not to certify** the Environmental Impact Report on October 28.

Sincerely,



Kim Stare Wallace
Owner, Dry Creek Vineyard
Dry Creek Valley Association Member and Concerned Resident

From: [Cheyanne Beasley](#)
To: [BOS](#)
Subject: Cannabis Opposition Letter - Kim Stare Wallace
Date: Friday, October 24, 2025 10:44:43 AM
Attachments: [image008.png](#)
[Opposition to Draft Cannabis Ordinance & EIR.pdf](#)

EXTERNAL

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Thank you.

Sent on behalf of Kim Stare Wallace

Cheyanne Beasley

Executive Assistant/Sustainability Manager

707.433.1000 ext. 108 | office

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3770 Lambert Bridge Rd.

Healdsburg, CA 95448



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October 24, 2025

Board of Supervisors

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575 Administration Drive, Room 100A

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ESTABLISHED 1972

DRY CREEK VALLEY

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Until these protections are included in the final ordinance, I remain firmly opposed to the current draft and urge you to vote **not to certify** the Environmental Impact Report on October 28.

Sincerely,

A handwritten signature in blue ink that reads "Kim Stare Wallace". The signature is fluid and cursive, with the first name "Kim" being more prominent.

Kim Stare Wallace
Owner, Dry Creek Vineyard
Dry Creek Valley Association Member and Concerned Resident

From: [Hannah Whitman](#)
To: [BOS](#)
Subject: FW: cannabis vote
Date: Friday, October 24, 2025 2:09:10 PM

Forwarding public comment (does not appear to have been sent to BOS).

From: Mindy Barrett <grnteez@yahoo.com>
Sent: Friday, October 24, 2025 9:12 AM
To: District1 <District1@sonomacounty.gov>; district4 <district4@sonomacounty.gov>; district5 <district5@sonomacounty.gov>; david.rabbit@sonoma-county.org; Chris Coursey <Chris.Coursey@sonomacounty.gov>
Subject: cannabis vote

EXTERNAL

Board of Supervisors,

I would like to encourage you to look deeply into the reports from your staff that has been presented to you. They seem to be skewed only towards the cannabis industry and not particularly with the reality of true scientific facts. Once you enact the recommendations, there will be no going back. The county will be forever damaged as will the residents. Is that what you want your legacy as a BOS to be. There seems to be more negative for the county than positive with the new recommendations.

There is a glut of cannabis already. More county money is going into helping the industry than is coming out to the county.

Why would you rename cannabis as controlled agriculture? This is not a term used in Calif. and the Federal government considers it a controlled substance.

Why would you want Sonoma Co. the only North Bay county to allow outdoor cultivation?

Would you make current permit holders comply to new standards?

Do you have staff to test cannabis?

Will you have additional staff for code enforcement?

Are any of you volunteering to move/live next to a grow?

Driving through Sonoma Co. there is no doubt when you are near a grow. The odor is unmistakable.

The original plan for cannabis stated "commercial cannabis activity shall not create a public nuisance or adversely affect the health or safety of the nearby residents or businesses by creating dust, light, glare heat, noise, noxious gasses, odor smoke, traffic, vibration, unsafe conditions or other impacts, or be hazardous due to the use or storage of materials, processes, products, runoff or wastes" When did this ideal change and were residents allowed to give feedback or vote on this?

Why did the Board align themselves with the cannabis industry and their wants and disregard the well being and quality of life for Sonoma County residents.

Lastly, the comment Supervisor Gore made to several representatives of Franz Valley that cannabis is "farm to table" doesn't fit the definition. Farm to table refers to food. I believe it's quite a stretch to put cannabis in that category. Perhaps this is just a way for the cannabis growers to skip the middleman. Selling directly from their grows can eliminate product inspections and dispensaries. I believe Supervisor Gore should recuse himself from all cannabis discussions and votes. If he is a lobbyist for the cannabis industry, it brings into question the integrity of previous discussions and votes.

Please do not bow to the pressure of the cannabis industry.

Thank You,
Mindy Barrett
Franz valley
Sonoma Co.

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From: [Tuloa Sanchez](#)
To: [BOS](#); [David Rabbitt](#); [district3](#); [district4](#); [district5](#); [Scott Orr](#); [Sita Kuteira](#); hermosillo@sonomacounty.gov
Cc: [Joseph D. Petta](#); [Caleb Hersh](#)
Subject: Cannabis Program Update item on the 10/28 Board of Supervisors agenda
Date: Friday, October 24, 2025 5:08:11 PM
Attachments: [image001.png](#)
[BOS Comment Letter - 10-28-25\(1985266.1\).pdf](#)

EXTERNAL

Good afternoon,

Please see attached Comment Letter from attorney Joseph Petta re Cannabis Program Update item on the 10/28 Board of Supervisors agenda. Exhibits to the Comment Letter can be found [HERE](#).

Best,



Tuloa Sanchez
Legal Secretary
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October 24, 2025

Via Electronic Mail

Members of the Board of Supervisors
County of Sonoma
575 Administration Drive, Room 100A
Santa Rosa, CA 95403
E-Mail: bos@sonomacounty.gov

Re: Agenda # 32, File # 2025-1117: Comprehensive Cannabis Program
Update and Final Environmental Impact Report, Permit Sonoma File
No. ORD21-0004

Dear Members of the Board:

This firm represents Save Our Sonoma Neighborhoods (“SOSN”) in connection with the Sonoma County Comprehensive Cannabis Program Update (“Project”), which includes proposed revisions to the County Cannabis Ordinance (“Proposed Ordinance”). We submit this letter to protest the recommendation of the Sonoma County Planning Commission to approve the Project, and specifically to restate and expand upon our position that the final environmental impact report (“FEIR”) fails to correct the inadequacies of the Draft EIR (“DEIR”). SOSN is joined in these comments by the following community groups based throughout the County:

- Neighborhood Coalition
- Barlow Lane Neighbors
- Bennett Valley Citizens for Safe Development
- Bennett Valley Community Association
- Bennett Valley Grange
- Concerned Citizens of Bloomfield
- Cougar Lane Property Owners
- Friends of Franz Valley
- Friends of Graton
- Friends of the Mark West Watershed

- Gold Ridge Neighborhood Group
- Neighbors for Liberty Valley, LLC
- Neighbors of West County
- No Pot on Purvine
- Morningside Mountain Road Association
- Penngrove Takes Action
- Stewards of Burnside Ridge
- residents of Glen Ellen, Palmer Creek, and Mill Creek

We previously submitted extensive comments on behalf of SOSN regarding the deficiencies in the original DEIR, and comments to the Planning Commission regarding the FEIR's failure to correct, or even to respond to these deficiencies. *See* Attachment A, Comment on the Project DEIR dated July 15, 2025; Attachment B, Comment on Project FEIR dated September 15, 2025. Since those comments remain applicable to the County's analysis of the Project due the County's inadequate responses in the FEIR – and in many cases, County's failure to respond at all – SOSN expressly incorporates its earlier comments and all accompanying exhibits by reference as if fully set forth herein.

