

Attachment O
Public Comment Received after
Planning Commission Public Hearing
through May 5, 2021

To view Public Comment Received through
Planning Commission Public Hearing
(February 16, 2021 - March 18, 2021)

Click on the Links Below

[Attachment F – Written Public Comment](#)

[Attachment F Addendum 1](#)

[Attachment F Addendum 2](#)

[Attachment F Addendum 3](#)

[Attachment F Addendum 4](#)

[Attachment G – Cannabis Workshops Public Comment](#)

[Attachment G Addendum](#)

From: [DeLaine Emmert](#)
To: [Cannabis](#)
Subject: No cannabis greenhouses!!!
Date: Thursday, March 18, 2021 10:39:11 PM

EXTERNAL

Please , vote No on the cannabis farm!!!

Sent from my iPhone

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From: [Chelsea Holup](#) on behalf of [PlanningAgency](#)
To: [Cannabis](#)
Subject: FW: clarification on hoop house
Date: Friday, March 19, 2021 3:29:47 PM

From: Deborah Eppstein <deppstein@gmail.com>
Sent: March 18, 2021 6:43 PM
To: PlanningAgency <PlanningAgency@sonoma-county.org>
Subject: clarification on hoop house

EXTERNAL

Dear Planning Commissioners,

I want to correct a statement that was made concerning the discussion of hoop houses during the discussion today. The definition of hoop house in Chapter 38 is:

“Hoop House” means a temporary structure used for season extension or crop protection that is erected for less than 180 days in a twelve month period, less than 12 feet in height, constructed of light frame materials, and covered with shade cloth or clear, flexible plastic that is readily removable. A hoop house may or may not have associated temporary electrical, plumbing, or mechanical equipment.

Thus the hoop house can have electrical, plumbing, mechanical, which allows it to function as mixed light.

That is what has occurred in Humboldt county. It would be helpful if you could clarify what permits are required for this. Andrew Smith indicated that only a fire permit was needed and no building permits, but that was not clear.

This is important.

Thank you,
Deborah Eppstein

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From: [district5](#)
To: [Cannabis](#)
Subject: FW: Issue: Cannibus cultivation
Date: Friday, March 19, 2021 1:54:56 PM

-----Original Message-----

From: no-reply@sonoma-county.org <no-reply@sonoma-county.org>
Sent: Thursday, March 18, 2021 5:59 PM
To: district5 <district5@sonoma-county.org>
Subject: Issue: Cannibus cultivation

Sent To: County of Sonoma

Topic: Issue

Subject: Cannibus cultivation

Message: Please vote against cannibus. We don't have enough water available. I don't want to be like Paso Robles when they pumped their aquifer dry and had to truck water to their rural residents. Also they are having vicious court battles over future land development and water use. Please learn from their mistakes.

Sender's Name: Greg Harder

Sender's Email: gregharder@sbcglobal.net

Sender's Cell Phone: 7074907790

Sender's Work Phone: 7072931010

Sender's Address:

1175 Merced Ave.

Santa Rosa, CA 95407

From: [Pamela Davis](#)
To: [Cannabis](#)
Subject: Fw: Feedback from your question
Date: Thursday, March 18, 2021 7:24:49 PM

From: Lisa Lai <allcalilisa@gmail.com>
Sent: Thursday, March 18, 2021 6:24 PM
To: Pamela Davis
Subject: Feedback from your question

EXTERNAL

Hi Pamela,

I have to disagree with Andrew Smith and his vision of a co-op style setup on large parcels. I have had four experiences with this so far.

On two occasions, the land owner asked me to pay rent and give them 50% of my profits, while paying for the complete setup.

On one occasion, I was offered no cash upfront but to give the landowner 75% of my profits.

On one occasion, I was offered no cash upfront and to give the landowner and other partners 90% of my profits.

Landowners with large parcels are sharks who are trying to ride on the backs of farmers. Purchasing a large parcels that fits the standards costs one million dollars and needs another 500 thousand dollars in upgrades of wells, roads, ect.

Small farmers who live and work their land in RR, AR and small parcels will never compare to leasing land or trying to get large private money loans for a larger parcel.

I also definitely want my permit before you open it up to the 10% cap. We were told we would have years to get established before the big boys were allowed in, but we still don't have permits and are not being offered a way to transfer without pulling permits and reapplying. This would not keep us from owing PRMD a ton of cash. We were supposed to get priority processing and have been seriously let down.

Lisa Lai
All Cali Farmh

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From: [Leanne Nakashima](#)
To: [Cannabis](#)
Subject: Draft cannabis ordinance
Date: Thursday, March 18, 2021 9:42:45 PM

EXTERNAL

I am a voting, 30-year Sonoma County resident and I am a proud member of our Sonoma County Cannabis industry. I voted for the legalization of cannabis in California, and I was privileged to help operate and own the longest permitted cannabis dispensary in Sonoma County, Sonoma Patient Group. I took part in helping develop the Teamsters and SRJC Hemp and Cannabis Apprenticeship program in 2019 as I believed that with the Hemp and Cannabis Industry growing larger today than our Airlines industry, cannabis laborers deserve education and training like any other industry. It's my belief that by establishing an ordinance that supports our cannabis industry's growth, Sonoma County will prosper and grow into a leading cannabis region in California.

I personally have been waiting for years for the release of this draft ordinance. I am very proud to see Cannabis cultivation permitting move to the agriculture department as I feel Andrew Smith and his staff understand that Cannabis is an agricultural commodity and should be treated like any other agriculture.

There are several concerns about the draft ordinance that I wanted to address.

Please draft language in the ordinance that will provide a clear pipeline and pathway for the Sonoma County Legacy Cultivators. These cultivators are the people who built our Sonoma County medical cannabis industry and are the farmers still fighting today become fully licensed. These farmers are the heart of our industry and deserve a chance. With the push at a state level to create appellations and develop regional cannabis, our legacy farmers deserve to be a part of this incredible process. These are the farms that have been producing our regional cannabis products for years. Our Sonoma County Agriculture Department has already created a Hemp ordinance that treats it like any other agriculture in our county, so why can't cannabis be treated the same way in our county?

Below are specific changes to the draft ordinance that I would like to discuss.

Generally, references for indoor and greenhouse cultivation should be omitted or specifically referred to Chapter 26. Several sections include discussion of indoor and greenhouse cultivation, which is not applicable to the proposed chapter. This is noted in Sections 38.12.030, 38.12.040, 38.12.060 and other sections.

Section 38.12.040 – Setbacks.

Comment: Chapter 26 Section 26-88-254(f)(6) includes language:

“This park setback may be reduced with a use permit when it is determined that an actual physical equivalent separation exists due to topography, vegetation or slope, that no offsite impacts will occur, and that the cannabis operation is not accessible or visible from the park.”

While proposed Chapter 38, Section 38.12.040 does not include this language. It seems proposed Chapter 26 should at least point to Chapter 38, so the applicant can choose the ministerial permit pathway.

Comment: Section 38.12.040.A.3. appears to conflict with Section 38.12.010.D.3. While Section 38.12.040.A.3. states “outdoor or hoop

house cultivation, the cultivation area must be set back a minimum of 1,000 from the property line of a parcel.... with a public park of Class I Bikeway...”, but Section 38.12.010.D.3. states “no outdoor canopy can be visible from a public right of way”. Which is it? Is it both? If both, then clarifying language should be placed in both sections.

Section 38.12.050 – Protection of Historic and Cultural Resources

Comment: Section 38.12.050 states:

“A use permit will be required if mitigation is recommended by the cultural resource survey or local tribe.”

There are various levels of mitigation recommended by cultural resource surveys, which can place restrictions on where construction can occur or that a monitor needs to be present. Minor and non-invasive mitigation measures should not trigger a discretionary permit.

Section 38.12.060 – Tree, Timberland, and Farmland Protection

Comment: Section 38.12.060 does not allow for diseased or fire damage trees to be removed. A licensed arborist can be required to determine if the tree(s) is diseased or fire-damaged and allow for removal by a license professional.

Section 38.12.070 – Protection of Biotic Resources

Comment: Section 38.12.070.A.3. states:

“A use permit will be required if the qualified biologist in the biotic resources assessment required by this chapter recommends mitigation measures.”

Biotic resource assessment invariably has recommendations for mitigation measures, but these vary in degree. Recommended mitigation measure can be that construction cannot occur during a specific time with noise levels above a certain level or if trees are to be trimmed, a biologist must first confirm the absence of nesting birds. Non-invasive mitigation measures should not trigger a discretionary permit.

Comment: Section 38.12.070.C. states:

“Cannabis cultivation and related structures and development cannot be located within Biotic Habitat Combining Zone, pursuant to Section 26-66 of Chapter 26 of the Sonoma County Code.”

However, Section 26-66-020 – Standards for biotic habitats states:

“A biotic resource assessment to develop mitigation measures may be required where the Director determines that a discretionary project could adversely impact a designated habitat area.”

In keeping with the requirements of Chapter 26, Section 26-66-020, cultivation proposed with a Biotic Habitat Combining Zone should simply trigger a discretionary permit application.

Section 38.12.080 – Fire Protection and Hazardous Materials

Comment: Section 38.12.080.A. states:

“The fire prevention plan must state how the development will comply with chapters 13 and 13A of this code, and”

Perhaps, for clarification and continuity of the language within this proposed chapter, it should state:

“The fire prevention plan must state how the development will comply with chapters 13 and 13A of the Sonoma County Code”

Thank You for your time and dedication towards a Sonoma County

Cannabis Ordinance that helps our industry grow and thrive to become a leading region for cannabis in California.

--

Best Regards,

Leanne Nakashima

Labor Resource Management Inc.

837 5th Street

Santa Rosa, CA 95401

Office: (707) 303-7575 ext

Direct: (707) 480-3296

Leannenakashima@lrteam.org

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From: [Leanne Nakashima](#)
To: [Cannabis](#)
Subject: Draft cannabis ordinance
Date: Thursday, March 18, 2021 9:43:47 PM

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Cannabis Ordinance that helps our industry grow and thrive to become a leading region for cannabis in California.

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From: [Randall Bettinelli](#)
To: [Cannabis](#)
Subject: Public Comments Cannabis Site Suitability
Date: Thursday, March 18, 2021 8:57:03 PM

EXTERNAL

When evaluating and prospecting for cannabis cultivation properties and proper set-backs for Cannabis cultivation I believe transparency and clarity is essential when acquiring property in Sonoma County.

The only way we can all be on the same page meaning the public and the County when looking for these properties is to rely on the accuracy of the Sonoma County Gis Cannabis Evaluation website and the Vesco cannabis site suitability maps when doing due diligence in purchasing eligible land.

It would be unfair to mislead the public while making educated decisions due to set-back requirements to follow the cannabis setback regulations while completing a cannabis cultivation application if these maps were not current and up to date.

It has been raised by further concerns from Planning Commission members who rely on these GIS maps for clarity who rely on these maps.

I would point out that Commissioner Pamela Davis District 5 had the same questions and concerns refereeing to GIS maps in the latest Planning commission meetings regarding setbacks.

The GIS maps are constantly updated and are to current setback tolerances for schools, parks, etc. not only for Cannabis but for development.

They need to be recognized as viable and current maps for people to observe the proper setbacks as it applies to Cannabis Cultivation.

Thank you,

Randall Bettinelli

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From: [Scott Orr](#)
To: [Cannabis](#)
Subject: FW: Cannabis Site Suitability
Date: Monday, March 22, 2021 9:37:13 AM

From: Greg Carr <Greg.Carr@sonoma-county.org>
Sent: Friday, March 19, 2021 11:26 AM
To: Scott Orr <Scott.Orr@sonoma-county.org>
Subject: Fw: Cannabis Site Suitability

after the close

From: Randall Bettinelli <randall601@yahoo.com>
Sent: Thursday, March 18, 2021 10:30 PM
To: Pamela Davis; Greg Carr; Caitlin Cornwall; Larry Reed; Gina Belforte; Jacquelynne Ocana; Cameron Mauritson
Subject: Cannabis Site Suitability

EXTERNAL

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Thank you,

Randall Bettinelli

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From: [district5](#)
To: [Cannabis](#)
Subject: FW: Cannabis grow setbacks in rural neighborhoods
Date: Friday, March 19, 2021 1:57:50 PM

From: Robert Nissenbaum <rnimagine@mac.com>
Sent: Thursday, March 18, 2021 6:41 PM
To: Greg Carr <Greg.Carr@sonoma-county.org>; Caitlin Cornwall <Caitlin.Cornwall@sonoma-county.org>; Todd Tamura <Todd.Tamura@sonoma-county.org>; Gina Belforte <Gina.Belforte@sonoma-county.org>; Scott Orr <Scott.Orr@sonoma-county.org>; Cameron Mauritson <Cameron.Mauritson@sonoma-county.org>; Pamela Davis <Pamela.Davis@sonoma-county.org>; Larry Reed <Larry.Reed@sonoma-county.org>; Andrew Smith <Andrew.Smith@sonoma-county.org>
Cc: Lynda Hopkins <Lynda.Hopkins@sonoma-county.org>; Tennis Wick <Tennis.Wick@sonoma-county.org>; David Rabbitt <David.Rabbitt@sonoma-county.org>
Subject: Cannabis grow setbacks in rural neighborhoods

EXTERNAL

Dear Planning Commissioners,

I live in West County. Almost all rural residents I have spoken with aren't anti-cannabis. What will prevent ongoing disputes between cannabis growers and rural residents is adequate setbacks to property lines, not residences, which greatly encumbers resident's use of their property.

If adequate setbacks of 600-1000 ft from property lines are established, then rural residents will learn to live with regulated cannabis. These are the distances recommended by Yolo, Napa, Mendocino and various other counties who have studied the issue.

Robert Nissenbaum
West County

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From: [Chelsea Holup](#) on behalf of [PlanningAgency](#)
To: [Cannabis](#)
Subject: FW: Right to farm
Date: Friday, March 19, 2021 3:29:30 PM

From: Rachel Zierdt <rzierdt@gmail.com>
Sent: March 18, 2021 5:49 PM
To: PlanningAgency <PlanningAgency@sonoma-county.org>
Subject: Right to farm

EXTERNAL

Dear commissioners,

Shame on county staffers including AG commissioner not doing any homework and knowing other county regulations as Sonoma County moves ahead. Why don't they see what has worked and not worked in other counties?

Rachel zierdt

In central coast newsletter....

“Cannabis will be considered a qualifying crop for meeting requirements of the Williamson Act and other agricultural preserve contracts, but it won't be afforded the protections other crops receive under Santa Barbara County's Right to Farm Ordinance.”

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From: [Pamela Davis](#)
To: [Cannabis](#)
Subject: Fw: BLOOMFIELD 300" BUFFER MAP
Date: Thursday, March 18, 2021 7:25:33 PM
Attachments: [300" buffer map2.pdf](#)

From: Valorie Dallas <valoriedallas@gmail.com>
Sent: Thursday, March 18, 2021 6:13 PM
To: Pamela Davis
Subject: Fwd: BLOOMFIELD 300' BUFFER MAP

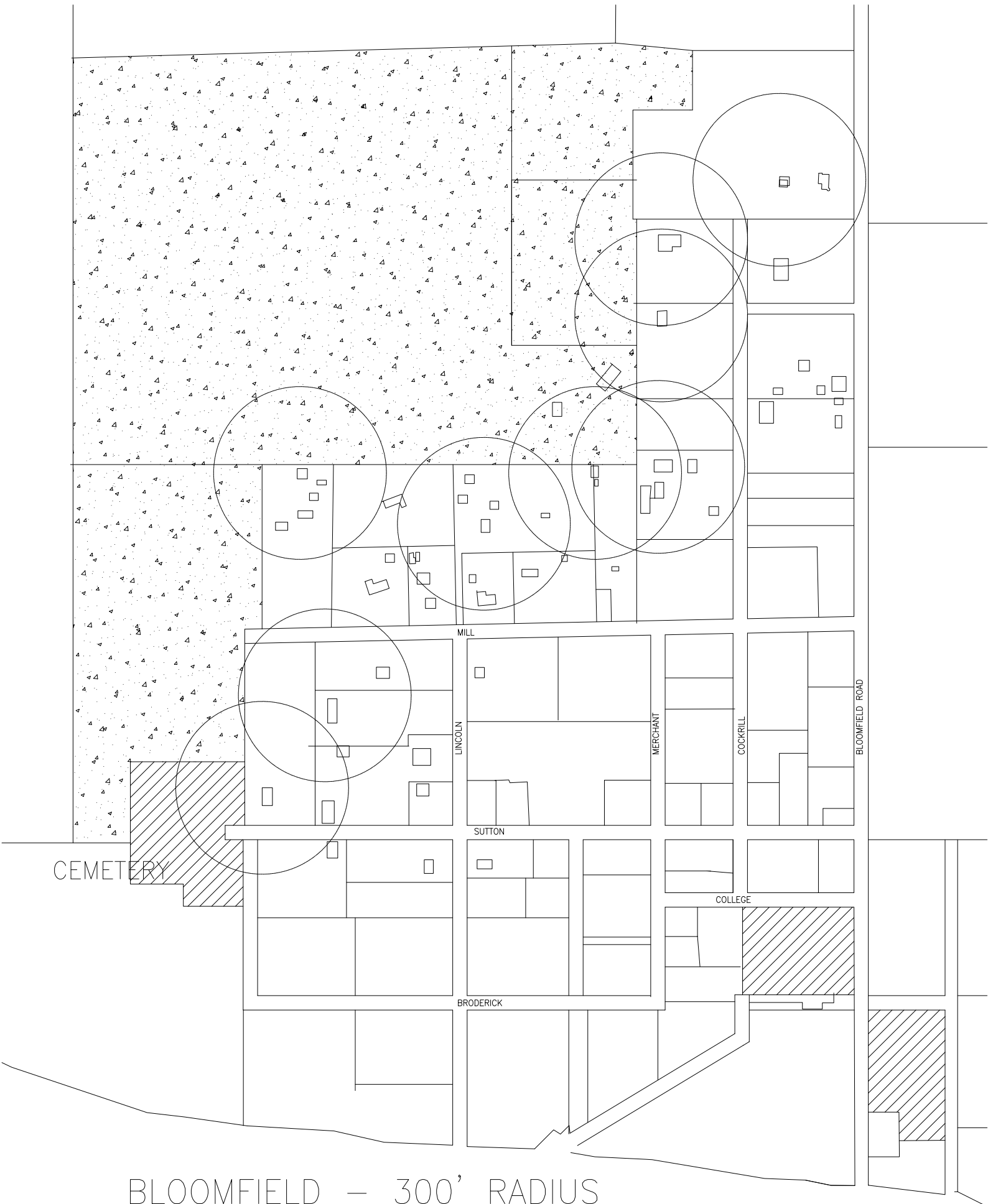
EXTERNAL

I just heard you ask this question about buffers/setbacks. Here is a map of Bloomfield and how the 300 foot setback will affect us. Any questions, let me know.