The EIR prepared for the Project violates the California Environmental Quality Act ("CEQA"), for all the reasons set forth in our prior comments and below, and therefore does not provide the legal basis for Project approval. The County received copious comments on the DEIR on this project from resource agencies, community members, and technical experts enumerating the EIR's flaws. Unfortunately, the FEIR for the Project fails to correct the EIR's flaws and remains inadequate.¹

As explained in our prior comments, the Project as proposed will have significant, adverse impacts on both the natural and the human environment in Sonoma County. The Project would result in potentially devastating effects to both the natural and human environment countywide, including but not limited to: local hydrology and water

¹ The FEIR was released on September 3, 2025, allowing only limited time to review the hundreds of pages long document prior to the deadline for comments for the September 17, 2025 Planning Commission meeting. Considering these time constraints, our letter of September 15, 2025 provided high-level comments and several examples of the document's deficiencies. Our comments here expand on the comments provided on September 15.

quality; special status species, for both terrestrial and aquatic wildlife, and their habitat; local traffic, air quality, and noise.

As explained further below, the FEIR fails to correct the flaws in the DEIR. The Board should not certify the EIR until a revised EIR is prepared that complies with CEQA. If the Board decides to move forward with ordinance amendments, the Board should adopt the EIR's Alternative 2, which would only allow commercial cannabis uses within the commercial and industrial zoning districts, would limit cultivation to indoors only, and would prohibit events in all zones. The DEIR identified this Alternative as one of two environmentally superior alternatives to the project.

I. The FEIR Fails to Respond to Comments on the EIR Raised by the California Department of Fish and Wildlife Regarding Effects on Biological Resources, and Does Not Adequately Address Effects on Biological Resources.

A lead agency must respond to all comments on the DEIR. Pub. Res. Code § 21091(d); CEQA Guidelines §§ 15088(a), 15132. When a comment objects to the DEIR's analysis and raises significant environmental issues, the FEIR's response must give a reasoned, good-faith analysis and "describe the disposition of significant environmental issues raised," such as how revisions to the project will mitigate anticipated impacts. CEQA Guidelines § 15088(c). Comments must be "addressed in detail giving reasons why specific comments and suggestions were not accepted." *Id.* The required level of detail of a response "depends on factors such as the significance of the issues raised, the level of detail of the proposed project, the level of detail of the comment, and the extent to which the matter is already addressed in the DEIR or responses to other comments." *City of Long Beach v. Los Angeles Unified Sch. Dist.* (2009) 176 Cal.App.4th 889, 901. Generally, the level of detail in the response must match the level of detail in the comment. *Pfeiffer v. City of Sunnyvale* (2011) 200 Cal.App.4th 1552, 1568. "Conclusory statements unsupported by factual information" are never an adequate response. Guidelines § 15088(c); *City of Maywood v. Los Angeles Unified Sch. Dist.* (2012) 208 Cal.App.4th 362, 391.

As explained in our letter to the Planning Commission, the EIR fails to consider and respond to many comments offered in response to the DEIR in a meaningful way. The FEIR does not address all of the California Department of Fish and Wildlife ("CDFW") comments on the Project, which describe how the County should revise the ordinance to provide adequate protections to natural resources, such as ground water, and sensitive species and their habitat. In our September 15 letter, we explained how the County failed to respond to some of CDFW's comments regarding the effects of

proposed “crop swap” cultivation permits. We expand on some of the County’s other failures to respond to CDFW’s concerns here.

A. The Project’s Effects on California Tiger Salamander.

CDFW commented that the EIR does not include protective measures to mitigate all potentially significant impacts to the California tiger salamander (“CTS”) in areas outside the Santa Rosa Plain and does not consider impacts to upland habitat allowed under the proposed ministerial permits for crop swaps. FEIR at 3-57. This is because the EIR identified that CTS is predominantly located on the Santa Rosa Plain, but according to the California Natural Diversity Database (CNDDDB), the present and/or historical range also includes areas outside of Petaluma, Penngrrove, Cotati, and southwest Sonoma County. Consequently, CDFW recommended that the County implement the following:

1. Expand exclusion zones for ministerial permitting to include areas within 1.3 miles of all known CTS occurrences, including outside the formal Santa Rosa Plain boundary (e.g., rural areas of Southwest Petaluma, Penngrrove, and East Cotati). Data from sources like CNDDDB, USFWS critical habitat mapping, and local surveys should be used to inform this expanded buffer.
2. Require full CEQA review under the County’s Use Permit process for any cultivation project proposed in areas with suitable CTS habitat, regardless of zoning or CH status. Site-specific assessments should consider upland burrow habitat, not just aquatic features.
3. Require ITPs from CDFW for any project with potential to impact CTS through direct take such as through habitat alteration, or barrier creation. The County should not approve ministerial permits in such cases.
4. Restrict the use of rodenticides, herbicides, and synthetic pesticides in areas with suitable CTS habitat, and prohibit the use of rodenticide-laced grain in ground squirrel and gopher burrows.

The FEIR fails to take these recommendations seriously, and consequently fails to actually mitigate potentially significant impacts on CTS. First, the FEIR responds that because crop swaps would be limited to existing footprints, and would have already been developed in agriculture uses for at least five years, these circumstances would preclude CTS from occurring on sites eligible for ministerial permits. It thus implies that an exclusion zone for CTS habitat is not needed. However, though the ordinance does not

allow an expansion of the agricultural use, it does not prohibit all new grading, construction, and new infrastructure so that these activities would still be allowed in many instances. While the proposed ordinance now specifies that the footprint of the “cannabis premises” cannot be expanded (Proposed Ordinance, § 26-18-115(C)(4)(h)(4)), it does not expressly prohibit earth moving and construction activities within undisturbed open space areas in the footprint of the larger “premises” that are not used for cultivation or other structures, and which could potentially support CTS habitat. Instead, it states, without evidence, that as long as grading is limited to by-right activities, i.e. to “minor cuts of less than 50 cubic yards,” it will not “reasonably present the potential for environmental impacts.” Errata to the Final EIR, at 5. CDFW made no such distinction in its comments, stating simply that “[g]rading and filling of habitat” and “[o]ff-road vehicles” (i.e. for construction activities) could result in impacts to CTS. FEIR at 3-58. As a result, cannabis cultivation activities within CTS habitat, including but not limited to site grading, access improvements, and installation of fencing, could still result in “take” of CTS. *Id.* at 3-57. Nor does the County respond at all to CDFW’s comments stating as much. Without specific prohibition of such activities, any ground disturbing activities still allowed by right could result in significant impacts to CTS on sites subject to ministerial approval. The proposal therefore fails to adequately mitigate this impact with respect to, crop swap sites (which should be subject to discretionary review or exclusion buffers when within 1.3 miles of CTS breeding habitat).

Moreover, the FEIR response to CDFW’s comments refers to Mitigation Measure 3.4-2a, which requires avoidance measures of all known CTS occurrences. But Mitigation Measure 3.4-2a would not apply to crop swap sites if they are approved ministerially. Because grading allowed as-of-right, construction, and new infrastructure is not entirely prohibited at sites eligible for ministerial cultivation permits, the concerns discussed in the above paragraph still hold, meaning that the avoidance measure would not be enforceable to mitigate these activities. In addition, the measure only lists the Santa Rosa Plain Conservation Strategy Mapping and the CNDDB maps for determining occurrences. The measure should be revised to include data sources as recommended, including US Fish and Wildlife Service (“USFWS”) critical habitat maps and local surveys. Unless the CDFW’s recommendations are implemented, the cannabis program as drafted allows the potential for significant impacts to CTS and their habitat which the EIR has not accounted for or mitigated.

In response to CDFW’s recommendation to require incidental take permits (“ITPs”) for any project with the potential to impact CTS, the FEIR responds that, because cannabis activities are currently illegal under federal law, USFWS will not consult with applicants or issue take permits. FEIR at 3-59. In addition, the EIR assumes

that take of CTS must be completely avoided and did not include an offramp for an ITP from USFWS or CDFW. For these reasons, the FEIR concludes that the recommended inclusion of an option for incidental take permitting cannot be added to the Draft EIR. *Id.* This rationale cannot stand for two reasons. First, as discussed throughout this letter, and in our previous comments, the EIR's mitigation measures intended to ensure avoidance do not do so. Second, just because the USFWS will not comment on ITPs related to cannabis projects does not mean that the County cannot require an ITP. In dismissing this comment without actually explaining why federal law allegedly prohibits the County from implementing the comment (it does not), the County fails to respond to CDFW's comment.

In response to CDFW's recommendation that the County restrict the use of harmful rodenticides, herbicides, and synthetic pesticides in areas with suitable CTS habitat and prohibit the use of rodenticide grain in ground squirrel and gopher burrows, the FEIR relies on existing regulations. FEIR at 3-59 and 3-60. For instance, it refers to residue tolerance requirements set by EPA for each food crop with "reasonable certainty of no harm." But these residue requirements are determined based on safety for *human* consumption. *See* Attachment C, U.S. EPA, *Setting Tolerances for Pesticide Residues in Foods* (last visited Oct. 24, 2025), <https://www.epa.gov/pesticide-tolerances/setting-tolerances-pesticide-residues-foods>. The level of tolerance for amphibians such as CTS, exposed to these substances in residue in soil and in runoff water, is likely to be significantly lower. The USFWS Recovery Plan for the California Tiger Salamander indicates that

"[A]mphibians in general are extremely sensitive to contaminants due to their highly permeable skin which can rapidly absorb pollutant substances (Blaustein and Wake 1990). Sources of chemical pollution that may adversely affect Central California tiger salamanders include hydrocarbon and other contaminants from oil production and road runoff, the application of chemicals for agricultural production and urban/suburban landscape maintenance, increased nitrogen levels in aquatic habitats, and rodent and vector control programs." *See* Attachment D, USFWS Recovery Plan for the Central California Distinct Population Segment of the California Tiger Salamander (*Ambystoma californiense*), at I-12 and I-13.

Because CTS migrate to upland areas to estivate, and because they spend 95% of their lifetime in underground burrows, preservation of upland areas near breeding habitat is critical. FEIR at 3-57 to 3-58. The EIR's approach of dismissing CDFW's comments and only partially responding results in a lack of clarity on the above points

that would result in significant impacts to sensitive biological resources vulnerable to damage or destruction. These impacts are not analyzed or mitigated.

B. Adequate Performance Standards

CDFW commented that the EIR does not provide adequate performance standards, survey protocols, or agency oversight to ensure consistency and rigor in biological impact evaluations. The FEIR response refers to the EIR's Mitigation Measures 3.4-2a through 3.4-2o for a description of methods, timing and protocol surveys where warranted. FEIR at 3-61. However, the mitigation measures rely on a preliminary reconnaissance-level survey to determine whether habitat conditions are suitable for special-status species. *Id.* The methods and standards described in the mitigation measures do not apply to the preliminary biotic resources assessments (BRAs), but are instead for the subsequent evaluations if any are required. As CDFW pointed out, the County provides no standards for how these preliminary studies must be done. Such guidance is needed to ensure that consultants performing the work are consistent in their approaches and are all held to the same standard. Furthermore, CDFW commented that the process identified in the EIR does not incorporate consultation with or review by CDFW of the BRAs in determining whether there are potential species impacts on a proposed project site. FEIR at 3-60. CDFW is concerned with not being included in the review process to provide feedback and/or comments on the BRAs prior to determining if a project may impact sensitive or special-status species. *Id.*

CDFW then provided four recommendations aligned with the aforementioned concerns below. The recommendations are as follows:

1. Require that all BRAs follow current protocol-level survey guidelines for special-status species and habitats where available. Protocols and guidelines that generally represent what CDFW believes to be the best available methodology for the intended purpose can be found here: <https://wildlife.ca.gov/Conservation/Survey-Protocols>. Survey windows must align with species' detectability periods, and reports must include a surveyor's qualifications, methodology, and limitations.
2. Establish a County-level biologist and/or designate third-party reviewers to screen BRAs. If the BRA identifies the presence or likelihood of special-status species, there should be the opportunity for CDFW consultation.
3. Develop and publish a standardized BRA template to improve consistency across consultants and ensure all relevant environmental

attributes (e.g., CNDDDB/CNPS review, presence of wildlife movement features, habitat quality scoring) are included.

4. Require habitat value be assessed cumulatively, not just based on current vegetation cover. For example, a site located between two high-value habitats may function as a wildlife movement corridor regardless of its own vegetative condition.

The FEIR response appears to misunderstand CDFW's first recommendation and fails to address the issue of standards, protocols, or guidance for preparation of BRAs. The response completely ignores CDFW's second recommendation for third-party reviewers and for CDFW consultation prior to preparing BRAs. To assist in ensuring effective, efficient and timely review, applicants should initiate the permitting process with the County, and the County should refer projects to CDFW, similar to existing procedures for other project referrals. FEIR at 3-60.

The FEIR provides only a partial response to the third recommendation. Specifically, the third recommendation does not only address habitat connectivity corridors – it recommends a standardized BRA template to improve consistency across consultants and ensure all relevant environmental attributes are included. The response focuses on only two environmental attributes (wildlife habitat connectivity corridors and other wildlife movement) but fails to address implementing a standardized template for consultants to follow. Thus, the FEIR fails to fully respond to recommendation number three and fails to address the issue of consistency across environmental evaluations for cannabis projects.

Finally, the FEIR provides a dismissive response to CDFW's recommendation that the county require cumulative analysis of habitat values. As discussed in more detail in our prior comments on the DEIR and to the Planning Commission, an EIR may not conclude that a project will not contribute to cumulative impacts simply because it has a less than significant impact on a project level. *See Kings County Farm Bureau v. City of Hanford* (1990) 221 Cal.App.3d 692, 720-21 (“Cumulative impacts can result from individually minor but collectively significant projects.”). Yet, the EIR proposes exactly that. *See* FEIR at 3-61 (Response A4-8 states “As identified in the Draft EIR, implementation of mitigation measures identified in Section 3.4, “Biological Resources,” as well as compliance with County General Plan and Code standards and SWRCB Order WQ 2023-0102-DWQ would offset cumulative impacts from the proposed Cannabis Program Update.)

The purpose of analyzing cumulative impacts is to determine whether a collection of less than significant impacts may combine to be cumulatively considerable. This EIR acknowledges that potential cannabis production projects combined with other future projects will result in potentially significant impacts to biological resources, but concludes that, with the identified mitigation, all project level impacts to biological resources would be less than significant, and all cumulative impacts to biological resources would not be cumulatively considerable. FEIR at 3-45. By failing to require a cumulative impact analysis for habitat value, not just based on current vegetation cover, the EIR fails to require an evaluation of the impacts of future projects allowed together with other projects that are likely to result in significant impacts to important biological resources in the county. This approach does not comport with CEQA.

C. Impacts to Wetlands and Riparian Habitats

CDFW's comments on protection of wetlands and riparian habitat highlight "the unknown variability of site-specific cannabis activities" such that the Project's proposed setbacks from aquatic resources may not be enough to conclude that no adverse effects on any special-status fish would occur. FEIR at 3-62. For example, the EIR prohibits "vegetation clearing or disturbance" within buffer areas, but it fails to address other disturbances such as run-off or erosion from existing roads, vehicle activity, or drainage modifications. These disturbances and insufficient buffers may lead to increased sedimentation, waste water discharge, and other pollutants entering wetlands and or streams, which would in turn degrade habitat for sensitive aquatic species such as coho salmon (*Oncorhynchus kisutch*), California freshwater shrimp (*Syncaris pacifica*), and foothill yellow-legged frogs (*Rana boylei*). These species depend on intact riparian corridors for breeding, cover, and foraging. *Id.*

CDFW made several recommendations to address protection of aquatic resources, which are reproduced below.