Thanks,
Valorie Dallas

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BLOOMFIELD — 300' RADIUS

From: [Jennifer Klein](#)
To: [Cannabis](#)
Subject: Fwd: Factual information
Date: Friday, March 19, 2021 5:03:06 PM

Sent from my iPhone

Begin forwarded message:

From: Deborah Eppstein <deppstein@gmail.com>
Date: March 19, 2021 at 4:00:08 PM PDT
To: Scott Orr <Scott.Orr@sonoma-county.org>, Jennifer Klein <Jennifer.Klein@sonoma-county.org>, Andrew Smith <Andrew.Smith@sonoma-county.org>
Cc: Tennis Wick <Tennis.Wick@sonoma-county.org>
Subject: **Factual information**

EXTERNAL

Dear All,

I attended the Planning Commission meeting discussing the proposed new cannabis ordinance chapter 38, the SMND and proposed changes to chapter 26. I was appalled that staff did not know what was in their documents, including the proposed chapter 38 and modifications to chapter 26. A few examples include

- 1) not knowing that the 10% of parcel limitation was specified only for outdoor and hoop houses (38.12.030), whereas indoor cultivation in existing permanent structures was unlimited, and the limit on new structures was again additive.
- 2) Not knowing what the definition of hoop houses was, or what permits would be required for the electrical, plumbing and mechanical that would now be allowed. Mr. Smith first stated only a fire operational permit but no building permits, yet then also stated a building permit would be required, then said that was only for a greenhouse. Which is it?
- 3) Not understanding the big differences between the amended chapter 26, effective March 11, and the prior chapter 26 where the staff comments were shown. Are you aware that the definition of hoop houses was eliminated in the amended chapter 26? Thus the current cannabis ordinance now has no definition of hoop houses. Or was the

intent that the new definition in chapter 38, allowing electrical, plumbing, mechanical, and where light deprivation is no longer prohibited now apply to chapter 26 even before chapter 38 is adopted? This would be a major change to the current cannabis ordinance.

I and others have pointed out numerous other errors and inconsistencies in chapter 38 and the SMND- eg how setbacks are measured, missing mitigation measures, what criteria apply to manufacture of cannabis product (extracted THC oil and edibles) under the allowed activities of a ministerial permit (38.14.020) and was it intended that this can indeed be done on site with no use permit, no longer required to be in an industrial zone as in chapter 26, and many more.

I sincerely hope that prior to the next hearing on March 25, staff will carefully read chapter 38 and the SMND so that the Planning Commissioners questions can be correctly answered. The public is very well informed on these matters; it seems very wrong that when we hear staff make misstatements, we cannot provide a correction.

Thank you for your attention to this critical matter.

With best regards,
Deborah A Eppstein, PhD
Sonoma County
801-556-5004

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From: [Harriet Buckwalter - FMWW](#)
To: [Cannabis](#)
Cc: [Carmen Borg](#); [Raymond Krauss](#)
Subject: Missing Exhibits
Date: Friday, March 19, 2021 4:35:06 PM

EXTERNAL

Hello,

When I downloaded the last of the public comments that were submitted yesterday after 9:45AM and before the hearing began, I do see that you have the letter submitted on behalf of Friends of the Mark West Watershed, thank you. What I do not see are the exhibits that were submitted along with the letter. Can you please confirm that the exhibits will be available for public viewing as part of our submission? They are part of the public comments.

Thank you,
Harriet

--

Harriet Buckwalter

Co-Chair, Friends of the Mark West Watershed
Upper Mark West Watershed Fire Safe Council
6985 Saint Helena Road
Santa Rosa, CA 95404
hbuck@sonic.net
(707) 538-5307
markwestwatershed.org

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Going Big

Cannabis organization opposes Sun Valley's large pot farm
BY THADEUS GREENSON

COUNTY ON THE MARGINAL

The proposed site of Arcata Land Co.'s proposed 23-acre cannabis cultivation operation on the outskirts of Arcata.

Humboldt County's largest cannabis trade organization has come out in opposition to a proposal to construct a 23-acre cannabis farm in the Arcata bottoms, largely on the grounds that the project is just too big.

"Historically, [the Humboldt County Growers Alliance] has supported many cannabis projects before the Planning Commission, while remaining neutral on others," reads the alliance's March 15 letter to the commission. "Previously, however, HCGA has not formally opposed any specific cannabis project in Humboldt County. The scale of the proposed project, however, as well as its violation of a number of land use principles that guide other cannabis projects in Humboldt, have led our members to overwhelmingly express their opposition to this project as proposed, and our policy committee to adopt the position in this letter by a vote of 9-0."

The proposal — put forward by a sister company of Sun Valley Floral Farms — would see a 23-acre greenhouse growing operation spanning more than 1 million square feet erected on a 38-acre former mill site between Foster Avenue and 27th Street, near Sun Valley's existing bulb farm. If approved (as the Journal went to press it was slated to go before the Humboldt County Planning Commission for a conditional use permit hearing March 18, with the commission's decision appealable to the board of supervisors) the project would be by far the largest cannabis farm in Humboldt County, and one of the larger legal operations in Northern California.

But the HCGA's letter is only the latest in what is shaping up to be fierce opposition to the proposal, as hosts of neighbors, Arcata residents and environmental groups concerned about the project's potential impacts to area traffic, air quality, light pollution and water. Some have also argued that environmental review on the project has been insufficient and should have included a full environmental impact report rather than the less exhaustive mitigated negative declaration — used for projects where it's determined all environmental impacts can be mitigated into insignificance.

The project is being proposed by the Arcata Land Co., LLC. Though technically a stand-alone entity, it is owned by Sun Valley Floral Farms CEO Lane DeVries as its principal and, according to a source, by Lost Coast Outpost, the Sun Valley CEO is said to have lumped

about the author



Thadeus Greenson

thad@northcoastjournal.com

@ThadeusGreenson Follow 631 followers

Bio: Thadeus Greenson is the news editor of the North Coast Journal.

more from the author

County Records 36th COVID Death, 14 New Cases

By Thadeus Greenson

Protestors Call for Firing of EPD Officers Involved in Reported Text Message Scandal

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the two companies' interests together, saying the move into cannabis was necessitated by Sun Valley's economic struggles. (DeVries did not immediately respond to a *Journal* message seeking comment for this story.)

The proposal would include 17.2 acres of light-deprivation greenhouses and 5.7 acres that would be operated as mixed light, meaning they use both natural sunlight and grow lights. For the mixed-light greenhouses, the staff report states "strict adherence to night sky standards will be achieved" with light and glare controlled by using "blackout plastic/fabric" to cover the structures and keep light from escaping.

In its letter, HCGA points to the staff report's estimate that the project will not demand any more than 1.9 megawatts of electricity at any time, which would be 1.7 percent of the entire county's average energy demand, according to a report from Schatz Energy Research Center.

Water for the operation would come from a well on the property, which an initial study has shown would supply more than enough to serve the project. The greenhouses would be outfitted with large fans and carbon filters to mitigate smell. If that proves insufficient, they would also use odor neutralizers such as Ecosorb, which bills itself as a "natural industrial odor control" system that uses non-toxic, plant-based products to break down and neutralize odor molecules.

Currently, the property has some greenhouses used to grow flowers, with adjacent fields used to grow both flowers and mixed row crops, according to a county staff report. About 40 full-time equivalent employees currently work the site — a number that would jump to about 115 if the cannabis operation is approved.

In comments to the Lost Coast Outpost, DeVries stressed the project is really about keeping people employed locally, noting that the domestic flower industry was already in a tough spot with international competition and rising labor costs when COVID-19 hit, wiping out 2020's lucrative Easter season, further raising costs and limiting markets.

This project, he said, "would allow our company to continue operations and continue the employment of 450 people. The well-being of them and their families is depending on the approval of this project."

And seemingly in anticipation of the concerns of some within the cannabis industry, DeVries told the Outpost that it's not "necessarily" Sun Valley's intent to be competitive with other local operations and the project "helps Humboldt stay relevant in the California cannabis market."

DeVries is certainly correct that other areas of the state are in the process of permitting large-scale cultivation. Last month, Santa Barbara County rejected an appeal of an 86.8-acre cannabis cultivation project and, closer to home, the Halo Collective announced plans to cultivate two harvests of 60 acres of cannabis per year on a 1,600-acre property in Lake County. (Halo's partner company in the project, Green Matter Holding Inc., has a sister company in Humboldt County — Humboldt Standard — that once boasted the largest legal grow in California on 8.5 acres in Willow Creek.)

In its letter, HCGA makes clear it disagrees with DeVries' take that scaling up is necessary for Humboldt County to stay relevant. First off, the alliance argues that Humboldt County is home to 30 percent of the state's cannabis farms and currently leads California in both cultivation licenses and independent farms by a large margin. And the average size of Humboldt County's farms is currently half an acre, the alliance writes.

County Records 36th COVID Death, 14 New Cases

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"While it is correct that large-scale cultivation is occurring elsewhere around the state, with several 20-plus acre cultivation projects approved on the Central Coast and parts of Northern California, the existence of these industrial scale projects in traditional agricultural regions only increases the importance of preserving Humboldt's reputation for small-scale, craft and independent production," the alliance writes. "While Humboldt will never compete with traditional agricultural regions in terms of size and scale of production, it is well positioned to compete on craft, quality, terroir and a global reputation for high-quality, artisan cannabis.

"... Additionally, the proposed project site in the cold, wet and foggy Arcata bottoms, which is poorly suited to cannabis flower production, provides no conceivable benefit for the reputation or quality of the Humboldt brand, and only threatens to increase misinformation that Humboldt County has become dominated by industrial-size farms post-legalization," the letter continues, adding that the alliances understands it's not the planning commission's job to "vet the quality of cannabis" a project will produce.

It's worth noting the project as proposed is only possible due to the Heavy Industrial zoning of the property, which — in contrast to other zoning designations — leaves the planning commission total discretion to decide when a project is too big. That will leave the commission (and potentially later the board of supervisors) to wrestle with the competing interests of a company trying to save and even create jobs and a neighborhood concerned about impacts, while also charting the best course forward for one of Humboldt County's largest industries.

— *Thadeus Greenson (he/him) is the Journal's news editor. Reach him at 442-1400, extension 321, or thad@northcoastjournal.com. Follow him on Twitter @thadeusgreenson.*

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NCJ North Coast Journal
40 minutes ago

Few details are available following the discovery of skeletal remains near the Fields Landing boat ramp.



NORTHCOASTJOURNAL.COM

Skeletal Remains Found Near...

The Humboldt County Sheriff's Offic...

2 Comment Share

NCJ North Coast Journal
2 hours ago

Nearly lost to extinction in the 1980s, California condors are integrally cted to the Yurok Tribe and in the region, where the last ed sighting was near Drain, n, in 1940.

he majestic bird will soar in the oldt skies again.

[rniacondor](#) [#Yurok](#)

[macyGoNeesh](#)



speaking of...



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In Lake County, I manage 54 acres of outdoor cannabis grown as a row crop in native soil. I believe it would be good for Humboldt County to host this farm. We all have to face the fact that big cannabis is inevitable. Don't just face it...embrace it.

[report](#)

1 like, 2 dislikes

[like](#)

[dislike](#)

Posted by **Wayne S.** on 03/19/2021 at 5:18 PM



Let's put some people to work. Get all these people that are making our pristine county look bad .We can perhaps shine again . At least approve 12 acres or more . Arcata which missed being the county seat by days, should be able to accommodate this industry given location etc. This company will likely be given permission anywhere else. Export more revenue for all out of our county and continue seeing homeless everywhere . There is no need for tree huggers to voice there opinion here. It's just bottom land , cows and mills have had there turn with very little revenue. If we don't up our game japan will have floating greenhouses and decimate our only chance at something .

[report](#)

1 like, 5 dislikes

[like](#)

[dislike](#)

Posted by **Roger Bar** on 03/19/2021 at 3:53 AM



What time is the Grow issue on Access channel 11 tonite

1 like, 1 dislike

[like](#)

[dislike](#)

Posted by **NIPPER1** on 03/18/2021 at 10:12 AM

From: Citro@sonic.net
To: [Cannabis](#)
Subject: North Coast Journal: Recommended article from Nancy Citro
Date: Friday, March 19, 2021 4:33:31 PM

EXTERNAL

Nancy Citro (Citro@sonic.net) has sent you the following from North Coast Journal:

Message: For the record, Humboldt County Cannabis trade organization recommended against approval of this 23 acre greenhouse project before the Planning Commission.
Too big they say.

RE: article
"Going Big"
<https://www.northcoastjournal.com/NewsBlog/archives/2021/03/18/going-big>

(To view the article, please click the above link.)

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From: [Roger Peters](#)
To: [Cannabis](#)
Cc: [Scott Orr](#); [Jennifer Klein](#)
Subject: ORD20-0005 Fair Argument re lack of assessment of potential groundwater impacts and need for an EIR
Date: Friday, March 19, 2021 10:49:30 AM

EXTERNAL

Yesterday I sat through most of the Planning Commission hearing on ORD20-0005, including the Commissioner comments and questions. During that later phase, after the public hearing was closed, the PC was joined by Jerry Hittleman of Rincon Consultants Inc. I gather from the introduction that Mr Hittleman was largely tasked with preparing the SMND. Based on the questions from the Commissioners, and Mr Hittleman's and other Sonoma County staff members responses, it seems apparent that the Supplemental Mitigated Negative Declaration (SMND) has not adequately addressed the potential water impacts of adopting the draft ordinance as currently proposed. I am submitting these comments at this point in the hope that they will be considered for action prior to the continuation PC meeting set for March 25th.

One of the initial questions to Mr Hittleman from the Commissioners was how many acres of land might be implicated by the ordinance. I believe his response was that there were 600,000 acres of agricultural land in Sonoma County and so at a 10 per cent ratio of cannabis cultivation he thought there was something like 60,000 acres of land that might be entitled to take advantage of the ordinance. Setting aside the difference between acres on the various parcels and the total ag acreage, I got the distinct impression that there is no formal technical assessment (in the SMND or otherwise) addressing the potential aggregate groundwater usage by basin due to cannabis farming in the relaxed permit environment the ordinance offers. Mr Hittleman went on to say that under CEQA the County would have to look at the maximum possible use, or the 60,000 acre potential. If that happened during preparation of the draft SMND it is not evident in the SMND writeup. The SMND does not address and discuss the impacts of any such maximum case on groundwater use, either generally or by reference to specific basins. The SMND does indicate that 80% of the ag land is located in water Zone 3 or 4. That does suggest that a disproportionate impact of any increased cannabis grows under a maximum use scenario will very likely also occur in high priority water areas. The absence of publicly shared technical support for the conclusions as to hydrological impact of the ordinance is troubling.

Another Commissioner asked how cumulative water impacts were being assessed. That Commissioner indicated that the PC was familiar in the winery context of having to look at the water use of a particular use permit applicant and try to understand whether there were many more similar proposals in the pipeline adjacent to the project site being considered that together might have a significant cumulative impact. She wondered whether that might be the case here and how that was addressed. Mr. Hittleman indicated that in Zone 3/4 areas there would need to be a hydrologic report prepared *which would then be evaluated by the County staff to determine whether there was any needed mitigation*. Mr Orr confirmed that if the review indicated there was a need for mitigation that would pull the permit application out of the ministerial program and shift it to a use permit. In essence, that is an acknowledgement that the process proposed to be undertaken under ORD20-0005 will not in fact a ministerial one, since the applicant has to submit for review by staff and acceptance a hydrologic report prepared by a qualified professional demonstrating and concluding that the commercial cannabis use will not impede the basin or aquifer from meeting the adopted groundwater

sustainability goals set out under SGMA. Any such hydrologic reports should be made publicly available, and at a minimum be reviewed and vetted by the SCWA and the applicable basin Groundwater Sustainability Agency (SGA) staff/consultants. That sort of deferred mitigation may prove useful in Zone 3/4 areas, but it does not apply to Zone 1/2 areas. Nor does it address the fact that those Zone 1-4 system is badly out of date and in need of confirmation as to present status. As for the Commission's question about how the SMND addressed the cumulative impact issue, Mr Hittleman simply did not answer the question posed. Did he assess the potential cumulative impact the ordinance would have on groundwater of multiple cannabis grow permits bunched in generally adjacent areas within a basin?

The responses by Mr Hittleman and staff taken together do not suggest the SMND can be fairly be said to have adequately assessed the potential adverse impacts on groundwater resulting from adoption of the proposed ordinance. Too many questions are unanswered--assumptions regarding numbers of permits expected, variations in water usage by area, likely grow locations, variations in groundwater structures and aquifers, recharge potential, surface/groundwater interactions, etc.. Yet it is apparent that cannabis as a commercial crop is a reasonably water intensive use. Although it would have been helpful if instead of comparing water use for cannabis to tomatoes or corn, the reference comparison had been to vineyard water use, there is no question that Mr Hettleman's "maximum" case of 60,000 acres of cannabis would constitute a significant draw on groundwater, and potentially interconnected surface water. The SMND's failure to engage on those questions renders is inadequate as a CEQA compliant document in terms of the potential environmental impacts of adoption of the ordinance.

That lack of adequate analysis is in some sense not surprising, since the three GSAs in Sonoma County that cover the basins that would be affected by the ordinance have themselves not yet integrated the potential groundwater use impacts of the shift to commercial cannabis the ordinance would invite. The Advisory Committee of the Sonoma Valley GSA has specifically requested the staff supporting the development of the SV Groundwater Sustainability Plan (SVGSP) to include the potential for cannabis ag crops to impact groundwater. The SMND incorrectly states on pg 75 that the SV GSA "has completed a draft GSP for the Sonoma Valley Subbasin" The AC and the staff working on the SVGSP have not completed its work, there is no completed draft GSP, and the Sonoma County Water Agency staff working on this matter has not reported back on the water budget impacts and other groundwater concerns (lowering groundwater levels, reduction in gw storage, depletions of interconnected surface water etc) resulting from increased commercial cannabis crop activity.

The bottom line conclusion is that at this point in time a "fair argument" indeed exists that the SMND in its current form does not adequately assess the reasonable probability that enhanced groundwater consumption and other potentially adverse groundwater impacts will result from the adoption of an ordinance that transforms permitting of cannabis agricultural activities from a discretionary project into a ministerial permit. The deferred mitigation approach in the SMND that requires cannabis permit seekers in certain zones (zones 3/4), but not others (zones 1/2), to tender a hydrologic study that "demonstrates and concludes" that the commercial cannabis use will not result in or exacerbate adverse impacts that preclude meeting the sustainability goals of the GSA, as detailed in SGMA, is simply not a substitute for an up front analysis of the aggregate impacts of the ordinance itself on both surface and groundwater. The time for that assessment, certainly from an aggregate and cumulative

perspective, is before the ordinance is adopted.

The Planning Commission, or the Board of Supervisors in the absence of action to that effect by the PC, should direct the staff to undertake the necessary studies to fairly assess the potential impact of the cannabis ordinance on groundwater use and sustainability. That assessment should be done on a basin by basin basis. The fact that the SMND does not even identify Section 10 Hydrology and Water Quality as an environmental factor that would be potentially affected by the ordinance (SMND, pg 7), and has given only a glancing comment regarding the cumulative groundwater impacts of broad based increases in cannabis growing as a result of the shift to a ministerial permit process (see Section 21(b), Mandatory Findings of Significance), is telling of the lack of an adequate benchmark analysis.

This ordinance will directly and potentially significantly impact the use of groundwater in the aquifers and basins in Sonoma County, and most certainly in the Sonoma Valley. CEQA requires more investigation than the staff and its consultant has delivered in the SMND by way of analysis. The SMND in its current form does not clear the threshold required under CEQA as to hydrological impacts. It should either be returned to staff for that further analysis, or be set aside to allow that analysis to occur in an EIR. In undertaking that analysis staff should work closely with the SCWA and the applicable GSAs who are tasked with a similar exercise relating to groundwater generally.

Roger Peters

Roger Peters
Hoff Road
Kenwood, Ca.

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From: [Rachel Zierdt](#)
To: [Cannabis](#)
Subject: Fwd: What have other counties done?
Date: Friday, March 19, 2021 4:55:17 PM

EXTERNAL

----- Forwarded message -----

From: Rachel Zierdt <rzierdt@gmail.com>
Date: Fri, Mar 19, 2021 at 3:59 PM
Subject: What have other counties done?
To: Andrew Smith <Andrew.Smith@sonoma-county.org>, Jennifer Klein <jennifer.Klein@sonoma-county.org>, Scott Orr <Scott.Orr@sonoma-county.org>, Tennis. Wick@sonoma-county.org (<Tennis.Wick@sonoma-county.org> <Tennis.Wick@sonoma-county.org>

Dear Mr. Orr, Smith, Wick, and Ms. Klein

At the town hall meetings last week, I asked if the county had researched to see what has worked and not worked in other counties. Why duplicate mistakes?...why not try to herald successes? Apparently that fell on deaf ears since a simple question during the PC meeting asking what other county in California has right to farm.....a very basic question found the county staff flatfooted.

Is it not important to find out baseline information? Also lack of knowledge causes staff (Mr. Smith for one) to say that someone is wrong when actually it is staff who doesn't know or fully understand the ramifications and implications of their own legislation (in one instance - hoop houses.)

I know that the county loves to have its staff exercise discretion so they can "wing"(my word, not yours) situations...but possibly giving the commissioners false, inaccurate, or maybe potentially misleading information is dangerous. The PC members are relying on better information so that they can make informed decisions. In my opinion, too much information to be absorbed in a less than hour presentation but that is the process. It is evident they are relying on you to give them guidance to understand the nuances. Accuracy is imperative.

Please make sure that during the continuation meeting that staff is a bit more up to speed and gives correct information.

Rachel Zierdt

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From: [Ron Grassi](#)
To: [Cannabis](#)
Subject: Disapproval to encouragement of cannabis in Sonoma County
Date: Friday, March 19, 2021 12:28:12 PM

EXTERNAL

We are residents of Sonoma and moved here because of the beauty of Sonoma County including the vineyards that dot our landscape. We are concerned with the plans to encourage and ease restrictions for the cultivation of cannabis. There are at least 3 important concerns that must be addressed.

1- The odor of the cannabis plant is absolutely unpleasant and it is impossible to contain this odor. Sonoma residents should not have to deal with this skunk-like odor.

2- The water that is needed to grow this crop is off the charts compared to other agricultural crops. We need to take into account that our climate is changing and so is our water supply. With all the new development already happening in Sonoma and the further demand for water associated with the growth of cannabis, there is simply not an adequate water supply available.

3- Frankly, it's difficult to understand any decision to approve these cannabis projects except that they're offering to buy their way into our county.

Please do not let this industry change the character of Sonoma County. Do not change our land use rules. There are more appropriate areas in the state where cannabis could be grown without such conflicts.

Thank you for your attention to this serious situation.

Regards, Sally and Ron Grassi

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From: [Chelsea Holup](#) on behalf of [PlanningAgency](#)
To: [Cannabis](#)
Subject: FW: Support cannabis expansion
Date: Friday, March 19, 2021 3:31:04 PM

-----Original Message-----

From: Vivien Hoyt <vivienhoyt@vom.com>
Sent: March 19, 2021 3:05 PM
To: [PlanningAgency](mailto:PlanningAgency@sonoma-county.org) <PlanningAgency@sonoma-county.org>
Subject: Support cannabis expansion

EXTERNAL

Dear Sir/Madam,

I used to be very against cannabis until I got cancer and needed chemotherapy and radiation. This healing plant helped me with nausea, pain, inflammation, and burns. It worked much better than the pharmaceuticals prescribed by Kaiser. My conservative 82 year old mother also started using the CBD cream for arthritis. Please move forward with plans to expand the growth of this healing plant. Thank you for adapting to the times.

Best regards,

Vivien Hoyt
Brush Creek
Rincoln Valley

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From: [district5](#)
To: [Cannabis](#)
Cc: [Leo Chyi](#)
Subject: FW: Issue: Restrict Marijuana farms in residential unincorporated Sonoma county
Date: Monday, March 22, 2021 1:25:17 PM

JW

-----Original Message-----

From: no-reply@sonoma-county.org <no-reply@sonoma-county.org>
Sent: Saturday, March 20, 2021 7:43 AM
To: district5 <district5@sonoma-county.org>
Subject: Issue: Restrict Marijuana farms in residential unincorporated Sonoma county

Sent To: County of Sonoma

Topic: Issue

Subject: Restrict Marijuana farms in residential unincorporated Sonoma county

Message: I strongly oppose marijuana farms without significant restrictions in rural residential areas. Living in Occidental I have had personal experience with this.

Marijuana growth areas bring an element of crime not found with other crops

. In our neighborhood a shooting occurred on our residential road over a conflict with the marijuana farmers. This does not happen with grape growers.

Our incident on Taylor lane outside of Occidental is not an isolated event but a trend with these farms it is a problem

Do not allow marijuana growth and the crime that it brings into our rural residential neighborhoods

Sender's Name: Audrey Desky
Sender's Email: audreydesky@gmail.com
Sender's Home Phone: 7078749093
Sender's Cell Phone: 7075367173
Sender's Address:
17556 Taylor Lane
Occidental, CA 95465

From: [Matthew Pak](#)
To: [Cannabis](#)
Subject: RE: SoCo Cannabis Ordinance
Date: Saturday, March 20, 2021 7:45:20 AM

EXTERNAL

Dear Board of Supervisors and County Staff,

We hope this finds you healthy and safe. We appreciate your attention to the below amendments to the Sonoma County Cannabis Ordinance Draft.

You released a draft copy of the zoning regulations and an amendment of the general plan, but they contradict each other.

- In the zoning regulations under the definition of "crop production" please remove "except cannabis" to match the General Plan amendment.
- I support and appreciate the change in the General Plan to classify cannabis as agriculture.

After reviewing the Chapter 38 draft ordinance, I have the following comments:

- Please align the Sonoma Cannabis Ordinance where applicable to state laws.
- As state laws continue to evolve, the Sonoma County ordinance should change with it.
- Nurseries should be prioritized as there is a local supply chain shortage and traveling and spending monies outside our county. That is money that is leaving our county and creating unnecessary carbon impact. Let's keep our money and our farming in Sonoma County.
 - Please clarify that the new ordinance removes the sqft. cap on nurseries
- Please create an advisory committee for cannabis or agriculture in general. There must be more transparency between county staff and the industry.
-

Please create a pipeline for the original applicants that have been stuck in line at PRMD. Give priority to them without additional fees. They were supposed to have a head start and get priority processing, but are stuck in queue. Now you are allowing 10% canopy without getting them permits first.

- I support 5-year permits and the allowance of ministerial permits in LIA and RRD.
- I would like to see RR and AR added back, as a right to farm in Sonoma County. (Small farming is essential in our agricultural county.)
- Please release the site-specific environmental documents that will be used to satisfy CEQA at the state level.
- The state already has strict enough restrictions for water use. Please remove the new water restrictions you have added and treat us like other agriculture commodities.
- Please don't put caps on propagation. If it is used on-site, it should not be limited by square footage. Plants grow very quickly and must be held until they are used. We have strain banks and Mother Stock that must be kept alive. This requires extra space.
- Regarding the language around forests in 2016, please allow an exception for areas deforested via wildfires. These areas no longer have living trees on them and should not be disqualified.
- Please link interactive maps for the "Important Farmlands" and "Critical Watersheds" so those areas are known and easily referenced in the Sonoma County Code.
- Please remove the requirements for plant screening of Cannabis farms. (Other crops are not subjected to this) They draw attention to the fact that there is a cannabis farm behind a fence as opposed to a horse or dog, they cost extra money, and they use extra water.
- Please remove the requirement of carbon/air filters for indoor, greenhouse and nurseries on ag and resource properties. These smells are already mitigated by large parcel sizes. Also, many if not all of these properties will be eligible for

outdoor growing making the filters a moot point. They are expensive and a waste of carbon and energy resources. Lastly, hemp is now allowed and also smells the same as cannabis, because they are essentially the exact same plant.

- Please remove the requirement for an emergency to be government declared (**Example:** There may be a power outage on a single parcel that will still create an emergency for that farmer. They must be able to pump water or turn on lights to save their crop.)
- **Please treat us like other ag and don't threaten us with misdemeanors.**
- Don't give "Stop Work" orders unless there is due process. This may allow a whole year's worth of crop to be lost over a misunderstanding. This should only occur during the most serious offense and after arbitration.
- We should be allowed to truck in recycled water to reduce pressure on groundwater. It should actually be encouraged. Water catchment systems should also be incentivized.
- Please remove the plant count (25 Plants) for cottage outdoor permits. - Align with the state which has removed the plant count.
- How will the county deal with the Board of Forestry's new Fire Safe Ordinance? Will farms be required to have 20 foot wide roads? Will that only be required if there is new construction? Or are you changing the zoning code to classify us as an agricultural crop?
- Will Self-Transportation be allowed for cultivators?
- Will Self-Transport be allowed for Nursery Operators?
- How will renewals be handled?

Thank you for the considerable staff time it took to organize and edit these documents. I look forward to continuing to advocate for the cannabis industry.

Sincerely,

Matthew Pak

--

Matthew Pak

Operations Manager

www.CosmicDistribution.com

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From: [Brian Connell](#)
To: [Cannabis](#)
Subject: Cannabis in Bennett Valley
Date: Monday, March 22, 2021 6:55:55 PM

EXTERNAL

Dear Ms. Gorin:

My wife and I raised our family in Bennett Valley and we've been residents here for over 20 years on Grange Road. The idea of widespread cannabis cultivation in Bennett Valley is, to say the least, very distressing.

Bennett Valley is indeed rural but much more populated than, say, areas of West County. Allowing as much as 470 acres of rural Bennett Valley to be cultivated to cannabis would be disastrous for the residents who enjoy their right to peaceful and quiet enjoyment of their homes.

Widespread cultivation of cannabis in Bennett Valley would result increased traffic on already high traffic roads, unsightly structures and noise for those located nearby to cannabis farms. Then there is the issue of crime.

We implore you and your fellow supervisors to restrict cannabis cultivation in rural residential areas like Bennett Valley. It's a bad idea and has the potential to disrupt many lives.

Sincerely,

Brian and Sally Connell
Bennett Valley

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From: [Brian Connell](#)
To: [Cannabis](#)
Subject: Cannabis cultivation in Bennett Valley
Date: Monday, March 22, 2021 6:58:53 PM

EXTERNAL

To whom it concerns:

My wife and I raised our family in Bennett Valley and we've been residents here for over [20 years on Grange Road](#). The idea of widespread cannabis cultivation in Bennett Valley is, to say the least, very distressing.

Bennett Valley is indeed rural but much more populated than, say, areas of West County. Allowing as much as 470 acres of rural Bennett Valley to be cultivated to cannabis would be disastrous for the residents who enjoy their right to peaceful and quiet enjoyment of their homes.

Widespread cultivation of cannabis in Bennett Valley would result increased traffic on already high traffic roads, unsightly structures and noise for those located nearby to cannabis farms. Then there is the issue of crime.

We implore you and your fellow supervisors to restrict cannabis cultivation in rural residential areas like Bennett Valley. It's a bad idea and has the potential to disrupt many lives.

Sincerely,

Brian and Sally Connell
Bennett Valley

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From: [Chelsea Holup](#) on behalf of [PlanningAgency](#)
To: [Cannabis](#)
Cc: [Scott Orr](#)
Subject: FW: ORD20-0005
Date: Tuesday, March 23, 2021 11:36:16 AM

From: Rick Coates
Sent: March 22, 2021 4:09 PM
To: PlanningAgency
Subject: Re: ORD20-0005

EXTERNAL

This is a threat to forests. All commercial pot farms should be subject to CEQA review even within agricultural zoning. Some ag zones have forest and most have oak woodland.

Rick Coates
Executive Director
Forest Unlimited
707-632-6070 or rcoates@sonic.net

Please consider the environment before printing this email

"It is the first responsibility of every citizen to question authority."
---Ben Franklin

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From: [Sonia Taylor](#)
To: [Scott Orr](#); [Cannabis](#); [Chelsea Holup](#)
Subject: Re: Cannabis PC Meeting on 3/18
Date: Monday, March 22, 2021 9:58:17 AM

EXTERNAL

Thanks for the information, Scott.

I look forward to receiving a link for the video as soon as possible.

Sonia

Sonia Taylor
707-579-8875
great6@sonic.net

On 3/22/2021 9:08 AM, Scott Orr wrote:

> Hi Sonia, I have copied one of our admins to assist on the recording request. It may not be done processing yet. Jerry Hittleman from Rincon worked with the cannabis program manager on the MND. It is standard practice for someone at Permit Sonoma to be the primary contact/signatory on an MND when a consultant prepares work on behalf of the county. I've copied the cannabis program who is the lead on the project for the purposes of your other questions.

>

> Scott

>

> -----Original Message-----

> From: Sonia Taylor <great6@sonic.net>

> Sent: Sunday, March 21, 2021 9:36 AM

> To: Scott Orr <Scott.Orr@sonoma-county.org>

> Subject: Re: Cannabis PC Meeting on 3/18

>

> EXTERNAL

>

> Scott, can you send me a link to the recording of the Planning Commission meeting that occurred on Thursday, 3/18?

>

> Although I took notes, that doesn't mean they were accurate, and I'd like to be accurate before I send you a substantive email.

>

> Also, can you send me the name of the consultant, including the firm name, who attended the meeting? And can you confirm for me that they prepared the SMND in this matter? The only name I recall on the SMND was YOURS, and so I'm interested in who actually prepared it.

>

> The one thing I can say that I found irritating for certain at the PC meeting was when the consultant understated the number of acres being opened to cannabis activities by the proposed Chapter 38 and the SMND by

> 50,000 + acres -- which is just about the number of acres in Sonoma County's current voter protected Community Separators.

>

> I hope prior to the continued PC meeting on 3/25 the consultant will have time to review the SMND and be up on what it actually says. He should understand that a large number of people interested in this issue have very recently read the SMND and are fairly conversant with what it says...

>

> Thanks, again, for your response.

>

> Sonia

>

> Sonia Taylor

> 707-579-8875

> great6@sonic.net

>

>

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From: [Sonia Taylor](#)
To: [Chelsea Holup](#); [Scott Orr](#); [Cannabis](#)
Subject: Re: Cannabis PC Meeting on 3/18
Date: Monday, March 22, 2021 10:05:58 AM

EXTERNAL

Thanks so much, Chelsea! The link below broke up, but I was able to make it work (copy and paste is a miracle!).

Your promptness is MUCH appreciated.

Sonia

On 3/22/2021 9:59 AM, Chelsea Holup wrote:

> Sonia, the recording can be located here: https://sonomacounty.zoom.us/rec/share/Wx-9pGVzQ8IO_Js2QPdjYHrrDdlRd0znYs4NvN7CKHALjRa17zkb3f8KsTOa09IG.cXHPH4h1pdPWXH7O
> Passcode: bxUf2!P4

>

>

> -----Original Message-----

> From: Scott Orr

> Sent: March 22, 2021 9:09 AM

> To: 'great6@sonic.net' <great6@sonic.net>; Cannabis <Cannabis@sonoma-county.org>; Chelsea Holup <Chelsea.Holup@sonoma-county.org>

> Subject: RE: Cannabis PC Meeting on 3/18

>

> Hi Sonia, I have copied one of our admins to assist on the recording request. It may not be done processing yet. Jerry Hittleman from Rincon worked with the cannabis program manager on the MND. It is standard practice for someone at Permit Sonoma to be the primary contact/signatory on an MND when a consultant prepares work on behalf of the county. I've copied the cannabis program who is the lead on the project for the purposes of your other questions.

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> To: Scott Orr <Scott.Orr@sonoma-county.org>

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> Thanks, again, for your response.

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> Sonia

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> Sonia Taylor

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From: [Brian Lamoreaux](#)
To: [Cannabis](#)
Subject: questions about commenting on county cannabis ordinances/rules
Date: Tuesday, March 23, 2021 9:12:13 PM

EXTERNAL

Hi,

I just learned that an industrial scale cannabis operation may show up on my rural street of Pepper Lane in Petaluma and I am terrified, totally shocked and am now losing sleep over this. This represents a dramatic impact to our rural neighborhood. High security fences, 24/7 security, an operator from out of the area (with likely little regard for local impacts), and high potential for serious crime, (yikes!) seem totally inappropriate for a residential neighborhood that is on the edge of farmland. If this were a mile into the farmland or within the bounds of a large ranch I would not feel this way, but it's just down from our mailboxes, where we walk everyday and will impact all of the kids who live here, including mine. We bought our home here 3 years ago feeling like we may never move but it's now causing us to have to rethink all of this.