1. All sites should be evaluated for potential wetland features within the required BRA. Sites with signs of wetland features should be delineated by a qualified professional to determine the appropriate setback distances from constructed areas. The EIR should clarify that buffer zones apply to all cannabis-related infrastructure, not just grow areas or structures.
2. Define acceptable buffer modification criteria in the EIR and ordinance. Deviations from minimum setbacks should require a site-specific ecological buffer effectiveness analysis conducted by a qualified professional such as

an ecologist with supporting data (e.g., slope, soil type, vegetation cover, and proximity to aquatic habitat).

3. Incorporate additional buffers for wetlands, springs, and seeps. These features are often unmapped but support rare species and contribute to watershed hydrology. A minimum 100-foot buffer should apply to these habitats unless otherwise approved in writing by CDFW and RWQCB.

4. Prohibit artificial lighting, pesticide storage/use, and loud mechanical operations within setback areas. Include time-of-day restrictions for activities near streams and riparian corridors during breeding or migration periods.

5. Encourage or require habitat enhancement within setbacks, especially on previously disturbed lands (e.g., riparian replanting, invasive species removal, erosion control). These measures can provide ecological value and resilience to edge effects.

6. Require improvements or relocation of any existing roads within setbacks that contribute sediment, erosion or other pollution to waters of the state.

Several of these comments were not adequately addressed.

First, recommendation number two, regarding defining acceptable buffer modification criteria in both the EIR and the ordinance, was not addressed. The FEIR responds that Mitigation Measure 3.4-5 requires a 100-foot buffer that cannot be reduced – it can only be increased. However, the response fails to address buffer modification criteria to avoid such things as increased runoff or erosion (e.g., from planned roads), vehicle activity or drainage modifications, and other similar changes.

Recommendations number four and number six discuss prohibiting certain activities with setback or buffer areas to protect habitat. The FEIR response refers to cannabis operations' required compliance with the Sonoma County Best Management Practices ("BMPs") for cannabis cultivation (which it does not include), existing County Code provisions (which are not specified), and the SWRCB. *See* Attachment B, Ex. A (Section 1, General Requirements and Prohibitions), SWRCB Order WQ 2023-0102-DWQ, Section 1, Terms 1, 10, 37 (cannabis cultivation).

To be sure, the County's BMPs for Cannabis Cultivation address *some* practices to protect wetlands and riparian areas. For example, they address pesticide and

fertilizer storage and use and limiting uses in riparian setbacks. *See* Attachment E, Sonoma County, *Best Management Practices Cannabis Cultivation* (last visited Oct. 24, 2025), <https://sonomacounty.gov/natural-resources/agriculture-weights-and-measures/divisions/agricultural-division/ordinances/best-management-practices-cannabis-cultivation>. However, they do not address loud mechanical operations or time-of-day restrictions during breeding or migration periods. The Sonoma County Code section on riparian corridors prohibits certain uses and allows waivers for others, but also fails to address noisy operations during critical times to protect bird and amphibian species during breeding and migration periods. *See* County Code § 26C-232 – Riparian Corridors. Similarly, the SWRCB Order also fails to address CDFW’s concerns. Term 1 (Attachment B, Ex. A, at p. 19) generically requires cannabis cultivators to comply with all applicable federal, state, and local laws, regulations, and permitting requirements. Term 10 (*id.* at 22) states that if sensitive plant, wildlife species, or communities are identified, the cannabis cultivator and Qualified Biologist shall consult with CDFW and CAL FIRE to designate a no-disturbance buffer to protect identified sensitive plant, wildlife species, and communities. While this requirement is helpful, it too does not address CDFW’s concerns. Term 37 (*id.* at pp. 31-32) addresses minimum setback distances for various water bodies, but fails to include any specific provisions related to uses allowed within those setbacks.

Moreover, the FEIR’s response to CDFW’s recommendation number six completely misses the mark. CDFW’s recommendation to require improvements or relocation of any existing roads within riparian setbacks that contribute sediment, erosion or other pollution to water bodies does not address “existing conditions” that are captured as part of the baseline, as the FEIR response claims. *See* FEIR at 3-62 to 3-63. As made clear in the “Issue” section of the comment preceding the recommendations, CDFW’s comment is concerned about “increased” vehicle activity within setback areas due to approval of cannabis projects. *Id.* The County is confusing an existing condition (existing roads w/ in setback areas) with new impacts caused by the project (increased use of existing roads w/in setback areas due to cannabis cultivation). Therefore, the FEIR fails to respond to CDFW’s comments regarding impacts to riparian and wetland setbacks and fails to make revisions to the ordinance based on CDFW’s concerns.

D. Tree Removal, Oak Woodland Conversion, and Vegetation Impacts

Finally, CDFW commented that the EIR fails to establish significance thresholds for tree removals and woodland conversion and fails to provide cumulative analysis of impacts to trees overtime. CDFW also commented that the EIR should include prohibition of mature or legacy tree removal and that offsite mitigation, preferably in the form of conservation easements, native habitat restoration, or purchase of appropriate

credits from an approved mitigation bank, should be required for all tree removal mitigation exceeding on-site replanting capacity.

Once again, the FEIR confuses project-specific impacts with cumulative impacts (and ironically accuses CDFW of misunderstanding the project). The FEIR responds that the Project would not allow for any tree removals and that any tree removals would require tree removal permits. However, the County can and should anticipate that cannabis cultivators will request tree removal permits to clear land for cannabis growing areas. The cumulative effect of collective tree removal countywide could indeed result in significant impacts that have not been addressed in the EIR. If they are to be addressed at the project-level review, the County should follow CDFW's recommendations to establish a significance threshold and cumulative impact tracking for tree removal (including legacy trees) and woodland conversion, and require off-site mitigation if on-site planting capacity is exceeded. Only with these tools in place will the County be able to avoid cumulative impacts to these resources.

II. The FEIR Fails to Correct Errors and Omissions in the Analyses of and Mitigation for the Project's Environmental Impacts.

As we discussed in our September 15 letter, the FEIR largely seeks to defend the erroneous assertions and conclusions of the DEIR. Because the Planning Commission failed to take action to correct these errors, we feel it necessary to reiterate some of the most significant ones, which both ours and CDFW's DEIR comments addressed. Particularly, the FEIR continues to insist that mitigation measures applicable to ministerial projects are enforceable when they are in fact not. Mitigation measures that are anticipated to be applied to all projects, as opposed to ones identified in project-level environmental review, must be made enforceable through incorporation into the proposed ordinance. CDFW's comments also recognized this, and recommended that crop swaps should not be subject to ministerial permits because of potential impacts to wildlife. While the FEIR claims that revisions to the proposed ordinance require crop swap sites to meet a list of criteria provided by CDFW, several of CDFW's recommended criteria are not addressed.