I just cannot believe the County would consider impacting residential neighborhoods in this way. It seems crazy to me! Obviously there is big \$\$ at work here.

Where can I express my feelings, opinions etc, in a way that they may help shape the rules/ordinances of how this all plays out?
I would like to do so ASAP.

Thanks,

Brian Lamoreaux
415-269-3610
brian.lamoreaux@mac.com

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From: [Brian Lamoreaux](#)
To: [Cannabis](#)
Subject: Re: questions about commenting on county cannabis ordinances/rules
Date: Wednesday, March 24, 2021 10:09:53 AM

EXTERNAL

Hi,

I would like to learn more about the cannabis operation permit application (address: 985/987 Pepper Rd. Petaluma), where the buildings are proposed, lighting, fencing, security, what part is open to the public, etc. I'm very curious to see if a lighting study is needed, as I know to grow year round they need lighting. Also curious about the water plans, I've just learned we are in the 3rd driest year on record right now and pumping large amounts of water directly adjacent to residential aquifer is a big concern, going against many sustainability efforts put fourth by the county.

As far as policy goes I am disappointed to see that most operations rely on year round-growing, i.e. lighting. We need to be saving energy instead of going in the opposite direction. The wine industry is completely fine with the natural cycles of spring, summer, fall and winter and is economically sustainable based on this. Why do the economics of cannabis (which sound like they will make more in \$ than wine, after not that long) rely on artificial lighting? Any why do ordinances allow for industrial operations to be located directly adjacent to residential neighborhoods? It feels like an affront to our basic rights to safety, privacy, and quality of life. Why is policy encouraging or forcing cannabis operations to be so large in nature (multiple 12,000 sq ft buildings are huge!) rather than smaller, more boutique scenarios? It seems like right now is the opportunity to get the policy right and allow for incremental step ups in project sizes, if the smaller initial ones are successful. Going big right away will lead to many mistakes that will be bore onto neighborhoods and residents. Meanwhile cannabis industry and county coffers will grow plump without much care.

Thanks for your consideration,

Brian Lamoreaux
415-269-3610
brian.lamoreaux@mac.com

On Mar 24, 2021, at 8:20 AM, Cannabis <Cannabis@sonoma-county.org> wrote:

Hello Brian,

Thank you for your email.

Please review the related documents on this [webpage](#). You may send comments regarding the cannabis ordinance to this email address.

With regards to a specific project, you may send those comments to the project planner. If you send me the exact address of the proposed operation, I can look it up

and send you the planner's contact information.

McCall Miller

Sonoma County Cannabis Program
County Administrator's Office
Cannabis@sonoma-county.org

From: Brian Lamoreaux <brian.lamoreaux@me.com>

Sent: Tuesday, March 23, 2021 9:12 PM

To: Cannabis <Cannabis@sonoma-county.org>

Subject: questions about commenting on county cannabis ordinances/rules

EXTERNAL

Hi,

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I would like to do so ASAP.

Thanks,

Brian Lamoreaux
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brian.lamoreaux@mac.com

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From: [Carmen J. Borg](#)
To: [Cannabis](#); "[Harriet Buckwalter - FMWW](#)"; [Raymond Krauss](#)
Cc: [Robert Pittman](#); [Joseph D. Petta](#); [Aaron M. Stanton](#)
Subject: RE: Missing Exhibits
Date: Tuesday, March 23, 2021 10:07:43 AM

EXTERNAL

Hello Ms. Miller,

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Thank your for your attention to this matter. Please feel free to call me if there are any questions or issues with receipt of the FedEx package.



Carmen J. Borg
Urban Planner
Shute, Mihaly & Weinberger LLP
396 Hayes Street
San Francisco, CA 94102-4421
p: 415/552-7272 x259 | she/her
www.smwlaw.com | A San Francisco Green Business

From: Cannabis <Cannabis@sonoma-county.org>
Sent: Tuesday, March 23, 2021 8:57 AM
To: 'Harriet Buckwalter - FMWW' <h buck@sonic.net>
Cc: Carmen J. Borg <Borg@smwlaw.com>; Raymond Krauss <r krauss@sonic.net>
Subject: RE: Missing Exhibits

Good morning Harriet,

The exhibits are available via link in the cover email sent by Sara Breckenridge (see screenshot below). Anyone may click on the link to the shared drive in her email to view the exhibits.

Including the documents in that link on the County's website triggers Section 508 of the Rehabilitation Act of 1973 requiring government agencies to make electronic information accessible to people with disabilities.


Replace with

From: [Sara L. Breckenridge](#)
To: [Cannabis](#)
Cc: [Susan Brady](#); [David Rubin](#); [dimitris](#); [dimitris](#); [dimitris](#); [Andrew Smith](#); [Scott Day](#); [Tavis Wick](#); [Jennifer Klein](#); [Craig Carr](#); [Cameron MacIntosh](#); [Brenda Davis](#); [Larry Brady](#); [Eliza Bellows](#); [PlanningAgency](#); [Joseph D. Borg](#); [Aaron M. Stanton](#); [Carmen J. Borg](#)
Subject: Sonoma County Cannabis Land Use Ordinance Update and General Plan Amendment and Draft Subsequent Mitigated Negative Declaration
Date: Thursday, March 18, 2021 10:31:47 AM
Attachments: [FMWW Letter Re 2021 SMWD for Cannabis Land Use Ordinance Update and GBAPE](#)

EXTERNAL

Dear Commissioners:

Please find attached a letter from Joseph Petta, Aaron Stanton and Carmen Borg, on behalf of Friends of Mark West Watershed (FMWW), regarding the Sonoma County Cannabis Land Use Ordinance Update and General Plan Amendment. Due to large file size, the exhibits can be downloaded from the OneDrive link below. Please confirm your receipt of this letter and the exhibits. Thank you.
 Link to letter with exhibits: https://shute-mw-my.sharepoint.com/:b:/e/personal/breckenridge_smlaw.com/E25oTnlmMVFizyGiMdueCEBnQzr88775dZ8Yn75Xco8lw7eerccQeb



Sara L. Breckenridge
 Secretary to Carmen J. Borg
 Shute, Mihaly & Weinberger LLP
 396 Hayes Street
 San Francisco, CA 94102-6421
 p: 415/552-7272 x222 | www.smlaw.com | A San Francisco Green Business

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McCall Miller
 Sonoma County Cannabis Program
 County Administrator's Office
Cannabis@sonoma-county.org

-----Original Message-----
 From: Harriet Buckwalter - FMWW <hbuck@sonic.net>
 Sent: Friday, March 19, 2021 4:35 PM
 To: Cannabis <Cannabis@sonoma-county.org>
 Cc: Carmen Borg <Borg@smlaw.com>; Raymond Krauss <rkrauss@sonic.net>
 Subject: Missing Exhibits

EXTERNAL

Hello,

When I downloaded the last of the public comments that were submitted yesterday after 9:45AM and before the hearing began, I do see that you have the letter submitted on behalf of Friends of the Mark West Watershed, thank you. What I do not see are the exhibits that were submitted along with the letter. Can you please confirm that the exhibits will be available for public viewing as part of our submission?
 They are part of the public comments.

Thank you,
 Harriet

--
 Harriet Buckwalter

Co-Chair, Friends of the Mark West Watershed Upper Mark West Watershed Fire Safe Council
 6985 Saint Helena Road
 Santa Rosa, CA 95404
hbuck@sonic.net
 (707) 538-5307

markwestwatershed.org

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From: [Carmen J. Borg](#)
To: [Cannabis](#); "[Harriet Buckwalter - FMWW](#)"; [Raymond Krauss](#)
Cc: [Joseph D. Petta](#); [Aaron M. Stanton](#)
Subject: RE: Missing Exhibits
Date: Tuesday, March 23, 2021 4:55:14 PM

EXTERNAL

Thank you for your response. Can you please confirm that the County is including the exhibits submitted with both FMWW and SOSN's comments as part of the record?

Also, we tried delivering hard copies via overnight mail and we were told by our carrier that the package was refused. Do you have any idea why that would be the case?

Thank you,



Carmen J. Borg
Urban Planner
Shute, Mihaly & Weinberger LLP
396 Hayes Street
San Francisco, CA 94102-4421
p: 415/552-7272 x259 | she/her
www.smwlaw.com | A San Francisco Green Business

From: Cannabis <Cannabis@sonoma-county.org>
Sent: Tuesday, March 23, 2021 3:24 PM
To: Carmen J. Borg <Borg@smwlaw.com>; 'Harriet Buckwalter - FMWW' <hbuck@sonic.net>; Raymond Krauss <rkrauss@sonic.net>
Cc: Joseph D. Petta <petta@smwlaw.com>; Aaron M. Stanton <Stanton@smwlaw.com>
Subject: RE: Missing Exhibits

Hello Carmen,

We have updated [Addendum 4](#) to the Written Public Comments with the information below inserted as a page in front of the letters on behalf of Friends of Mark West Watershed and Save Our Sonoma Neighborhoods:

The attachments to the following letter are too voluminous to remediate as per Section 508 of the Rehabilitation Act of 1973 requiring government agencies to make electronic information accessible to people with disabilities. As such, the attachments are not available online, but are available to the public upon request. To receive a link to the attachments, email McCall Miller at Cannabis@sonoma-county.org.

Please let me know if you need anything further.

Thank you.

McCall Miller

Sonoma County Cannabis Program
County Administrator's Office
Cannabis@sonoma-county.org

From: Carmen J. Borg <Borg@smwlaw.com>
Sent: Tuesday, March 23, 2021 10:08 AM
To: Cannabis <Cannabis@sonoma-county.org>; 'Harriet Buckwalter - FMWW' <hbuck@sonic.net>; Raymond Krauss <rkrauss@sonic.net>
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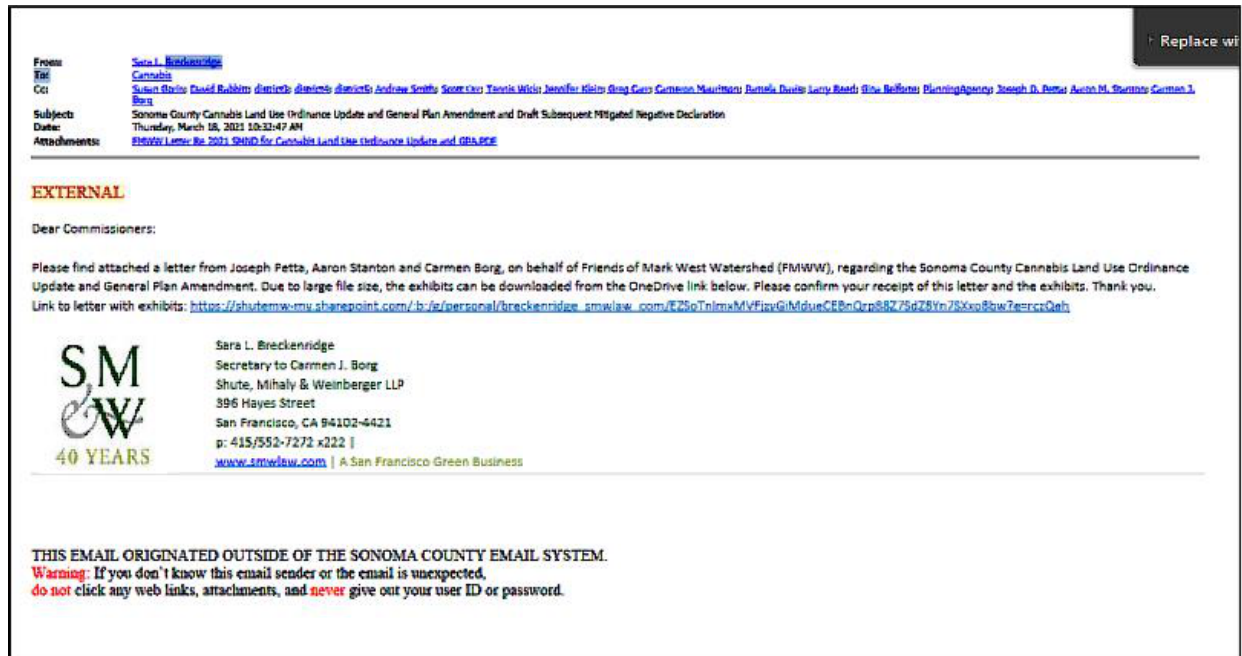
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Sonoma County Cannabis Program
County Administrator's Office
Cannabis@sonoma-county.org

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From: [Carmen J. Borg](#)
To: [Cannabis](#); "[Harriet Buckwalter - FMWW](#)"; [Raymond Krauss](#)
Cc: [Joseph D. Petta](#); [Aaron M. Stanton](#)
Subject: RE: Missing Exhibits
Date: Tuesday, March 23, 2021 6:33:23 PM

EXTERNAL

McCall,

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From: Cannabis <Cannabis@sonoma-county.org>
Sent: Tuesday, March 23, 2021 6:10 PM
To: Carmen J. Borg <Borg@smwlaw.com>; 'Harriet Buckwalter - FMWW' <huck@sonic.net>; Raymond Krauss <rkrauss@sonic.net>
Cc: Joseph D. Petta <petta@smwlaw.com>; Aaron M. Stanton <Stanton@smwlaw.com>
Subject: RE: Missing Exhibits

Carmen,

I have downloaded both sets of exhibits (369 pages for FMWW and 1489 pages for SOSN) and will provide the link upon request. Our offices are currently closed to the public. I have been told that FedEx packages are to be placed in the HR Drop Box (there is a sign saying to place packages for us there) and then the HR department will route them to us.

Links to the letters and exhibits:

- [Link to FMWW Exhibits](#)
- [Link to SOSN Exhibits](#)

McCall Miller

Sonoma County Cannabis Program
County Administrator's Office
Cannabis@sonoma-county.org

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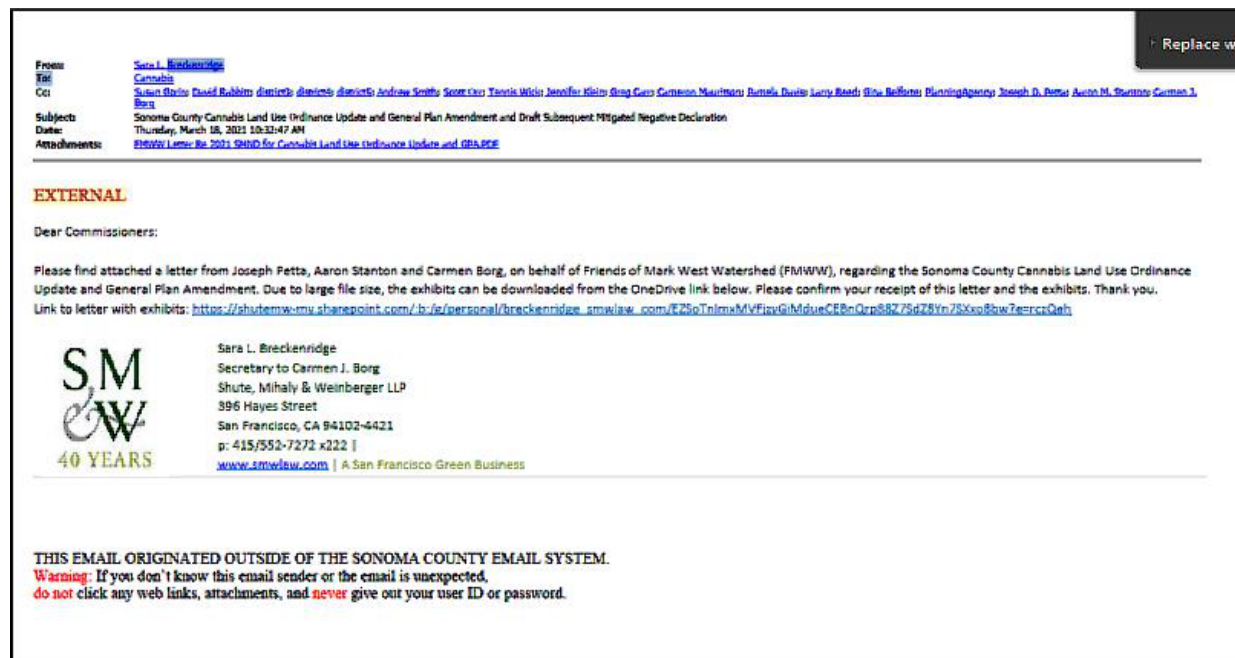
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Sent: Tuesday, March 23, 2021 8:57 AM
To: 'Harriet Buckwalter - FMWW' <hbuck@sonic.net>
Cc: Carmen J. Borg <Borg@smwlaw.com>; Raymond Krauss <rkrauss@sonic.net>
Subject: RE: Missing Exhibits

Good morning Harriet,

The exhibits are available via link in the cover email sent by Sara Breckenridge (see screenshot below). Anyone may click on the link to the shared drive in her email to view the exhibits.

Including the documents in that link on the County's website triggers Section 508 of the Rehabilitation Act of 1973 requiring government agencies to make electronic information accessible to people with disabilities.



McCall Miller

Sonoma County Cannabis Program
County Administrator's Office
Cannabis@sonoma-county.org

-----Original Message-----

From: Harriet Buckwalter - FMWW <hbuck@sonic.net>
Sent: Friday, March 19, 2021 4:35 PM
To: Cannabis <Cannabis@sonoma-county.org>
Cc: Carmen Borg <Borg@smwlaw.com>; Raymond Krauss <rkrauss@sonic.net>
Subject: Missing Exhibits

EXTERNAL

Hello,

When I downloaded the last of the public comments that were submitted yesterday after 9:45AM and before the hearing began, I do see that you have the letter submitted on behalf of Friends of the Mark West Watershed, thank you. What I do not see are the exhibits that were submitted along with the letter. Can you please confirm that the exhibits will be available for public viewing as part of our submission?

They are part of the public comments.

Thank you,
Harriet

--

Harriet Buckwalter

Co-Chair, Friends of the Mark West Watershed Upper Mark West Watershed Fire Safe Council
6985 Saint Helena Road
Santa Rosa, CA 95404
hbuck@sonic.net
(707) 538-5307
markwestwatershed.org

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From: [Marcie Woychik](#)
To: [Cannabis](#)
Subject: FW: Cannabis, Ag and Right to Farm
Date: Thursday, March 25, 2021 11:59:45 AM

Kind regards,

Marcie Woychik
Chief Deputy Clerk of the Board
County of Sonoma, Board of Supervisors



From: Susan Gorin
Sent: Wednesday, March 24, 2021 10:32 PM
To: Marcie Woychik <Marcie.Woychik@sonoma-county.org>
Subject: Fwd: Cannabis, Ag and Right to Farm

Susan Gorin

1st District Supervisor
County of Sonoma

*Be #SonomaSmart – Wash hands, wear masks, keep the distance.
It's all about community.*

575 Administration Drive, Room 100A
Santa Rosa, CA 95403
www.sonoma-county.org
susan.gorin@sonoma-county.org
Direct 707-565-2982
Cell 707-321-2788

[Redacted signature]

Begin forwarded message:

From: Deborah Eppstein <deppstein@gmail.com>
Date: March 23, 2021 at 7:48:04 AM PDT
To: Susan Gorin <Susan.Gorin@sonoma-county.org>
Subject: **Re: Cannabis, Ag and Right to Farm**

EXTERNAL

Understood- but why does it need to be long and controversial, when it would be just taking the identical language from the state ordinance to correct the language in our ordinance? Then the language in the realtor disclosure would follow. As it is now, we are misinforming realtors and home buyers with the incorrect disclosure, which is

wrong and I assume illegal.

Would it be simpler to just correct the realtor disclosure? (although it is included in the ordinance)

On Mar 23, 2021, at 6:06 AM, Susan Gorin <Susan.Gorin@sonoma-county.org> wrote:

Any "corrections" need to come through modifications to the entire ordinance. A very long, and perhaps controversial, process.

Susan Gorin

1st District Supervisor
County of Sonoma

*Be #SonomaSmart – Wash hands, wear masks, keep the distance.
It's all about community.*

575 Administration Drive, Room 100A
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Direct 707-565-2982
Cell 707-321-2788

[REDACTED]

On Mar 21, 2021, at 5:34 PM, Deborah Eppstein <deppstein@gmail.com> wrote:

EXTERNAL

Hi Susan- I brought this omission in our Right to Farm Ordinance to the attention of the Ag commissioner and the BOS on Sept 2, 2019. I do not understand why the county has not made these corrections in these important documents, both concerning the ordinance and the realtor disclosure. It is misleading to residents including farmers, and to realtors.

I look forward to hearing what follow up will be undertaken.

Thanks,
Debby

Begin forwarded message:

From: Deborah Eppstein <deppstein@gmail.com>
Subject: Cannabis, Ag and Right to Farm
Date: March 21, 2021 at 5:12:07 PM PDT
To: Jennifer.Klein@sonoma-county.org, Andrew Smith
<andrew.smith@sonoma-county.org>, Scott Orr <Scott.Orr@sonoma-county.org>

Dear Jennifer, Andrew, and Scott,

During the discussion at the Planning Commission meeting on the cannabis ordinance and proposed amendments to the general plan, it was asked what other counties had done

on the issue that cannabis is not classified as an ag product by the state. It was mentioned that Santa Barbara County may have designated cannabis as ag under Right to Farm laws. That is not the case.

As summarized below, Santa Barbara County even amended their Right to Farm ordinance to specifically exclude cannabis, citing differences from agriculture:

Santa Barbara County's Right Farm Ordinance states (emphasis added):

"Given the status of cannabis as a highly regulated controlled substance, which as of the date of the ordinance amendment adding this subsection is illegal under federal law, cannabis cultivation involves potential adverse effects that differ from the cultivation of other types of crops (e.g., criminal activity, and impacts on children and sensitive populations). State and county cannabis regulations include a number of development standards and permitting requirements to avoid or mitigate these adverse effects, which are not required for the cultivation of other types of crops on agricultural lands. Therefore, cannabis cultivation and cannabis operations are excluded from the protections of this section."

Their Right to Farm Ordinance also correctly follows state law in noting the 3-year period in which an ag operation can be declared a nuisance (emphasis added):

"No agricultural activity, operation or facility, or appurtenances thereof, conducted or maintained for commercial purposes, and in a manner consistent with proper and accepted customs and standards, as established and followed by similar agricultural operations in the same locality, shall be or become a nuisance, private or public, due to any changed condition in or about the locality, after the same has been in operation for more than three years if it was not a nuisance at the time it began."

I have previously brought the omission of the 3-year window in Sonoma County's Right to Farm Ordinance as well as the parallel error in the Realtor's
 ounsel and the Board of Supervisors in fall of 2019, but am not aware of any work done to correct this. Yes, it is subservient to state law and mentions that, but it should also be correctly written as this is misleading to county residents and realtors.

Does the county intend to correct its Right to Farm ordinance so that the wording aligns with state law?

Best regards,
Deborah Eppstein

https://library.municode.com/ca/santa_barbara_county/codes/code_of_ordinances?nodeId=CH3AG_ARTVRIFA

https://santamariatimes.com/news/local/santa-barbara-county-supervisors-make-cannabis-qualified-crop-for-agricultural-preserve-status/article_640d9a24-6557-5551-a209-1fb80c831a47.html

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From: [Erin Brooks](#)
To: [Cannabis](#); letters@sosneighborhoods.com
Subject: Ernest Vineyards Opposition to Cannabis
Date: Tuesday, March 23, 2021 10:09:19 AM
Attachments: [Ernest Vineyards Opposition to Cannabis.pdf](#)

EXTERNAL

March 23, 2021

Dear Sonoma County Supervisors:

The proposed ordinance covering cannabis cultivation in Sonoma county is premature and will have profound effects on the scenery and quality of life in Sonoma County.

1. According to the state of CA and the federal government, cannabis is a product not a crop. Sonoma County must continue to classify it as a product. Why is it a product? Because according to Proposition 64, which legalized it, as a smokable product, it cannot have any pesticide or insecticide residues. This, in turn means that it must be grown indoors (hoop houses). If Sonoma County classifies it as a crop, any pesticide drift from any neighboring source (dairies, vineyards, nurseries, private land owners etc) could make that neighbor liable, and that neighbor could lose whole crops, be fined and/or be sued by the cannabis grower. Fiddlesticks Vineyard in Santa Barbara County recently was fined because of pesticide drift and lost their entire chardonnay crop because they had to switch to a more expensive fungicide that proved to be ineffective. (see: <https://www.independent.com/wp-content/uploads/2020/06/Pesticide-drift-cases-in-SB-County-1990-2020.pdf>)
2. This ordinance has blind-sided the entire community. At a time when we are all concerned with economic conditions, COVID, wildfire prevention and recovery, this major change to our county has been sneaked out, hoping to gain approval before our communities have been fully appraised of its consideration by the county.
3. The County needs to focus on recovery and climate preparedness: We have suffered too much in the last four years.
4. What's the rush? Let's pause cannabis permitting and witness what happens in Santa Barbara County. Let's join with Napa and take a safe wait-and-see approach. If the cannabis opportunity truly is real and right for Sonoma County, it will still be real in 2-4 years. We can't afford to get this one wrong.
5. The cannabis industry should not be allowed to piggyback off of the reputation and brand we have carefully built. Our vineyards are firmly planted in the real soils of Sonoma County and grow in our beautiful blend of fog and sunshine. Indoor grows, most of which will be in potted soils heavily treated with fertilizers to promote maximum bud formation having nothing to do with the beautiful agricultural reality of Sonoma County and our incredible meat, dairy, vineyard, orchard and vegetable heritage. Given the cost of living in Sonoma County and the tax rates, there is only one reason for Cannabis to come to Sonoma County: to leverage the Sonoma brand for sales.
6. Water - Cannabis uses at least 6x the amount of water per harvest compared to grapes. Cannabis grows 2-3 harvests per year or 12x - 18x more water compared to grapes (Napa County 9111 report, dated 2020).
7. Plastic Hoop Houses: Plastic hoop houses are meant to extend the growing season. Not to protect a crop 365 days a year. Plastic hoop houses degrade Sonoma County's renowned scenic character. Can you imagine a cannabis bust and decaying hoop houses scattered across our county? Plastic

hoop houses are another reason that cannabis is a product not a crop.

8. The skunk like odor growing 300' from our tasting rooms will make wine tasting impossible 3-4 months a year (six weeks per crop x 2-3 crops = 3-4 months).

9. Agricultural labor is already in short supply.

10. Wrong product wrong place: Cannabis should be grown where there is abundant water, where it doesn't need to grow in plastic hoop houses, and where it can have large setbacks to mitigate odors.

11. Events: If cannabis becomes a crop then producers will be applying for rural events and attracting hundreds of people to grows around the county. If the county is already struggling with the definition and supervision of agricultural events, this will make the situation far worse and increase neighbor concerns dramatically.

A cannabis ordinance in Sonoma County is the wrong idea at exactly the wrong time for our community. We vigorously oppose any ordinance at this time.

Thank you,

Erin Brooks

Proprietor, Ernest Vineyards

Co-Founder, Grand Cru Custom Crush

1200 American Way

Windsor, CA 95492

Erin Brooks

Proprietor, Ernest Vineyards

415.305.2507 Mobile

erin@ernestvineyards.com

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Ernest Vineyards

March 23, 2001

Dear Sonoma County Supervisors:

The proposed ordinance covering cannabis cultivation in Sonoma county is premature and will have profound effects on the scenery and quality of life in Sonoma County.

1. According to the state of CA and the federal government, cannabis is a product not a crop. Sonoma County must continue to classify it as a product. Why is it a product? Because according to Proposition 64, which legalized it, as a smokable product, it cannot have any pesticide or insecticide residues. This, in turn means that it must be grown indoors (hoop houses). If Sonoma County classifies it as a crop, any pesticide drift from any neighboring source (dairies, vineyards, nurseries, private land owners etc) could make that neighbor liable, and that neighbor could lose whole crops, be fined and/or be sued by the cannabis grower. Fiddlesticks Vineyard in Santa Barbara County recently was fined because of pesticide drift and lost their entire chardonnay crop because they had to switch to a more expensive fungicide that proved to be ineffective. (see: <https://www.independent.com/wp-content/uploads/2020/06/Pesticide-drift-cases-in-SB-County-1990-2020.pdf>)
2. This ordinance has blind-sided the entire community. At a time when we are all concerned with economic conditions, COVID, wildfire prevention and recovery, this major change to our county has been sneaked out, hoping to gain approval before our communities have been fully appraised of its consideration by the county.
3. The County needs to focus on recovery and climate preparedness: We have suffered too much in the last four years.
4. What's the rush? Let's pause cannabis permitting and witness what happens in Santa Barbara County. Let's join with Napa and take a safe wait-and-see approach. If the cannabis opportunity truly is real and right for Sonoma County, it will still be real in 2-4 years. We can't afford to get this one wrong.
5. The cannabis industry should not be allowed to piggyback off of the reputation and brand we have carefully built. Our vineyards are firmly planted in the real soils of Sonoma County and grow in our beautiful blend of fog and sunshine. Indoor grows, most of which will be in potted soils heavily treated with fertilizers to promote maximum bud formation having nothing to do with the beautiful agricultural reality of Sonoma County and our incredible meat, dairy, vineyard, orchard and vegetable heritage. Given the cost of living in Sonoma County and the tax rates, there is only one reason for Cannabis to come to Sonoma County: to leverage the Sonoma brand for sales.

6. Water - Cannabis uses at least 6x the amount of water per harvest compared to grapes. Cannabis grows 2-3 harvests per year or 12x - 18x more water compared to grapes (Napa County 9111 report, dated 2020).
7. Plastic Hoop Houses: Plastic hoop houses are meant to extend the growing season. Not to protect a crop 365 days a year. Plastic hoop houses degrade Sonoma County's renowned scenic character. Can you imagine a cannabis bust and decaying hoop houses scattered across our county? Plastic hoop houses are another reason that cannabis is a product not a crop.
8. The skunk like odor growing 300' from our tasting rooms will make wine tasting impossible 3-4 months a year (six weeks per crop x 2-3 crops = 3-4 months).
9. Agricultural labor is already in short supply.
10. Wrong product wrong place: Cannabis should be grown where there is abundant water, where it doesn't need to grow in plastic hoop houses, and where it can have large setbacks to mitigate odors.
11. Events: If cannabis becomes a crop then producers will be applying for rural events and attracting hundreds of people to grows around the county. If the county is already struggling with the definition and supervision of agricultural events, this will make the situation far worse and increase neighbor concerns dramatically.

A cannabis ordinance in Sonoma County is the wrong idea at exactly the wrong time for our community. We vigorously oppose any ordinance at this time.

Thank you,

Erin Brooks

Erin Brooks
Proprietor, Ernest Vineyards
Co-Founder, Grand Cru Custom Crush
1200 American Way
Windsor, CA 95492

From: [Arielle Kubu-Jones](#)
To: [Cannabis](#)
Subject: FW: Sonoma Cannabis Ordinance/Regulation
Date: Tuesday, March 23, 2021 9:02:55 AM

From: Jasmine Hirsch <jasmine@hirschvineyards.com>
Sent: Tuesday, March 23, 2021 7:47 AM
To: Susan Gorin <Susan.Gorin@sonoma-county.org>
Cc: Arielle Kubu-Jones <Arielle.Kubu-Jones@sonoma-county.org>
Subject: Sonoma Cannabis Ordinance/Regulation

EXTERNAL

Dear Supervisor Gorin,

I am writing to you as the general manager and co-owner of a second-generation family farm and winery in Sonoma County.

The proposed ordinance covering cannabis cultivation in Sonoma county is premature and will have profound effects on the scenery and quality of life in Sonoma County.

1. **According to the state of CA and the federal government, cannabis is a product not a crop.** Sonoma County must continue to classify it as a product. Why is it a product? Because according to Proposition 64, which legalized it, as a smokable product, it cannot have any pesticide or insecticide residues. This, in turn means that it must be grown indoors (hoop houses). If Sonoma County classifies it as a crop, any pesticide drift from any neighboring source (dairies, vineyards, nurseries, private land owners etc) could make that neighbor liable, and that neighbor could lose whole crops, be fined and/or be sued by the cannabis grower. Fiddlesticks Vineyard in Santa Barbara County recently was fined because of pesticide drift and lost their entire chardonnay crop because they had to switch to a more expensive fungicide that proved to be ineffective. (see: <https://www.independent.com/wp-content/uploads/2020/06/Pesticide-drift-cases-in-SB-County-1990-2020.pdf>)
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A cannabis ordinance in Sonoma County is the wrong idea at exactly the wrong time for our community. We vigorously oppose any ordinance at this time.

Thank you,

Jasmine Hirsch

Jasmine Hirsch
Hirsch Vineyards
C. 646-912-5227
O. 707-847-3600

<http://www.hirschvineyards.com/>

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From: [Jasmine Hirsch](#)
To: [Cannabis](#)
Subject: Sonoma Cannabis Ordinance/Regulation
Date: Tuesday, March 23, 2021 2:19:14 PM

EXTERNAL

Dear Permit Sonoma,

I am writing to you as the general manager and co-owner of a second-generation family farm and winery in Sonoma County.

The proposed ordinance covering cannabis cultivation in Sonoma county is premature and will have profound effects on the scenery and quality of life in Sonoma County.

1. **According to the state of CA and the federal government, cannabis is a product not a crop.** Sonoma County must continue to classify it as a product. Why is it a product? Because according to Proposition 64, which legalized it, as a smokable product, it cannot have any pesticide or insecticide residues. This, in turn means that it must be grown indoors (hoop houses). If Sonoma County classifies it as a crop, any pesticide drift from any neighboring source (dairies, vineyards, nurseries, private land owners etc) could make that neighbor liable, and that neighbor could lose whole crops, be fined and/or be sued by the cannabis grower. Fiddlesticks Vineyard in Santa Barbara County recently was fined because of pesticide drift and lost their entire chardonnay crop because they had to switch to a more expensive fungicide that proved to be ineffective. (see: <https://www.independent.com/wp-content/uploads/2020/06/Pesticide-drift-cases-in-SB-County-1990-2020.pdf>)
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Thank you,

Jasmine Hirsch

Jasmine Hirsch
Hirsch Vineyards
C. 646-912-5227
O. 707-847-3600
<http://www.hirschvineyards.com/>

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From: [district5](#)
To: [Cannabis](#)
Cc: [Leo Chyi](#)
Subject: FW: Sonoma Cannabis Ordinance/Regulation
Date: Wednesday, March 24, 2021 9:44:21 AM

JW

From: Jasmine Hirsch <jasmine@hirschvineyards.com>
Sent: Tuesday, March 23, 2021 7:50 AM
To: Lynda Hopkins <Lynda.Hopkins@sonoma-county.org>
Cc: Leo Chyi <Leo.Chyi@sonoma-county.org>
Subject: Sonoma Cannabis Ordinance/Regulation

EXTERNAL

Dear Supervisor Hopkins,

I am writing to you as the general manager and co-owner of a second-generation family farm and winery in western Sonoma County, located in your district.

The proposed ordinance covering cannabis cultivation in Sonoma county is premature and will have profound effects on the scenery and quality of life in Sonoma County.

1. **According to the state of CA and the federal government, cannabis is a product not a crop.** Sonoma County must continue to classify it as a product. Why is it a product? Because according to Proposition 64, which legalized it, as a smokable product, it cannot have any pesticide or insecticide residues. This, in turn means that it must be grown indoors (hoop houses). If Sonoma County classifies it as a crop, any pesticide drift from any neighboring source (dairies, vineyards, nurseries, private land owners etc) could make that neighbor liable, and that neighbor could lose whole crops, be fined and/or be sued by the cannabis grower. Fiddlesticks Vineyard in Santa Barbara County recently was fined because of pesticide drift and lost their entire chardonnay crop because they had to switch to a more expensive fungicide that proved to be ineffective. (see: <https://www.independent.com/wp-content/uploads/2020/06/Pesticide-drift-cases-in-SB-County-1990-2020.pdf>)
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Thank you,

Jasmine Hirsch

Jasmine Hirsch
Hirsch Vineyards
C. 646-912-5227
O. 707-847-3600

<http://www.hirschvineyards.com/>

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From: [Andrew Smith](#)
To: [Scott Orr](#); [Christina Rivera](#); [McCall Miller](#); [Cannabis](#); [Sita Kuteira](#)
Subject: FW: Industrial Cannabis Cultivation
Date: Wednesday, March 24, 2021 11:51:51 AM
Attachments: [Approved Ad Hoc Recommendations 12-17-19.pdf](#)

From: Amber Morris
Sent: Wednesday, March 24, 2021 11:04 AM
To: Andrew Smith
Subject: Industrial Cannabis Cultivation

EXTERNAL

Good morning Andrew,

During the Planning Commission meeting last week Commissioner Davis expressed some interest in exploring whether industrial zoning expansion was outside of the scope of this current effort and you responded that the Board's direction applied to ag and resource zoning only.