CDFW recommended that crop swap conversions should only be allowed if "[N]o stream or wetland is present on the parcel or within 150 feet of the proposed cultivation area or related infrastructure." FEIR at 3-49. The FEIR response states that setbacks from aquatic habitats for all cannabis cultivation activities are required in accordance with Sonoma County Code provisions as well as SWRCB requirements. FEIR at 3-50. However, the FEIR does not specify which section of the County Code applies. If Sec. 36.20.110 ("Setbacks for streams") applies, the required setback is merely

25 feet from the top of the higher bank or the existing setback, whichever is greater, unless a focused species assessment recommends a greater setback. The requirements under County Code Sec 11.14.110– (“Setbacks for wetlands”) are 50 to 100 feet, unless a wetlands report recommends a different setback. In either case, the setback would still be less than CDFW’s recommendation, which the County never actually explains why it rejected. *See Banning Ranch Conservancy v. City of Newport Beach* (2017) 2 Cal.5th 918, 940 (“[W]here comments from responsible experts . . . disclose new or conflicting data or opinions . . . these comments may not simply be ignored . . . [and] there must be good faith, reasoned analysis in response.”).

In addition, we commented to the Planning Commission that the criteria that the County proposed for evaluating water availability for groundwater-supplied crop swap permits fail to provide an objective benchmark for comparing seasonal differences of water consumption between cannabis and the crop being replaced. CDFW raised this important issue in its DEIR comments as well, suggesting that only a “monthly or finer timescale” for water availability could be a sufficiently specific ministerial approval criterion. FEIR at 3-49. In attempting to fix this problem, the County has only made it worse.

While the County alleges that it has integrated annual and seasonal comparisons of water availability into the proposed ordinance as both permit approval criteria and monitoring requirements, the new ordinance language does not make clear whether net zero water consumption is to be initially benchmarked (i.e. as a crop swap permit approval condition) against the previous year or dry season, or against some average of past years or dry seasons. Proposed Ordinance, § 26-18-115(C)(4)(h)(9)(b)(1) (stating only that “[n]et zero must be achieved both annually and during the dry season from May 1 – October 31”). Even if this vague language could be interpreted to benchmark water availability against the previous year or dry season, the EIR offers *no* explanation for this choice as opposed to an average baseline running over several years. *See* Errata to the Final EIR, at 21. Worse still, the new language does not define whether net zero “use” means quantity of water used or groundwater depletion relative to baseline levels (both of which the Proposed Ordinance require that cultivators measure). If net zero use means net consumption relative to baseline, it incentivizes future cultivators to overuse water in the year before an anticipated crop swap to set their baseline consumption artificially high. Likewise, if net zero “use” means net zero depletion, it risks incentivizing a flurry of crop swap conversions after a particularly dry year so that new cannabis cultivators initially benchmark their water usage against unusually low groundwater levels, allowing them to significantly deplete groundwater over the long term and still achieve net zero depletion relative to an improperly low baseline. As

discussed in our September letter, cannabis cultivators would have particularly strong incentives to “game” this proposed permitting criterion in this manner, because cannabis crops require more water than most conventional crops grown in Sonoma County. *See, e.g.,* Attachment F, Zhonghua Zheng, Kelsey Fiddes & Liangcheng Yang, *A Narrative review on Environmental Impacts of Cannabis Cultivation*, 3 J. Cannabis Rsch. 1 (2021); Attachment G, 2023 Sonoma County Crop Report (crops grown in Sonoma County include wine grapes, apples, and vegetables and fruits like mushrooms, squash, tomatoes, beans, olives, peaches, and stone fruits). In proposing this vague benchmarking and monitoring regime that is ripe for potential abuse, the County has made the EIR deficient in a new way by offering no explanation for how and to what extent these choices will actually mitigate the potentially significant impact of the Project on groundwater availability that it previously identified. It cannot simply assume that this will not be a future issue.

Response to Comment A4-4 states that setbacks from crop swaps to aquatic habitats are required in accordance with SWRCB Order WQ 2023-0102-DWQ under Terms 1, 10, and 37. FEIR at 3-50; Attachment B, Ex. A. These provisions require a 150-foot setback from perennial watercourses, waterbodies (e.g. lakes, ponds), and springs. Attachment B, Ex. A, at p. 31 (Term 1 at p. 19 requires compliance with all applicable federal, state, and local laws, regulations, and permitting requirements and Term 10 at p. 22 requires a study prepared by a qualified biologist and consultation with CDFW and CalFire to designate the buffer or setback). By referring to both the County Code and the SWRCB Order, the FEIR muddies the waters so that the setback required is unclear. In the absence of a clear setback, which according to CDFW should be 150 feet, determining the size of any different setback would require discretion so that crop swaps may not be allowed with a ministerial permit. Therefore, crop swaps should be subject to a discretionary use permit.

In addition, CDFW recommends that crop swaps should not be allowed with a ministerial permit if new grading or construction of buildings, facilities, or infrastructure is proposed, even if no grading permit is required. FEIR Comment A4-4 at 3-49. The FEIR response indicates that the proposed ordinance prohibits crop swaps from constructing any new permanent structures, but would allow temporary hoop houses which CDFW recommends banning. *Id.* The response ignores CDFW’s recommendation to prohibit new grading, construction, and new infrastructure so that these activities would still be allowed. As we discuss in Section I.A of this letter, by dismissing CDFW’s comments regarding grading and other construction activities, the Project would result in significant impacts to sensitive biological resources vulnerable to damage or destruction. These impacts are not analyzed or mitigated. The County should comply with CDFW’s

recommendation that crop swaps that do not meet *all* of the criteria as stated in CDFW's letter, including banning imported potting soil and rows of plastic pots, should be ineligible for ministerial permits and instead require discretionary review. FEIR at 3-49.

Additionally, the FEIR acknowledges that orchards may provide nesting habitat for special-status birds. FEIR at Response A4-4 at 4-49 and 3-50. Yet, the FEIR stops short of making the logical connection that if orchards provide habitat for special-status birds, swapping the orchard crop for a cannabis crop will necessarily impact special-status birds. Such a crop swap would result in significant impacts that are not analyzed or mitigated. As a result, the FEIR fails to adequately respond to this comment from CDFW.

Finally, the cumulative impacts analysis fails to take ministerial approvals of crop-swap projects into account. As CDFW explains in detail in its comments on the DEIR, crop swap projects have the potential to result in substantial impacts through damage or destruction of sensitive habitat (e.g., burrows or other refugia), through indirect impacts (such as lighting and noise), through habitat fragmentation caused by impacts from construction of infrastructure and other ground-disturbing activities allowed by the Project, through pollution such as plastic fragments from monofilament plastic netting and mesh and water pollution (e.g., sediment and pesticides), and through the introduction of invasive species. FEIR at 3-48, 3-51, 3-65 to 3-66, 3-67, 3-68, 3-69.

III. Conclusion

As discussed throughout this letter, the EIR's analysis understates the severity of the potential harm to County residents, groundwater resources and water quality, and biological resources, among others as described in SOSN's prior comments. Having failed to rigorously evaluate the impacts and provide substantial evidence supporting this evaluation, the EIR also neglects to identify sufficient mitigation (supported by substantial evidence) to minimize these impacts. The Project's impacts were not adequately analyzed and mitigated, nor are they remedied in the FEIR. The EIR cannot support the findings required by CEQA. Based on these uncorrected flaws, SOSN opposes the Project as proposed. As the EIR makes clear, however, there are alternatives available that would reduce the Project's significant impacts, specifically Alternative 2, which SOSN would support. For these reasons, SOSN respectfully requests that the Project be denied until such time as a complete analysis consistent with CEQA is prepared, or that the Board instead approve Alternative 2.

Members of the Board of Supervisors
October 24, 2025
Page 16

Very truly yours,

SHUTE, MIHALY & WEINBERGER LLP

A handwritten signature in blue ink, appearing to read "JPetta", with a long horizontal flourish extending to the right.