I just watched the Dec 2019 meeting and was surprised to learn that the Board actually asked for that staff to consider improvements in the permitting process for all cultivation. Is there another document or meeting that I'm missing that specified ag and resource zoning only? I've attached the approved ad hoc recommendations for your reference.

Thanks,



AMBER MORRIS | Director of Government Affairs
916-606-0771 | amber.morris@norcalcann.com
[NorCal Cannabis Company](#)

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To: Board of Supervisors

Department or Agency Name(s): Board of Supervisors, Cannabis Ad Hoc (James Gore and Lynda Hopkins)

Staff Name and Phone Number: Niki Berrocal, Deputy County Administrator, 707-565-2431

Vote Requirement: Majority

Supervisorial District(s): All

Title:

Cannabis Ad Hoc Recommendations

Recommended Action:

- A) Receive update on the Cannabis Ad Hoc Committee and accept recommendations for program improvements.
- B) Approve the Cannabis Ad Hoc Committee's request for the Board of Supervisors to exercise original jurisdiction for the following use permit applications:
UPC17-0072 2815 Leslie Rd., Santa Rosa (MWWS), UPC17-0037 6101 Cleland Ranch Rd., Santa Rosa (MWWS), UPC18-0001 885 Montgomery Rd, Sebastopol, UPC17-0026 841 Leslie Rd, Healdsburg, UPC17-0085 4050 Grange Rd., Santa Rosa, UPC17-0012 2211 London Ranch Rd., Glen Ellen, UPC17-0048 12201 Highway 12, Glen Ellen, UPC17-0065 3803 Matanzas Creek Ln, Santa Rosa, UPC18-0015 2870 Leslie Rd./8373 Singing Hills, Santa Rosa, UPC17-0041 2000 Los Alamos Rd, Santa Rosa, UPC17-0095 3215 Middle Two Rock Rd, Petaluma, UPC18-0037 2260 Los Alamos Rd, Santa Rosa, UPC17-0069 1478 Valley Ford Freestone, Bodega, UPC17-0018 6095 Bodega Ave, Petaluma, PLP17-0040 351 Trinity Rd, Glen Ellen, UPC19-0002 101 Trinity Rd, Glen Ellen, UPC17-0032 520 Stage Gulch Rd, #A, Petaluma, UPC18-0022 2401 River Rd, Windsor, UPC17-0031 4222 Browns Ln, Petaluma

Executive Summary:

As cannabis became legal at the State level starting with the 2015 medical cannabis legislation, the County began its work to implement a locally legislated complimentary ordinance to bring non-regulated grows (estimated to be approximately between 6,000 – 7,000 at the time) into the regulated market where applicants were in compliance with the State requirements and local business and environmental guidelines.

The County adopted updates to the existing cannabis ordinance. The updates came with the cost of perpetual alignment to changing State regulations. The County conducted environmental review in the Board adopted a negative declaration with the December 2016 ordinance.

This item is an update from the Cannabis Ad Hoc to the full Board providing staff policy direction and requesting that the Board take original jurisdiction over certain use permit applications.

Discussion:

In December 2016, the Board of Supervisors adopted a series of ordinances establishing Phase I of the Sonoma County Cannabis Program to permit and regulate the cannabis industry. Recognizing a continued need for prioritization and leadership in this area, the Chair formed the current Cannabis Ad Hoc Committee on January 10, 2017. The primary purpose of the Ad Hoc is to ensure the successful implementation of the Sonoma County Cannabis Program that enables and incentivizes the industry to come into compliance while ensuring the interests of residents and the environment are protected. On April 10, 2018, the Board conducted a Cannabis Ordinance Study Session and adopted a Resolution of Intention to update the existing Cannabis Ordinances. The first phase of amendments to the Cannabis Land Use Ordinance was adopted on October 16, 2018. The Ad Hoc is ready to continue the next round of amendments.

Current Cannabis Program Status

As the County has continued to catch up to the State updates, confusion over definitions and the cannabis business community's ability to expand operations is stifling the industry in Sonoma County. This outcome is evident in the current cannabis sales tax collection for the unincorporated County with 10.6% less collection than the prior year and 34.2% less in cannabis business tax year over year. There are a few segments of the industry that are left behind currently due to the delay in the County's alignment with the State ordinance including delivery services and equity programs. The current ordinance as it stands doesn't support intended cultivation for mixed light, nor the current desire for dispensaries.

Some cannabis permit applications, the Penalty Relief Program, and the Cannabis Program in general have generated comments from some constituents. Staff responding to these requests estimate at least 20 hours weekly across departments for various Public Records Act requests, complaints, or inquiries.

The amount of time to process and make a final determination on a conditional use permit can be considerable. The department began accepting cannabis permit applications in July 2017 and many are still under review for a variety of reasons.

According to reports issued by the Community Advisory Group and a member survey conducted by the Sonoma Growers Alliance, the County has fallen short in bringing cannabis cultivators into the regulated market. This has raised or exacerbated issues related to safety, neighborhood compatibility, code enforcement, penalty relief, and appropriate fee, penalty, and tax structures.

Cannabis Ad Hoc Recommendations

The Ad Hoc recommends changes to staff approaches in the following areas: Penalty Relief, outdoor cultivation, original jurisdiction, code enforcement, and the timeline for these recommendations. These changes include an assessment of all remaining penalty relief applicants, process improvements to address the permit backlog, code enforcement shift, and updates to the ordinance toward ministerial permitting.

Penalty Relief:

The Ad Hoc recommends that the Cannabis Deputy County Administrator complete an assessment of each penalty relief applicant with the planner and other staff as appropriate to document status, path to hearing, outstanding issues and their resolution. The Ad Hoc additionally recommends that staff maintain flexibility related to when applicants in the penalty relief program are able to amend their project and remain in the program regarding disaster relief or increasing neighborhood compatibility.

Outdoor Cultivation and Program Improvements:

To better facilitate cannabis cultivation, the Ad Hoc recommends that staff investigate restructuring the Cannabis Program so that cannabis cultivation may be allowed with a ministerial permit issued by the Agricultural Commissioner, while associated building permits would continue to be issued by Permit Sonoma.

To implement best practices and address the permit backlog, the “Cannabis Team”, identified below will co-locate in a cannabis office that holds part-time, regular hours for all members of the public to access information, work on their permit applications, participate in trainings, and have access to dedicated planning staff.

- a. County Administrator (policy, legislation, department coordination, training, penalty relief, disaster relief, equity)
- b. Permit Sonoma (project review, comprehensive planning, code enforcement, fire permits)
- c. Agriculture Commissioner (zoning permits/ministerial, canopy verification, track and trace enforcement)
- d. Department of Health (environmental health)
- e. Auditor-Controller-Treasurer-Tax Collector (tax collection, disaster relief)
- f. County Counsel (land use, code enforcement)
- g. Transportation and Public Works (traffic, daily trips, impacts, mitigations)
- h. Parks (set back waivers, compatibility, and mitigations)

Dependent agencies include Sheriff, District Attorney, Economic Development Department, and PG&E. The Cannabis Team will design a program transition plan, managed by the County Administrator, for implementation once ordinance updates toward ministerial permitting are approved.

To keep momentum toward permitting, implement a 5-day response guideline for staff and applicants at each segment in the review process across all departments when feasible. Have assigned staff dedicate at least 50 - 75% (20 - 30 hours weekly) of their time toward implementation of the cannabis program. Positions could be time-limited but there is a need to assess core staff moving forward.

As the Ad Hoc is recommending that staff shift priorities from a countywide environmental impact review toward changes that do not require that level of environmental review, the Cannabis Ad Hoc recommends shifting the use for the appropriation made at FY 2019-20 budget hearings supporting a countywide environmental review in support of the recommended program improvements. Any one-time costs above current appropriations needed for these recommendations should be requested from the FY 2019-20 County Administrator cannabis environmental impact review allocation of \$750,000 as County Administrator requests with the consolidated budget adjustments for Board approval.

Original Jurisdiction:

In general, use permits are approved, conditionally approved, or denied by the Board of Zoning Adjustments. That decision is then subject to appeal to the Board of Supervisors. Alternatively, the Board of Supervisors may take original jurisdiction over any land use permit application pursuant to Sec. 26-92-155. Any member of Board of Supervisors may request that the Board take original jurisdiction, and the request need not state a reason for exercising original jurisdiction. To pass an action of original jurisdiction, a simple majority of the Board is needed. The Clerk of the Board has set aside special meeting dates on Mondays occurring throughout 2020 and 3 – 4 applicants from the list below will be scheduled for original jurisdiction per special meeting over this time. Other cannabis applications may be appealed and those appeals would be scheduled during these same special meeting dates also needing a simple Board majority. In accordance, the Ad Hoc requests that the Board exercise original jurisdiction over the following use permit applications:

UPC17-0072	2815 Leslie Rd., Santa Rosa (MWWS)
UPC17-0037	6101 Cleland Ranch Rd., Santa Rosa (MWWS)
UPC18-0001	885 Montgomery Rd, Sebastopol
UPC17-0026	841 Leslie Rd, Healdsburg
UPC17-0085	4050 Grange Rd., Santa Rosa
UPC17-0012	2211 London Ranch Rd., Glen Ellen
UPC17-0048	12201 Highway 12, Glen Ellen

UPC17-0065	3803 Matanzas Creek Ln, Santa Rosa
UPC18-0015	2870 Leslie Rd./8373 Singing Hills, Santa Rosa
UPC17-0041	2000 Los Alamos Rd, Santa Rosa
UPC17-0095	3215 Middle Two Rock Rd, Petaluma
UPC18-0037	2260 Los Alamos Rd, Santa Rosa
UPC17-0069	1478 Valley Ford Freestone, Bodega
UPC17-0018	6095 Bodega Ave, Petaluma
PLP17-0040	351 Trinity Rd, Glen Ellen
UPC19-0002	101 Trinity Rd, Glen Ellen
UPC17-0032	520 Stage Gulch Rd, #A, Petaluma
UPC17-0031	4222 Browns Ln, Petaluma
UPC18-0022	2401 River Rd, Windsor

Code Enforcement:

It is critical that code enforcement continue to educate cultivators as the County transitions into a regulated market. The Ad Hoc recommends that Permit Sonoma Code Enforcement will target the most egregious non-regulated grows while the Agriculture Commissioner handle those in the regulated market as the regulatory compliance arm of the State for licensed cultivators. Staff will include how and when code enforcement responsibilities will shift in the transition plan to be presented at a following Ad Hoc quarterly update.

Ordinance:

The Ad Hoc recommends that staff explore amending the Cannabis Land Use Ordinance to streamline cannabis cultivation permitting, including expanding opportunities for ministerial cannabis permits. While the Board had previously provided direction to proceed with an environmental impact report, the Ad Hoc now recommends directing staff to investigate ordinance and program amendments that may not require that level of environmental review. In order to address concerns regarding the dispensary cap and market opportunities the Ad Hoc recommends that staff continue to explore updates to the dispensary ordinance.

Timeline:

The goal with penalty relief is to complete assessments by the end of March 2020, with hearings scheduled and date determined by June 30th, 2020.

To transition outdoor permitting to ministerial and shift to the Agriculture Commissioner, upon approval of this item staff will explore streamlining the issuance of cultivation permits including expanding opportunities for ministerial permits. The Ad Hoc will present the program transition plan at a following quarterly update.

The Cannabis Deputy County Administrator will work with the Clerk of the Board to schedule hearings for the use permit applications listed in this item for which the Board approves exercising original jurisdiction.

The timeline to transition the regulated market code enforcement to the Agricultural Commissioner and refocus Permit Sonoma to the non-regulated market and will follow the staff transition plan presented at a following quarterly update.

This report and recommended actions meet the charter of the Cannabis Ad Hoc to review the cannabis program and implement improvements. Additionally, to increase multi-jurisdiction coordination and enhance best practices, the Cannabis Ad Hoc and staff will actively participate in the Northern and Central County Cannabis Consortiums.

Prior Board Actions:

December 13, 2016: Final adoption of Cannabis Business Tax Ordinance and Cannabis Health Ordinance

December 20, 2016: Final adoption of Cannabis Land Use Ordinance

January 10, 2017: Cannabis Ad Hoc Committee formed

April 11, 2017: Approval of staffing and budgetary adjustments to implement the Cannabis Program, adoption of the 2017 Cannabis Ad Hoc Committee Charter, and approval of the Advisory Group Selection and Work Plan

July 18, 2017: Approval of the appointment of 20 members to serve on the Sonoma County Cannabis Advisory Group for a term of two years

September 12, 2017: Approval of a Resolution to modify and extend the Temporary Code Enforcement Penalty Relief Program for Land Use Permits for Cannabis Operations

April 10, 2018: Resolution of Intention to Update Existing Cannabis Ordinances

August 28, 2018: Final adoption of the Cannabis Business Tax and Health Ordinance amendments

October 16, 2018: Final adoption of Phase 1 of the updates to the Cannabis Land Use Ordinance

FISCAL SUMMARY

Expenditures	FY 19-20 Adopted	FY20-21 Projected	FY 21-22 Projected
Budgeted Expenses	\$750,000		
Additional Appropriation Requested			
Total Expenditures	\$750,000		
Funding Sources			
General Fund/WA GF			
State/Federal			
Fees/Other			
Use of Cannabis Fund Balance	\$750,000		
Contingencies			
Total Sources	\$750,000		

Narrative Explanation of Fiscal Impacts:

There are no costs associated with this item at this time. Staff will return to the Board with one-time requests as needed to implement program improvements. It is anticipated that the \$750,000 already set aside will be sufficient to cover the one-time requests associated to implement the program improvements.

Staffing Impacts:			
Position Title (Payroll Classification)	Monthly Salary Range (A-I Step)	Additions (Number)	Deletions (Number)

Narrative Explanation of Staffing Impacts (If Required):

Click or tap here to enter text.

Attachments:

Attachment A – PowerPoint

Related Items “On File” with the Clerk of the Board:

None

From: [Arielle Kubu-Jones](#)
To: [Cannabis](#)
Subject: FW: Cannabis ordinance
Date: Wednesday, March 24, 2021 8:50:51 AM

From: Ted Lemon <ted@littorai.com>
Sent: Wednesday, March 24, 2021 8:28 AM
To: letters@sosneighborhoods.com; Susan Gorin <Susan.Gorin@sonoma-county.org>; David Rabbitt <David.Rabbitt@sonoma-county.org>; Chris Coursey <Chris.Coursey@sonoma-county.org>; Lynda Hopkins <Lynda.Hopkins@sonoma-county.org>; district4 <district4@sonoma-county.org>
Cc: Arielle Kubu-Jones <Arielle.Kubu-Jones@sonoma-county.org>; Andrea Krout <Andrea.Krout@sonoma-county.org>; Jenny Chamberlain <jchamber@sonoma-county.org>; Leo Chyi <Leo.Chyi@sonoma-county.org>
Subject: Cannabis ordinance

EXTERNAL

Dear Sonoma County Supervisors:

The proposed ordinance covering cannabis cultivation in Sonoma county is premature and will have profound effects on the scenery and quality of life in Sonoma County.

1. **According to the state of CA and the federal government, cannabis is a product not a crop.** Sonoma County must continue to classify it as a product. Why is it a product? Because according to Proposition 64, which legalized it, as a smokable product, it cannot have any pesticide or insecticide residues. This, in turn means that it must be grown indoors (hoop houses). If Sonoma County classifies it as a crop, any pesticide drift from any neighboring source (dairies, vineyards, nurseries, private land owners etc) could make that neighbor liable, and that neighbor could lose whole crops, be fined and/or be sued by the cannabis grower. Fiddlesticks Vineyard in Santa Barbara County recently was fined because of pesticide drift and lost their entire chardonnay crop because they had to switch to a more expensive fungicide that proved to be ineffective. (see: <https://www.independent.com/wp-content/uploads/2020/06/Pesticide-drift-cases-in-SB-County-1990-2020.pdf>)
2. **This ordinance has blind-sided the entire community.** At a time when we are all concerned with economic conditions, COVID, wildfire prevention and recovery, this major change to our county has been sneaked out, hoping to gain approval before our communities have been fully appraised of its consideration by the county.
3. **The County needs to focus on recovery and climate preparedness:** We have suffered too much in the last four years.
4. **What's the rush?** Let's pause cannabis permitting and witness what happens in

Santa Barbara County. Let's join with Napa and take a safe wait-and-see approach. If the cannabis opportunity truly is real and right for Sonoma County, it will still be real in 2-4 years. We can't afford to get this one wrong.

5. **The cannabis industry should not be allowed to piggyback off of the reputation and brand we have carefully built.** Our vineyards are firmly planted in the real soils of Sonoma County and grow in our beautiful blend of fog and sunshine. Indoor grows, most of which will be in potted soils heavily treated with fertilizers to promote maximum bud formation having nothing to do with the beautiful agricultural reality of Sonoma County and our incredible meat, dairy, vineyard, orchard and vegetable heritage. Given the cost of living in Sonoma County and the tax rates, there is only one reason for Cannabis to come to Sonoma County: to leverage the Sonoma brand for sales.
6. **Water** - Cannabis uses at least 6x the amount of water per harvest compared to grapes. Cannabis grows 2-3 harvests per year or 12x - 18x more water compared to grapes (Napa County 9111 report, dated 2020).
7. Plastic Hoop Houses: Plastic hoop houses are meant to extend the growing season. Not to protect a crop 365 days a year. Plastic hoop houses degrade Sonoma County's renowned scenic character. Can you imagine a cannabis bust and decaying hoop houses scattered across our county? Plastic hoop houses are another reason that cannabis is a product not a crop.
8. **The skunk like odor** growing 300' from our tasting rooms will make wine tasting impossible 3-4 months a year (six weeks per crop x 2-3 crops = 3-4 months).
9. **Agricultural labor is already in short supply.**
10. **Wrong product wrong place:** Cannabis should be grown where there is abundant water, where it doesn't need to grow in plastic hoop houses, and where it can have large setbacks to mitigate odors.
11. **Events:** If cannabis becomes a crop then producers will be applying for rural events and attracting hundreds of people to grows around the county. If the county is already struggling with the definition and supervision of agricultural events, this will make the situation far worse and increase neighbor concerns dramatically.

A cannabis ordinance in Sonoma County is the wrong idea at exactly the wrong time for our community. We vigorously oppose any ordinance at this time.

Thank you,

Ted Lemon
Proprietor
Littorai Wines

788 Gold Ridge Rd
Sebastopol, CA 95472
P: 707-823-9586
F: 707-823-9589
www.littorai.com

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From: [Jay Wallace](#)
To: [Cannabis](#)
Subject: when is the next public hearing or Board of Supes meeting on new cannabis ordinance?
Date: Thursday, March 25, 2021 7:29:47 PM

EXTERNAL

Can you kindly let me know when the next public hearing is (Planning Commission or Board of Supervisors) on the County's new proposed cannabis ordinance. Thank you, Jay

Jay Wallace
415-601-2081
jwallace@jaywallaceassociates.com

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From: [Sue Christiansen](#)
To: [Cannabis](#)
Subject: NO
Date: Thursday, March 25, 2021 9:48:53 AM

EXTERNAL

I do not favor cannabis farming in Sonoma County. I also do not favor it being under the auspicious of the Ag Dept. There are too many negatives for neighbors. Let's stick to vineyards! We are Wine Country!
Sue Christiansen

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From: [Jay Wallace](#)
To: [Cannabis](#)
Subject: Thank you for the prompt reply
Date: Friday, March 26, 2021 11:24:52 AM

EXTERNAL

Thank you!

Jay Wallace
415-601-2081
jwallace@jaywallaceassociates.com

On Mar 26, 2021, at 10:46 AM, Cannabis <Cannabis@sonoma-county.org> wrote:

Good morning Jay,
The Planning Commission continued meeting will be on April 15, 2021 at 6:00 PM.

McCall Miller

Sonoma County Cannabis Program
County Administrator's Office
Cannabis@sonoma-county.org

From: Jay Wallace <jwallace@jaywallaceassociates.com>
Sent: Thursday, March 25, 2021 7:30 PM
To: Cannabis <Cannabis@sonoma-county.org>
Subject: when is the next public hearing or Board of Supes meeting on new cannabis ordinance?

EXTERNAL

Can you kindly let me know when the next public hearing is (Planning Commission or Board of Supervisors) on the County's new proposed cannabis ordinance. Thank you, Jay

Jay Wallace
415-601-2081

jwallace@jaywallaceassociates.com

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From: [Anna Williams](#)
To: [Cannabis](#)
Subject: Cannabis Ordinance Process
Date: Saturday, March 27, 2021 10:09:26 AM

EXTERNAL

Dear Board of Supervisors,

I am writing to voice my concerns around the new cannabis regulations being considered in our county. I live on Harville Rd, off of Calistoga Rd. As a resident of this county for over 30 years, having endured fires and loss of home, I have come to respect the permit process that exists in relationship to building a home here in our county. I have put my trust in this process believing that the regulations created are ultimately to my benefit and to my community's benefit. Therefore, when I read updates from the Friends of the Mark West Watershed that reveal that the Cannabis Ordinance currently does not require an Environmental Impact Report, I am very concerned. The County should complete a full EIR so the impacts can be studied and commented on in detail. An EIR provides a rational framework for public discussion, one issue at a time, with nothing left out. This process ensures that the environmental impact is clear and allows our community to make decisions that are in the best interest of our fragile ecosystem. Please make sure that this process is included so that residents can be assured that any permits given have been fully reviewed and approved.

Respectfully,

Anna Williams



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From: [Chelsea Holup](#) on behalf of [PlanningAgency](#)
To: [Cannabis](#)
Subject: FW: Cannabis Ordinance March 25, 2021
Date: Tuesday, March 30, 2021 11:05:30 AM

From: Gail <gailfreder@att.net>
Sent: March 25, 2021 9:48 AM
To: PlanningAgency <PlanningAgency@sonoma-county.org>
Subject: Cannabis Ordinance March 25, 2021

EXTERNAL

Two concerns about expanding cannabis farming in our county:

1. Expanding agricultural land for cannabis will further reduce land available & affordable for food crops and livestock. Since cannabis is a high value crop those farmers can pay more for land; as aging farmers retire, new, younger traditional farmers will not be able to afford land.

It is important that protect our food farmers, even if it means less tax revenue for the County. **If this ordinance passes, I hope the County or State will subsidize small food farmers to keep food farmers local.**

2. The “solid fencing and screening” that cannabis farms are required to have to their crops has resulted in 8 foot tall screened mesh fencing -like you see in construction sites - covering large areas in the countryside. These fences are visible even with the setback requirement; where we had beautiful vistas from our homes we now see a expansive, unsightly screened fencing.

Is this type of fencing in line with the general plan? Is this what you want to see all over our beautiful Sonoma County? **Please require more aesthetic fences, like deer fence or just t-posts and barbed wire and ban "screened mesh" construction type fences.**

Thank you for your consideration.
Gail Frederickson

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From: [Ken Freeman](#)
To: [Susan Gorin](#); [David Rabbitt](#); [Chris Coursey](#); [Lynda Hopkins](#); Disrict4@sonoma-county.org
Cc: [Cannabis](#); [Andrew Smith](#); [Tennis Wick](#); [Sita Kuteira](#); jennifer.klein@sonoma-county.orr; [Sheryl Bratton](#); [Arielle Kubu-Jones](#); [Andrea Krout](#); [Jenny Chamberlain](#); [Leo Chyi](#)
Subject: Business Owner: Cannabis - We need a CEQA Study
Date: Wednesday, March 31, 2021 1:22:27 PM

EXTERNAL

Dear Sonoma County Supervisors,

As a successful winery and vineyard owner in Sebastopol and Occidental I wanted to share my thoughts on why it's essential that we slow down and study the pro's and cons of Cannabis growing in Sonoma County; my wife, Akiko who is also our winemaker and I have spent 20 years traveling the US, and the World raising the profile for Sonoma Wines and Tourism. We sell around 20% of our 6,000 cases of organically grown wine in Asia, (mostly Japan.) If Sonoma County becomes Pot-land, like Santa Barbara these high-end Asian tourists and buyers will not visit Sonoma County.

I am actually pro cannabis, but these grows should be in warehouse's along 101, the DairyLand's near Two Rock, or at a minimum on 20 acres with 1000 foot setbacks from their neighbors. We have friends across the county that have grows next to them and it has dramatically reduced their quality of life. Also, in most instances every neighbor nearby does not want these grows in their neighborhoods, and not one is in support, (On Montgomery Road, Sebastopol I counted 32 letters of opposition and not one letter of support) – where is the democracy?

What is the rush? We don't need Cannabis growing in Sonoma as our economy is strong and our brand for high end tourism is growing. The Pot growers have better places to grow with more water, and less expensive land and procedures. They want to leach / leverage the Sonoma brand which they have had no role in growing, but will only hurt our reputation in the long run.

I hope that you will slow down this approval process and request a CEQA study, which should have been done four years ago when the issue first came up.

Thank you for your time, and for your service to our county,

Ken Freeman
Mobile: 415 310-5077
Winery: 707 823-6937
www: freemanwinery.com

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From: [Lisa Lai](#)
To: [Susan Gorin](#)
Cc: [BOS](#); [Cannabis](#)
Subject: Your FB post for Pat and Ch 38
Date: Wednesday, March 31, 2021 9:14:54 AM

EXTERNAL

Hi Ms. Gorin,

I was just reading your lovey Facebook post, sending off Pat. I saw you looked back on all the PG&E shutdowns. We have had SO many over the years!

I wanted to remind you that under Chapter 38, cannabis growers would only be able to use generators during DECLARED emergencies. So the PSPS shutdowns would not count, as they are to avoid disasters. This creates a situation where fresh frozen products could spoil, indoor growers would not be able to keep their plants on the right cycle, and vegetative plants in the propagation area or nurseries would go to flower and have to be destroyed. Wells also don't work without power.

This one word change to the ordinance has the potential to cause a large negative impact to the industry. Please strike it from the draft.

Has generator use really been such a problem? We are already not allowed to use generators unless it is an emergency. Some emergencies happen that are not declared, yet still emergencies at a specific farm. We are professionals that must be allowed to use our best judgment to protect our crops and harvests.

Additionally, the PC used this "declared emergency" clause for trucking water under the lense of a declared drought only. What if our ponds were drained to fight a fire? What if our power was down and our wells wouldn't work? There are many reasons besides droughts to truck water. It should not be ONLY allowed during a declared emergency, and it shouldn't used as a reason to exclude water zones three and four.

The biological assessment is a report that must be conducted for every ministerial zoning permit. So using the hydrology report as a reason to kick out water zones three and four is based on a poor premise.

Removing zones three and four virtually kills the ordinance. Zone one is within city limits or tiger salamander habit. Zone 2 is the sweet spot. Unless you agree with the 400' property line setbacks next to residential. Then zone 2 is very limited. Zones three and four make up 75% if the county. Many of the areas have a lot of water, which can be supported by a hydrology report. Several don't even use groundwater, as they have access to recycled, surface, or catchment water supplies. Sounds three and four are often further away from homes, and therefore decrease neighborhood compatibility issues.

Please work to get this ordinance where it needs to be to meet the goals you set forth for staff in drafting it.

Sincerely,

Lisa Lai
All Cali Farm

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From: [Alexa Wall](#)
To: [district4](#); [Susan Gorin](#); [Tennis Wick](#); [David Rabbitt](#); [Lynda Hopkins](#); [Andrew Smith](#); [McCall Miller](#); [Scott Orr](#); [Sita Kuteira](#)
Subject: Planning Commission Meeting Follow Up Thoughts
Date: Thursday, April 1, 2021 5:25:11 PM

EXTERNAL

Dear County Staff & Officials,

I am writing to provide my thoughts on the recent Planning Commission meeting and the proposed new ordinance under Chapter 38. I was frustrated by many things that I heard at the previous meeting so I'd like to address these matters.

For one, the more I look into Chapter 38, the more it feels like a facade and not a true solution to the problems that cannabis operators face which is the slow & needlessly expensive CUP permitting process. This new ordinance will work, but only for a few lucky properties that fit the bill and if the Board passes Ch 38 with the additional restrictions proposed by the Planning Commission on March 25th, then the process will work for no one besides big money operators that can afford large parcels in zone water 1 or 2 with no neighbors nearby. I thought the goal of this program was to support the existing Legacy Farmers and encourage their participation in the legal market but currently that is not what is happening. Here are my issues:

- There's nothing in Ch 26 or Ch 38 that protects Legacy Farmers (those in the pipeline or already permitted that were operating in SoCo prior to 2017). The few of us left in this process have spent tens of thousands, or hundreds of thousands of dollars+, to meet the ordinance rules at the time that we applied and **we should be protected and allowed to keep operating without fear that our permits won't be able to be renewed due to a newly added restriction.**
- Folks who have gone through, or go through, the CUP process should get a permit that runs with the land instead of 5 years. Because of the strenuous process and requirements for a CUP, we should be allowed to continue operating past the 5-year life of our CUP so long as the operator stays in good standing with the county and maintains state licensing. Supervisors, please **tell your Commissioners to recommend removing the term limits on CUPs and find a way to grandfather in the very few Legacy Farmers left** in this process.
- If these newly proposed restrictions (increased residential setbacks, restricted water zones, etc) pass for Ch 38, then pretty much none of the Ch 26 farmers would be able to meet these new standards and expand. The county would be hindering the growth of farmers that are already operating. If folks are able to grow a larger amount under a Zoning Permit, then **we should also be able to expand our operations under a Chapter 26 CUP.*****

***Here is my situation as an example: I am currently permitted for 10,000sf of outdoor, 10,000sf of greenhouse, and 5,000sf of indoor under my Chapter 26 CUP. I would love to be able to expand my greenhouse operations from 10,000sf to 20,000sf. However, I currently have a few small mitigation measures for my project, such as a nesting bird survey requirement. So because I have this bio mitigation, I would never be eligible for the new Zoning Permit under Chapter 38 and therefore I would not be able to apply for expansion. Why are larger canopy allowances given to Zoning Permits but not allowed for CUP operators who went through a rigorous process? Therefore I believe that operators should be allowed to expand not only under Ch 38 but also under Ch 26.

- The Ch 26 permitting process is taking WAY TOO LONG and there's not enough oversight of the outsourced planners. Applicants are getting taken advantage of and paying way too much for not enough support. **The County should have a dedicated team of planners and/or a Cannabis Program Manager** that can hold outsourced planners accountable and make sure they are doing their job correctly and timely.
- Neighborhood groups are spreading incorrect assumptions about our industry and using scare tactics to get folks to believe things that are false and therefore submitting public input based on lies. For example, no one in the cannabis industry wants to see 65,000+ acres of cannabis grown here- yet this is the first thing listed on the Neighborhood Coalition website. The County should know by now the truths of how regulated our industry is and how very little of cannabis has been applied for so far. We just want a fair shot to participate in society as legitimate tax-paying businesses so please **don't create policy based on NIMBYs.**

Supervisors, please talk with your Planning Commissioners prior to the April 15th meeting... **We don't need increased setbacks. We don't need increased parcel size requirements. We don't need onerous odor standards when the same plant (hemp) can be grown practically anywhere in the county. We don't need CUP term limits. We need acceptance and a pathway to thrive as a legitimate agriculture industry that was voted on and legalized by the people of the State of California.**

Protect your small craft, Legacy Farmers! PLEASE!

Thanks,
Alexa

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From: [district2](#)
To: [Cannabis](#)
Subject: FW: Cannabis growers
Date: Monday, April 5, 2021 9:25:41 AM

Tina Thomas

Board of Supervisors Aide, Second District David Rabbitt
County of Sonoma
Email: tina.thomas@sonoma-county.org
Phone: (707) 565-2241

From: Nancy Hair <doghairnancy@yahoo.com>
Sent: Thursday, April 1, 2021 9:32 AM
To: district5 <district5@sonoma-county.org>; district4 <district4@sonoma-county.org>; district3 <district3@sonoma-county.org>; district2 <district2@sonoma-county.org>; district1@sonoma-county.org
Subject: Cannabis growers

EXTERNAL

Hard to put this nicely. Allowing weed to be grown on a large scale all over the county with no meaningful setbacks is another slap in the face of property owners who value the little remaining natural beauty, integrity, and security in the county. We are angrier than ever about the abuse of the 'right to farm' boondoggle when it extends to drugs and alcohol. It's outrageous that 'crops' that have no nutritional value and are really all about 'recreation' and increased 'tourism' are allowed to swarm all over the county without meaningful limitations. The BOS has done a horrible job of explaining why it's selling voters out once again. Is it because of the big contributions from Big Weed? Or because of the lawsuits they are threatening? Or expected revenues to cover the pension/homeless/train disasters?

Conservation minded people are sick over the serious problems that Big Wine and Big Weed have been allowed to get away with. When is enough enough?

Nancy Hair
Sebastopol

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From: [Edy Bishop](#)
To: [Cannabis](#)
Subject: Request public comments to cannabis ordinance
Date: Sunday, April 4, 2021 10:59:36 AM

EXTERNAL

I would like to request public comments to be emailed to me re. The cannabis ordinance changes. My email is edybishop@hotmail.com. Thank you.

Sent from my Verizon, Samsung Galaxy smartphone

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From: [Scott Orr](#)
To: [Cannabis](#)
Subject: FW: Factual information
Date: Monday, April 5, 2021 8:07:23 AM

From: Deborah Eppstein <deppstein@gmail.com>
Sent: Monday, April 5, 2021 8:07 AM
To: Scott Orr <Scott.Orr@sonoma-county.org>; Jennifer Klein <Jennifer.Klein@sonoma-county.org>; Andrew Smith <Andrew.Smith@sonoma-county.org>
Cc: Tennis Wick <Tennis.Wick@sonoma-county.org>
Subject: Re: Factual information

EXTERNAL

Good morning, hope you all had a nice weekend.

As noted in my email from Marg 19, It was not clear from the discussion at the PC meetings what permits were required for hoop houses. Andrew Smith initially stated that they only needed a fire operational permit. Then it was stated that if they had electrical they would need a permit from PRMD, but then Mr Smith indicated that this was only for greenhouses. It was also mentioned that if a hoop house with electrical had a permit from PRMD, it could remain up year round.

Can you please clarify what the permit situation is on hoop houses? Concerning the 180 days they are allowed to remain up, does everything need to be taken down on the remaining 185 days, including the hoop structure piping itself, and all the electrical, plumbing and mechanical associated with it?

Thank you for clarifying this!

Best regards,
Deborah Eppstein

On Mar 19, 2021, at 4:00 PM, Deborah Eppstein <deppstein@gmail.com> wrote:

Dear All,

I attended the Planning Commission meeting discussing the proposed new cannabis ordinance chapter 38, the SMND and proposed changes to chapter 26. I was appalled that staff did not know what was in their documents, including the proposed chapter 38 and modifications to chapter 26. A few examples include

1) not knowing that the 10% of parcel limitation was specified only for outdoor and hoop houses (38.12.030), whereas indoor cultivation in

existing permanent structures was unlimited, and the limit on new structures was again additive.

2) Not knowing what the definition of hoop houses was, or what permits would be required for the electrical, plumbing and mechanical that would now be allowed. Mr. Smith first stated only a fire operational permit but no building permits, yet then also stated a building permit would be required, then said that was only for a greenhouse. Which is it?

3) Not understanding the big differences between the amended chapter 26, effective March 11, and the prior chapter 26 where the staff comments were shown. Are you aware that the definition of hoop houses was eliminated in the amended chapter 26? Thus the current cannabis ordinance now has no definition of hoop houses. Or was the intent that the new definition in chapter 38, allowing electrical, plumbing, mechanical, and where light deprivation is no longer prohibited now apply to chapter 26 even before chapter 38 is adopted? This would be a major change to the current cannabis ordinance.

I and others have pointed out numerous other errors and inconsistencies in chapter 38 and the SMND- eg how setbacks are measured, **missing mitigation measures**, what criteria apply to manufacture of cannabis product (extracted THC oil and edibles) under the allowed activities of a ministerial permit (38.14.020) and was it intended that this can indeed be done on site with no use permit, no longer required to be in an industrial zone as in chapter 26, **and many more**.

I sincerely hope that prior to the next hearing on March 25, staff will carefully read chapter 38 and the SMND so that the Planning Commissioners questions can be correctly answered. The public is very well informed on these matters; it seems very wrong that when we hear staff make misstatements, we cannot provide a correction.

Thank you for your attention to this critical matter.