Joseph Petta
Caleb Hersh

cc: hermosillo@sonomacounty.gov
david.rabbitt@sonomacounty.gov
district3@sonomacounty.gov
district4@sonomacounty.gov
district5@sonomacounty.gov
scott.orr@sonomacounty.gov
sita.kuteira@sonomacounty.gov

1979966.3

From: [Veva Edelson](#)
To: [BOS](#)
Subject: Support 1,000-Foot Setbacks and Responsible Cannabis Ordinance
Date: Friday, October 24, 2025 11:33:21 AM

EXTERNAL

Subject: Support 1,000-Foot Setbacks and Responsible Cannabis Ordinance

Dear Supervisors,

I am writing regarding the EIR and the Cannabis Ordinance update. I urge the Board of Supervisors to **support staff and Planning Commission recommendations for a 1,000-foot setback between commercial cannabis operations and residential parcels.**

In addition, I strongly encourage the Board to extend this **1,000-foot setback between all parcels and commercial cannabis** to ensure true neighborhood compatibility. There is ample evidence to support this standard, regardless of zoning designations, as it directly impacts the health, safety, and quality of life of nearby residents.

I also ask that **projects currently in the pipeline that have not yet been permitted** be subject to the same 1,000-foot setback requirement. The existing setbacks—300 feet from a residence or 100 feet from a property line—are insufficient and do not meet the intent of a protective, community-oriented ordinance.

Furthermore, I urge the Board to **retain term limits and sunset provisions** so that existing operations end at the conclusion of their current permits. It would not be advisable to issue permits that run with the land. The State requires five-year renewals, and Sonoma County should maintain at least that same level of oversight and accountability.

Adopting these measures will help rebuild trust between residents and local government and fulfill the long-standing promise of an ordinance that truly addresses neighborhood compatibility. The 1,000-foot setback is a major step forward—let's make sure we follow through all the way.

Thank you for your time and consideration.

Sincerely,

Veva Edelson

Bloomfield, CA

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From: billkrawetz@comcast.net
To: [Lynda Hopkins](#); [Rebecca Hermosillo](#); [Chris Coursey](#); [David Rabbitt](#); [James Gore](#); [BOS](#)
Cc: [Cannabis](#); [Crystal Acker](#); [Scott Orr](#)
Subject: Cannabis Ordinance Update Recommendations - BOS meeting Oct 28th 2025
Date: Saturday, October 25, 2025 1:04:10 PM

Dear Supervisors

The Neighbors of West County (NOW) provide the following brief comments and recommendations on updates to the Cannabis Ordinance.

We feel the current staff proposal still doesn't address many of the concerns raised by the public, and public agencies (CDFW, and water boards) and don't feel it achieves the BOS stated goals in the Framework document. (Item 7 of the March 15, 2022 Framework document requires neighborhood separation criteria.) A few modifications to what are being proposed can help to achieve these goals.

Getting a few provisions right will solve 99% of the concerns and conflicts, allowing the cannabis industry, county administration and the public to go forward peacefully and harmoniously, putting this issue to bed permanently.

Recommendations:

Significant comments have been submitted by many. This is a very brief summary:

1. **Setbacks:** The 1,000ft setback from the property line should be applied for all people, all homes, regardless of where they live, whether it's on Ag or residential zoning parcels. The 1K ft setbacks being proposed for schools and parks, should also be applied to homes, where families spend the majority of their time. 100ft setback proposed for the 15K family homes that just happen to be on Ag/RRD parcels, isn't fair, doesn't protect them. Children, as well as Ag workers, largely Hispanic, live on these Ag and RRD areas too, so to not provided the same 1K separator is a socio- economic and racial

injustice.

- a. **The 300ft setback from neighboring residential structures:** This current setback rule should be maintained, not eliminated as Staff proposes, and should be increased.
2. **10-acre minimum** – Established by BOS 2018 action and re-affirmed by the Planning Commission on Sept 17th. This continues to provide good protection and achieves Neighborhood Compatibility for many areas. Your 2018 action has eliminated much of the contentiousness experienced in the past. The Board should build on your foundation by increasing to 15-20 acres.
3. **Cannabis Events:** Let's be clear, **Consumption** is the only reason people will be going. This puts more impaired drivers on the roads. This puts families and bike riders at risk. A recent study showed 42% of the traffic fatalities involved drivers with elevated THC levels. Your vote will result in whether Sonoma County sees more of the same.

We are close to finding a solution that works for both the community and the industry. These few changes can finally achieve a workable solution for all.

Thanks for your consideration.
Neighbors of West County (NOW)
Bill Krawetz

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From: [Dan Quinones](#)
To: [BOS](#)
Subject: Commercial Cannabis in Dry Creek valley
Date: Saturday, October 25, 2025 11:03:17 AM



I would vote no.

--

Owner & Founder

www.quinonesbrands.com

[@danquinones_brands](#)

// PINE Photo and Video

// Dan Quiñones Prints

// The Pioneer's Approach Podcast

// For The Restless Clothing Company

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From: [Doug M](#)
To: [BOS](#)
Subject: Opposition to Draft Cannabis Ordinance
Date: Saturday, October 25, 2025 9:11:10 AM

I am writing to express my strong opposition to the Draft Cannabin Ordinance that is before the Board of Supervisors for approval.

I urge the Board to vote to **Not Certify** the EIR.

Thank you,

Douglas Muhleman

3685 West Dry Creek Rd.,
Healdsburg, CA

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From: [Judy Johnson](#)
To: [BOS](#)
Subject: attn: Supervisor Hermosillo
Date: Saturday, October 25, 2025 12:10:58 PM



Dear Supervisor Hermosillo,

I strongly urge you to not allow grandfathering in the upcoming cannabis ordinance update. Specifically, I ask that any discretionary cannabis use permit application deemed complete, but which has not received final approval and has no VESTED RIGHT, NOT be allowed to proceed under the setbacks of the existing ordinance.

Allowing unapproved applications to operate under outdated rules would significantly undermine the purpose and effectiveness of the new ordinance, particularly if it includes enhanced protections for nearby residences. These updated standards are critical to ensuring that cannabis operations are appropriately sited and that **the rights and wellbeing of surrounding residents are safeguarded.**

Please ensure that all pending or new applications are held to the updated, more protective standards. This will help promote fairness, transparency, and community trust in the County's cannabis permitting process.

Thank you for your attention to this matter and your continued service to our community.

Sincerely,

Judy Johnson
10622 Barnett Valley Rd.
Sebastopol, CA 95472

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From: [Sam Siggins](#)
To: [BOS](#)
Subject: Attn: Supervisor Hermosillo
Date: Saturday, October 25, 2025 2:09:17 PM



Dear Supervisor Hermosillo,

I strongly urge you to not allow grandfathering in the upcoming cannabis ordinance update. Specifically, I ask that any discretionary cannabis use permit application deemed complete, but which has not received final approval and has no VESTED RIGHT, NOT be allowed to proceed under the setbacks of the existing ordinance.

Allowing unapproved applications to operate under outdated rules would significantly undermine the purpose and effectiveness of the new ordinance, particularly if it includes enhanced protections for nearby residences. These updated standards are critical to ensuring that cannabis operations are appropriately sited and that the rights and well being of surrounding residents are safeguarded.

Please ensure that all pending or new applications are held to the updated, more protective standards. This will help promote fairness, transparency, and community trust in the County's cannabis permitting process.

Thank you for your attention to this matter and your continued service to our community.

Sincerely,

Sam Siggins
10622 Barnett Valley Rd.
Sebastopol, CA 95472

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From: [Becky Bass](#)
To: [Rebecca Hermosillo](#)
Cc: [Becky Bass](#); [Lynda Hopkins](#); [David Rabbitt](#); [Chris Coursey](#); [James Gore](#); [Crystal Acker](#); [Cannabis](#)
Subject: We're counting on you!
Date: Sunday, October 26, 2025 2:35:52 PM

EXTERNAL

Dear Supervisor Hermosillo,

I know that there are a lot of issues on your plate at the moment, such as budgetary concerns and potential ICE actions to name a couple.

However, I want to remind you that we are counting on you to represent your constituents in Bennett Valley who are extremely concerned that most of the proposed modifications to the cannabis ordinance do much more to facilitate the commercial cannabis industry than they do to promote compatibility with rural neighborhoods.

Please:

1. Re-open the consideration of having some "exclusion zones" in the County. Isn't that in effect for the coastal areas? Why can't certain parts - especially those already considered "Scenic Landscape Units" - be off-limits for commercial cannabis operations, especially where lots of support for this concept has been voiced by residents?
2. Vote against allowing "crop swaps". Such a provision would really undermine the intention of protecting nearby rural residents and the environment, given the differences in water usage and the visual, odor, and soil impacts of cannabis vs the crop it would be replacing.
3. Most especially, please vote against allowing visitor-serving uses and special events in our rural areas where we have little law enforcement presence and dangerous roads. If adopted, these provisions would expose rural residents to unnecessary risks. It would be much better to keep the events and consumption at more public places like the Fairgrounds, or in-town dispensaries.

Some commercial cannabis cultivation is a fact of the future. However, in seeking to "balance" the developing industry with the well-being of your constituents, please keep in mind that what has made local commercial cannabis less profitable is not the rules and regulations imposed by the County, but the fact that it is always competing with an entrenched black market, and that there is a nation-wide glut of production lowering the price of the product. No matter how you modify the County ordinance, those realities are not going to change.

However, loosening the conditions on this industry in Sonoma County runs the risk of spoiling this beautiful place forever, as has been seen in other places (e.g. outside Santa Barbara; Apple Valley, Oregon). Don't let that happen to us! Have the courage and the vision to restrict the locations where commercial cannabis may be cultivated in order to protect and preserve the beauty of our County for current and future generations.

Again, we are counting on you to advocate for us in this issue on Tuesday afternoon's agenda.

Thank you,

Rebecca Bass
2810 Bardy Road
Santa Rosa

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From: [Bill Williamson](#)
To: [BOS](#)
Subject: Formal Opposition to Cannabis Program Approval in Dry Creek Valley
Date: Sunday, October 26, 2025 5:16:00 PM
Attachments: [Board of Supervisors \(1\).docx](#)

EXTERNAL

On behalf of the three generations of our family currently living in Dry Creek Valley we respectfully submit this correspondence to **formally oppose the approval or expansion of any Cannabis Program within the Dry Creek Valley American Viticultural Area (AVA)**. This region is a recognized agricultural preserve of statewide significance, historically and economically dedicated to premium winegrape production and agritourism.



707-433-1500

williamsonwines.com

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Board of Supervisors

County of Sonoma
575 Administration Drive, Room 100A
Santa Rosa, CA 95403

October 26, 2025

Subject: Formal Opposition to Cannabis Program Approval in Dry Creek Valley

Dear Members of the Sonoma County Board of Supervisors,

On behalf of the three generations of our family currently living in Dry Creek Valley we respectfully submit this correspondence to **formally oppose the approval or expansion of any Cannabis Program within the Dry Creek Valley American Viticultural Area (AVA)**. This region is a recognized agricultural preserve of statewide significance, historically and economically dedicated to premium winegrape production and agritourism.

The proposed introduction of cannabis cultivation and associated operations within Dry Creek Valley is **incompatible with existing land use designations, the General Plan's agricultural preservation goals, and the established character of the area**. Specifically, the following points warrant consideration:

1. **Land Use Incompatibility:** Cannabis operations represent an intensive, industrial-style agricultural use inconsistent with the Valley's low-intensity, open-space agricultural zoning and scenic corridor protections. The required infrastructure—fencing, lighting, and security measures—fundamentally alter the rural visual environment.
2. **Environmental Impacts:** Cannabis cultivation poses substantial risks to local water resources and may conflict with the County's Climate Resilience and Water Conservation objectives. Additionally, odor emissions, noise, and potential chemical use could adversely affect nearby vineyards and residents.
3. **Traffic and Safety Concerns:** The narrow, rural roadways of Dry Creek Valley were not designed to accommodate the increased commercial traffic associated with cannabis operations. This raises both public safety and infrastructure maintenance concerns.
4. **Economic and Community Integrity:** The Dry Creek Valley economy is deeply tied to its identity as a premier winegrowing and agritourism destination. The introduction of cannabis-related activities threatens to erode the established brand value and diminish property values throughout the region.

Given these material conflicts with existing policy, environmental stewardship principles, and community welfare, I respectfully urge the County to **exclude Dry Creek Valley from any current or future Cannabis Program approvals** and to reaffirm its commitment to the agricultural, scenic, and cultural integrity of this viticultural heritage area.

Thank you for your consideration,



Bill Williamson

Williamson Family – Dry Creek Valley Residents and Owners, Williamson Wines Inc.

From: [Bonnie Bridges](#)
To: [BOS](#)
Subject: RR Setbacks from incompatible commercial cannabis
Date: Monday, October 27, 2025 7:50:20 AM

Hi:

I live at 293 McGregor Lane and am concerned about the long term negative health impacts of cannabis farming. As such, I am writing to support the 1,000 minimum setback and the following:

1. An **application is not a vested right**.
2. The **new setbacks must apply to all applications**, including those deemed “complete.”
3. **Permits should not run with the land**—term limits and accountability are essential.

Thank you for your work on this matter.

Bonnie Bridges

--

Bonnie Bridges
Sebastopol, CA
bonnie.bridges8@gmail.com
415-819-2181

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From: [Eric Fuge](#)
To: [BOS](#); [Lynda Hopkins](#); [Chris Coursey](#); [James Gore](#); [David Rabbitt](#); [Rebecca Hermosillo](#)
Subject: Cannabis Ordinance Vote
Date: Saturday, October 25, 2025 8:03:21 AM

Dear County Supervisors,

I am writing in regards to the new cannabis ordinance proposed for your approval. Below is a list of unresolved issues I ask to be addressed before such approval. Please don't let your constituents down by not solving these issues before your vote. The ordinance is not ready for approval until the many issues are resolved. Here are some:

1. No estimate of costs for taxpayers for this expansion. No plan on how to pay for expansion.
2. Needs clarification of the swap program proposed such as water use and required time of crop to be swapped.
3. Ramifications and legal reasons of permanent grandfathering in of previous permits with a cut off time for renewal.
4. Ramifications and legal reasons of permanent grandfathering in of permit applications in the pipeline under old rules when those guidelines have been concluded to be incorrect.
5. Not enough research on smell and toxins.
6. Creating the category of "controlled agriculture" which is NOT recognized by any other governmental entities and has no precedent or other official meaning.
7. Increasing 20 acres today to a possible 208 acres without a review of such an increase to roads, water, health, safety, wildlife, etc.
8. Not following the California's Department of Fish & Wildlife mandate that certain cannabis operations shouldn't be allowed to use plastic hoop houses without proper environmental review.
9. Not following the California Department of Fish and Wildlife mandate that certain cannabis operations can't use imported "soils" to grow cannabis in pots.
10. Not following the California Department of Fish and Wildlife mandate that certain areas of Sonoma County not be allowed to have cannabis operations.
11. No protection for residents from such an increase of cannabis. No increase in police, no enforcement policy, no policy to remove a problematic grower, no solution to remove a permanent permit, no increase in County staff to manage problems.
12. Removal of residents' health and safety in the ordinance.

What does this say?

13. No ideas of how to manage the increase of stoned drivers on small county roads with no street lights, sidewalks, or pull offs from tasting events in such locations.

14. Less support of residents who have paid for the EIR, your salaries, and the cannabis industry's reduction in taxes.

15. No guidelines of how to manage the million dollar value inside the truck transport of product and money from rural growing sites into cities, again on small county roads.

Thank you for your consideration,
Eric Fuge
Bloomfield, CA
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From: [Mara](#)
To: [BOS](#)
Cc: [Jennifer McGrath](#)
Subject: See attached letter
Date: Monday, October 27, 2025 9:12:04 AM
Attachments: [20251026021632.pdf](#)



From Allan Kipperman and Ayris Hatton

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Via Electronic Mail (bos@sonomacounty.gov)

October 24, 2025

Board of Supervisors
County of Sonoma
575 Administration Drive
Room 100 A
Santa Rosa, CA 95403

Re: Comprehensive Cannabis Program Update and Final Environmental Impact Report Project File No. ORD21-0004

Dear Board of Supervisors:

As Sonoma County residents, we became aware of the cannabis land use process via an appeal of the Board of Zoning Adjustments filed in Fall 2024 regarding a proposed cannabis project at 4707 Bloomfield Road, Petaluma, California. The project, proposed by Bloomfield Farms LLC/Michael Agins, includes 10,000 square feet of mixed light cannabis cultivation in a 12,960 square foot greenhouse, 5,000 square feet of indoor cannabis cultivation in a 6,480 square foot warehouse, and centralized processing of cannabis in a 10,000 square foot warehouse. Those limitations are consistent with the current County Code.

The proposed Cannabis Program Update will greatly expand the scope of permitted cannabis cultivation with minimal protection for adjacent residents. In our original appeal, we identified significant impacts of the hours of operation, traffic, odor, noise, and lighting. The majority of the appeal was based on inconsistency between the Mitigated Negative Declaration and the Conditions of Approval. The hearing on the appeal was scheduled for January 28, 2025, but was continued indefinitely at the meeting. We are writing for similar reasons on the proposed Cannabis Program update and Draft Environmental Impact Report ("EIR").

First and foremost, cannabis is not the same as other agricultural crops. No other crop generates the level of harmful impacts as cannabis. From noxious smells and air quality to interference with the comfort and enjoyment of residents' homes, cannabis should not be protected by the Sonoma County Right to Farm Ordinance under Policy AR-4d. Cannabis is not a traditional agricultural crop that needed protection in 1999 when the Right to Farm ordinance was adopted to preserve the agricultural nature of the County. Under Article 30, Sec. 30-25, an agricultural operation cannot be or become a nuisance "provided that such operation complies with the requirements of all applicable federal, state, and county statutes, ordinances, rules, regulations, approvals and permits."

Due to this protection, the regulation of cannabis and the specific conditions of approval at a local level become more important as the neighboring residents are severely limited in protecting themselves or their properties. Also, a March 2025 decision in Santa Barbara determined that the California Right to Farm Act (Civ. Code, § 3482.5, subd. (a)(1)) does not apply to cannabis. In fact, it is likely that the County's inclusion of cannabis is preempted by the California Right to Farm Act (Civ. Code, § 3482.5, subd. (a)(1)(d)) which provides as follows: "This section shall prevail over any

contrary provision of any ordinance or regulation of any city, county, city and county, or other political subdivision of the state . . .”. Moreover, cannabis cultivation does not and cannot comply with Federal law; therefore, the Sonoma County Right to Farm ordinance does not apply. For similar reasons, “crop swap” provisions should not be specifically created for cannabis-nor should the current 300-foot setback from off-site residences and business or the term limits and permit renewals be eliminated. Cannabis is simply not the same as other agricultural crops and should be more strictly regulated with greater setbacks and shorter-term limits.

Second, there are specific recommendations that should be incorporated into the Cannabis Program Update and analyzed in the EIR.

1. **Odor control** is one of the most critical elements of any cannabis business. This is a particularly acute issue for growing, harvesting and processing cannabis. Odor is one of the most common and frequent complaints by the local community. Cannabis odor has substantial negative impacts on the community ranging from public health to reduced property values. Cannabis odor often results in significant time and money spent by neighbors, operators, and county staff on complaints, litigation and appeals.

Mitigation Measure 3.3-4a of the EIR addresses odor but it does not go far enough. The mitigation measure should be expanded to include an **Odor Abatement Plan**, to be approved by the County, which prevents odors from being experienced within residential areas. Most critically, the Odor Abatement Plan should specifically require the use of **carbon scrubbers**. The Plan should also address maintenance of equipment, continuous monitoring by the applicant using Nasal Ranger odor detection equipment, and maintenance of odor monitoring data for 3 years. The Plan should include community participation and outreach to residents located within 1,000 feet of the project property and provide contact information for the applicant’s Primary Odor Contact, who shall be available by telephone on a 24 hour/day basis. The Plan should provide that Permit Sonoma staff shall monitor implementation prior to final building clearance and that staff may request additional measures necessary for corrective actions to be provided at the cost of the applicant.

2. **Noise** is not adequately addressed by the Cannabis Program Update or the Draft EIR as both simply reference the Sonoma County Noise Guidelines. Superior noise protection is necessary to protect the community. For example, the local area where our residence is located is a quiet, rural community with some farming and large animal grazing. Our residence is on top of the hill overlooking the Bloomfield cannabis project site which puts us in the unique position of noise and odor impacting our property more than others. Noise can be generated from traffic, employees, and equipment such as HVAC, fans, circulation, ventilation, exhaust, blowers and heaters, etc.

Rather than a project-by-the project analysis, the Cannabis Program Update and Draft EIR should require and analyze a **Noise Abatement Plan** requirement that prevents excessive noise from being experienced within residential areas. The Plan should include, among other things, installation of necessary equipment and soundproofing to limit any noise to 0

decibels of continuous noise 24 hours/day, proper maintenance of equipment, continuous monitoring by the applicant using noise detection equipment and maintenance of that noise monitoring data for 3 years, community participation and outreach to residents located within 1,000 feet of the project property line, contact information for the applicant's Primary Noise Contact who shall be available by telephone on a 24 hour/day basis, and the ability for Permit Sonoma staff to monitor implementation prior to final building clearance and request additional measures necessary for corrective actions to be provided at the cost of the applicant.

3. **Lighting and Glare** are additional concerns in our rural community. Mitigation Measure 3.1-4b outlines a mitigation strategy; however, it recommends implementation through the zoning permit, use permit, or design review. We request these mitigation measures be incorporated into 26-18-115 (C)(1)(b) to provide better assurance of its universal implementation.

In closing, because I am a physician, I have serious concerns about the health hazards posed by the molecular debris in the air associated with cannabis operations. I do not believe adequate safety measures are included in the proposed regulations, nor do residents have adequate recourse to address any related health issues.

Thank you for your consideration.

Sincerely,

A handwritten signature in blue ink that reads "Allan Kipperman M.D." with a stylized flourish at the end.

Allan Kipperman, M.D. and Ayris Hatton

A handwritten signature in blue ink that reads "Ayris Hatton" with a stylized flourish at the end.