With best regards,
Deborah A Eppstein, PhD
Sonoma County
801-556-5004

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From: [Arielle Kubu-Jones](#)
To: [Marcie Woychik](#)
Subject: FW: Concerns About Cannabis Expansion in Sonoma County
Date: Monday, April 5, 2021 3:56:01 PM

FYI

From: John Donnelly
Sent: Monday, April 5, 2021 10:28 AM
To: Susan Gorin ; Linda.Hopkins@sonoma-county.org; David Rabbitt ; James.Gore@sonoma-county.org; Chris Coursey
Cc: John Donnelly
Subject: Concerns About Cannabis Expansion in Sonoma County

EXTERNAL

Dear Sonoma County Supervisors:

We join with Sally and Ron Grassi in sharing our concerns regarding the BOS's plans to ease restrictions for the cultivation of cannabis.

There are at least three important concerns that must be addressed.

(1) The **odor** is absolutely unpleasant and it is impossible to contain. Sonoma residents should not have to deal with this skunk-like odor.

(2) The **water** that is needed to grow this crop is off the charts compared to other crops. We need to take into account that our climate is changing, and so is our water supply. With all the new development in Sonoma County and the further demand for water associated with the growth of cannabis, there isn't an adequate water supply available. The accelerating climate crisis will intensify the **severe droughts** here in Sonoma County greatly impacting the availability of water.

(3) It is difficult to understand any decision to approve cannabis projects except that they're offering to buy their way into our County.

Please do not let this industry change the character of Sonoma County. Do not change our land use rules, and *do* elevate environmental impact requirements for cannabis proposals (especially water and odor impacts).

There are more appropriate areas in the State where cannabis could be grown without such conflicts and externalities.

John & Sara Donnelly
578 7th St W, Sonoma CA 95476

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From: [Susan Gorin](#)
To: [Marcie Woychik](#)
Subject: Fwd: Rift over cannabis
Date: Monday, April 5, 2021 1:30:49 PM

Susan Gorin

1st District Supervisor
County of Sonoma

*Be #SonomaSmart – Wash hands, wear masks, keep the distance.
It's all about community.*

575 Administration Drive, Room 100A
Santa Rosa, CA 95403
www.sonoma-county.org
susan.gorin@sonoma-county.org
Direct 707-565-2982
Cell 707-321-2788



Begin forwarded message:

From: Jeffery Matthews
Date: April 5, 2021 at 1:27:04 PM PDT
To: Robert Nissenbaum , letters@pressdemocrat.com, concerned citizens , David Rabbitt , Lynda Hopkins , district4 , Susan Gorin , district3 , Clo Hair
Subject: **Rift over cannabis**

EXTERNAL

The 100' buffer from property lines and 300' from residences is wholly inadequate. The growers want to characterize their operations as just another agricultural crop, but not so. In the event of a wildland fire or a fire generated within their facility their crop becomes a toxic emergency. How can we be expected to evacuate ourselves, family and animals in such an event? What about the cache of volatile chemicals used to extract cannabis oils and byproducts? I find it incredible that Lynda Hopkins demands data from the Neighborhood Coalition yet the Board of Supervisors or their appointed Commissioners provide

no data to support any of the decisions they arrive at. No best practices from other communities or studies of impacts on rural communities. We've had the opportunity to submit questions to the Commission and Board but receive no answers. How can that be consistent with the original goal of neighborhood compatibility? It is quite clear the only interest the Board of Supervisors has is to throw the citizens of Sonoma County under the bus for increased tax revenues. There needs to be a minimum 1000' buffer zone from property lines of rural residential communities.

Jeff Matthews
6625 Hillview Street
Petaluma, CA
707-799-2198

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From: no-reply@sonoma-county.org
To: [BOS](#)
Subject: Issue: Outdoor Cannabis permits
Date: Sunday, April 4, 2021 11:41:38 AM

Sent To: County of Sonoma

Topic: Issue

Subject: Outdoor Cannabis permits

Message: I am not in favor of issuing outdoor permits for the growing of cannabis. I think we have enough environmental problems with out adding this feature.

Thank you for considering my request.

Moira Sornstein

Sender's Name: Moira Sornstein
Sender's Email: moira@sonic.net
Sender's Home Phone: 7075799002
Sender's Address:
2624 Hidden Valley Dr
Santa Rosa, CA 95404

From: [Susan Gorin](#)
To: [Marcie Woychik](#)
Subject: Fwd: for your attention
Date: Monday, April 5, 2021 1:32:24 PM
Attachments: [NBLC letter.docx](#)

Susan Gorin

1st District Supervisor
County of Sonoma

*Be #SonomaSmart – Wash hands, wear masks, keep the distance.
It's all about community.*

575 Administration Drive, Room 100A
Santa Rosa, CA 95403
www.sonoma-county.org
susan.gorin@sonoma-county.org
Direct 707-565-2982
Cell 707-321-2788



Begin forwarded message:

From: Rachel Zierdt
Date: April 5, 2021 at 12:47:14 PM PDT
To: Susan Gorin
Subject: for your attention

EXTERNAL

----- Forwarded message -----
From: **Rachel Zierdt** <rzierdt@gmail.com>
Date: Sun, Apr 4, 2021 at 8:15 PM
Subject: For the council via Cynthia Murray
To: <info@northbayleadership.org>, <rzierdt@gmail.com>

Please find the attached letter.
Regards,

Rachel Zierdt

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Warning: If you don't know this email sender or the email is unexpected, **do not** click any web links, attachments, and **never** give out your user ID or password.

Dear North Bay Leadership Council,

Quoting from your letter to Board President Hopkins. "The cannabis industry is a bright light for the Sonoma County economy now and in the future, if we allow the industry to flourish and reach its potential to produce good jobs, provide more revenue for local governments and local businesses, and boost tourism. The industry has been stymied by a regulatory morass and over-taxation that has stunted its growth when it is sorely needed to help with our economic recovery.

North Bay Leadership Council (NBLC) wants to see the cannabis industry become a marquee product of Sonoma County like other ag related businesses such as wine, cheese and beer."

I am totally aghast at the audacity of your group to make such broad pronouncements. I am wondering on whose behalf these assertions are being made?....the organizations that your members represent or the individuals and their own ideas? I, for one, am uncomfortable that many organizations which I am a part of are seen here seemingly endorsing this "bright light for the economy." If this is a reflection of policies of the individual organizations, I will be rethinking my associations with them. If it's the thoughts of individuals, then I think your letter is misleading.

I am also bothered by the fact that some of your members and their organizations are from Marin. Why are they weighing in on a clearly Sonoma County issue?

It is obvious to me that your members, not a one, lives within 300 feet of a grow. If they did they would not feel that this ordinance is the way to go . There is a place for cannabis somewhere in Sonoma County, but this ordinance doesn't address the proper places – just a helter skelter approach without much concern as to water usage, neighborhood compatibility, over concentration, oversight, lack luster permitting process. It was written in a lopsided manner with input by the industry alone without regard to residents.

I applaud the fact that the group noted some flaws to the county. You might consider asking the county why they have not checked with other counties to see what has worked and what has not might be a good way to start. I hate to have our county become an experiment. This county has a poor record in policing its former ordinance let alone admit that something is a failure. It is obvious that the cannabis industry is pushing so hard in Sonoma County because neighboring counties have barred its production. Our soil is supposed to make the taste of the product special. If so, why is it grown in pots? And the sun is so wonderful. Why is it grown in hoop houses? Our weather allows 3-4 harvests a year extending the pain to neighbors when the growing of this crop is foisted on them. This is a homeowners' nightmare. Try selling a home that is next to a grow.

As to your process at arriving at your conclusions...Who has vetted this new ordinance? How did you come up with these suggestions? Was it a total group effort? Is it the work of a few with the concurrence of all? Why a marquee product? No other industry mentioned below (wine, cheese, beer) interferes with the quality of life issues that cannabis does....security, 24/7 activity, using 6X the amount of water than vineyards. (just to name a few of the issues)

And I would also like to remind your membership that it is not an AG business.....it is not classified as an agricultural crop even though the county would like to wave a magic wand and make it one. And it needs to be strictly regulated despite the hue and cry by the industry as being over taxed and stunted in its growth.

If your group is so inclined, I would gladly find a someone more versed than I to speak to your NBLC so your members may get a more measured approach of what is being proposed.

Regards,
Rachel Zierdt

From: [Tess](#)
To: [Cannabis](#)
Subject: ordinance
Date: Monday, April 5, 2021 8:41:34 PM

EXTERNAL

Hello,

I have many concerns about the expanding cannabis industry moving into Sonoma County. One of my biggest concerns is the effect on my well and the water table in general. I'm also concerned about the noise, smell, danger and impact on my country gravel road. I would like to see an EIR done to gauge what the impact is and I'd like to see it grown in more appropriate areas, away from neighborhoods. Neighborhood feedback is critical. Please don't shut us out of the process.

My neighbor, John Lobro, at 1700 Barlow Lane in Sebastopol grew cannabis in his warehouse illegally for 10 years. He did not make an attempt to go legal when given the opportunity. Instead, he kept growing illegally until he was discovered by code enforcement and fined. Now, within a few months he has been given permits to grow 20,000 sq ft of cannabis, in hoop houses, in the Atascadero riparian zone. He continued to do illegal activity by grading before he had a permit and cutting down several oak trees. County staff was informed of this illegal activity, but did not hold him accountable, instead, rewarding him with two permits.

After listening to many people call in to the Planning Commission zoom meeting last month, I don't understand why so many of them have been waiting for years for their permit, while my neighbor obtained two permits within months. This is not a good start to a new industry and I worry that more of this misuse of the permit process will happen on a grand scale.

I'm not opposed to cannabis. It is an amazing medicine. However, what I have seen so far in my own neighborhood has me questioning the entire process. It is crucial that this ordinance is done right.

Sincerely,

Tess Danaher

1680 Barlow Lane

Sebastopol

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From: [Diana Smith](#)
To: [Cannabis](#)
Subject: Cannabis permits
Date: Tuesday, April 6, 2021 3:26:45 PM

EXTERNAL

As a resident of Sonoma county, I would like to express my dismay and dissatisfaction with the direction the state marijuana approval is moving our county. The interests of residents, health, and safety should come first. This new agri business should not be allowed to buy it's way in. The large water usage and the foul smell are just two of the many ways the people of our. County will be impacted. Already there are examples of residents being impacted and ignored when they seek help from the county. Please don't sell out our environment, health, and tourist industry to the cannabis growers. Most of whom are coming here to make a buck.

Sent from my iPad

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From: [Fran Tett](#)
To: [Cannabis](#)
Subject: REJECT CANNABIS
Date: Wednesday, April 7, 2021 9:23:42 AM

EXTERNAL

The Sunday, April 4, Press Democrat back page nailed the cannabis growth explosion in our County. In the 70's we complained about the vineyards takeover of our Pear and Walnut orchards to no avail, money speaks. Our water table dropped, some wells were affected, but new dams and reservoirs helped control the reduction. Have we forgotten? The proposed 60,000 acre open to cannabis will not only severally affect our water supply, which is unacceptable, let alone the odious smell, and of course the probable crime increase. Look at our present reservoirs vanishing water levels today and tell us it is O.K. to let the unquenchable cannabis fields take the remaining levels and surface water. We are once again moving rapidly into a drought, water rationing, etc., to follow situation. Cannabis fields will impact severally everyone's water. Is this probable impact on all residents truly worth the implied tax money to the county? I can think of no other reason for approval. This old codger asks you to please reject this ordinance.

Thank you,

Bill Tett
130 Anacapa Drive
Santa Rosa, CA 95403
707-843-7714

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From: [Chelsea Holup](#) on behalf of [PlanningAgency](#)
To: [Cannabis](#)
Subject: FW: A proposal to give the Agricultural Commissioner's Office more authority to issue cultivation permits without public notice or a hearing,
Date: Wednesday, April 7, 2021 1:39:02 PM

From: Dmitry Korenkov <dmitry.korenkov@genesys.com>
Sent: April 04, 2021 3:37 PM
To: PlanningAgency <PlanningAgency@sonoma-county.org>
Cc: Oxana Balbashova <balbashova@gmail.com> (balbashova@gmail.com) <balbashova@gmail.com>
Subject: A proposal to give the Agricultural Commissioner's Office more authority to issue cultivation permits without public notice or a hearing,

EXTERNAL

My name is Dmitry Korenkov, I am a resident, taxpayer and voter living Sonoma County. I am completely outraged by the proposal to give the Agricultural Commissioner's Office more authority to issue cultivation permits without public notice or a hearing. I know from personal experience how strong the cannabis smell and it can spread for miles from the growing site. I know from personal experience that even hemp pollen can cause intoxication; the cannabis pollen may cause severe intoxication. I don't want cannabis within miles around my property or any of the schools. My property got dry well, and the Sonoma county is facing a severe water shortage. I don't want water to be waster on cannabis. I want to have clean air, and I have a right to have a clean air. I don't want to open a gate for corruption on cannabis permits approval without public involvement. I am totally against this proposition. This issue is the most important issue , and your voting on it (and only you vote on it) will determine my vote on the next election.

Thank you,

Dmitry Korenkov
2499 Eastman Ln,
Petaluma, CA 94952

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From: [Maira Sornstein](#)
To: [Cannabis](#)
Subject: Revised Cannabis Ordinance
Date: Wednesday, April 7, 2021 2:23:48 PM

EXTERNAL

To Whom this may concern.

I would like you to know my opinion of allowing permits for cannabis to be grown outdoors.

1. We are in a fire area each and every year
2. We are usually in a drought area each and every year
3. I don't like the idea of massive cannabis growing in this lovely area. Particularly with the above conditions.

We live in trepidation each year, worrying if we are going have to evacuate , worrying if our homes are going to be burned down or have enough water to put out fires in addition to just having water for our daily needs.

There are are so many environmental problems now that adding to it, IMHO, would be devastating to this county. After all, it's just Cannabis, not food.

Thank you for considering my thoughts.

Maira P Sornsten

I

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From: [Lyndi Brown](#)
To: [Cannabis](#)
Subject: Cannabis in unincorporated County areas
Date: Thursday, April 8, 2021 6:09:38 PM

EXTERNAL

Dear Commissioners,
Re Cannabis in unincorporated County areas:

300 feet setback from residences isn't enough. Please increase to 1000 feet or more, as other counties have done in residential neighborhoods.

Why hasn't an EIR been done on such an important decision?

I'm concerned about water usage.

Thank you for considering,
Lyndi Brown

Lyndi Brown | PO Box 1030, Penngrove CA 94951 | 707 795-1107 (land line) | Lyndi@sonic.net

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From: no-reply@sonoma-county.org
To: [Cannabis](#)
Subject: Cannabis Program: Cannabis setbacks
Date: Thursday, April 8, 2021 10:50:02 AM

Sent To: County of Sonoma
Topic: Cannabis Program
Subject: Cannabis setbacks
Message: Re Cannabis in unincorporated County areas:

300 feet setback from residences isn't enough. Please increase to 1000 feet or more, as other counties have done in residential neighborhoods.

Why hasn't an EIR been done on such an important decision?

I'm concerned about water usage.

Thank you for considering,
Lyndi Brown

Lyndi Brown | PO Box 1030, Penngrove CA 94951 | 707 795-1107 (land line) | Lyndi@sonic.net

Sender's Name: Lyndi Brown
Sender's Email: lyndi@sonic.net
Sender's Home Phone: 7077951107
Sender's Address:
PO Box 1030
Penngrove, CA 94951-1030

From: [Arielle Kubu-Jones](#)
To: [Cannabis](#)
Subject: FW: Less-than-healthy plan
Date: Friday, April 9, 2021 11:04:42 AM

From: craigspencerharrison@gmail.com <craigspencerharrison@gmail.com>
Sent: Friday, March 26, 2021 2:19 PM
To: Susan Gorin <Susan.Gorin@sonoma-county.org>
Subject: RE: Less-than-healthy plan

EXTERNAL

Thanks, Susan.

Understood. The revised ordinance and the SMND are long, complicated, wordy, and often inconsistent.

This is a very specific issue related to “right to farm,” and the absence in Chapter 38 of the Health and Safety clause that is in the chapter 26 cannabis ordinance (26.88.250(f)):

Health and Safety. 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.

Growers don't want anyone having the right to take legal action when their business activity harms neighbors. It would be nice if you would tell the public whether you think the right of cultivators to grow commercial cannabis is so important that you want individuals, including those with breathing problems, to lose the right to file a nuisance suit when the chemicals from the grower's plants invade homes and yards.

You might ask your commissioner to make sure this provision is added to Chapter 38. That would fix this problem.

Thank you for your interest in this issue.

Craig S. Harrison
4953 Sonoma Mountain Road
Santa Rosa, CA 95404
707-573-9990
<https://www.craigsharrison.net/>

From: Susan Gorin <Susan.Gorin@sonoma-county.org>
Sent: Friday, March 26, 2021 1:14 PM
To: Craig Harrison <craigspencerharrison@gmail.com>
Subject: Re: Less-than-healthy plan

I haven't read the policy in depth, but I am working with my planning commissioner on significant revisions to the policy.

Thanks.

Susan Gorin

1st District Supervisor
County of Sonoma

*Be #SonomaSmart – Wash hands, wear masks, keep the distance.
It's all about community.*

575 Administration Drive, Room 100A
Santa Rosa, CA 95403
www.sonoma-county.org
susan.gorin@sonoma-county.org
Direct 707-565-2982
Cell 707-321-2788

|

On Mar 25, 2021, at 4:56 PM, Craig Harrison <craigspencerharrison@gmail.com> wrote:

EXTERNAL

Dear Susan:

I'm wondering if you agree with this policy in the proposed ordinance.

Craig Harrison

<https://www.pressdemocrat.com/article/opinion/thursdays-letters-to-the-editor-386/>

Less-than-healthy plan

EDITOR: Sonoma County's vision for public health is to make our county the healthiest in California. But is this just an empty slogan? The supervisors' proposed revisions to the cannabis ordinance remove health, safety and nuisance protections for neighbors who are exposed to pungent terpene odors.

In 2018, a group of Petaluma area residents successfully sued a cannabis grower for nuisance when odors impinged on their homes. The Press Democrat reported

that the stench caused significant breathing problems for an adult with asthma and a young paraplegic who needed a breathing tube.

Is this how our aspiring healthiest county will now treat residents with health conditions who are exposed to chemical nuisances? Just live with it or move?

The ordinance also proposes that growers be allowed to subject neighbors to unproven techniques that blow plant oil aerosols or oxidizing agents into the air next to their yards. The long-term safety of inhaling these chemicals has not been tested in children, pregnant women, people with asthma or even healthy adults. This isn't my vision of the healthiest county in California.

CRAIG S. HARRISON

Santa Rosa

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From: [Alexandria Sullivan](#) on behalf of [PlanningAgency](#)
To: [Cannabis](#)
Subject: FW: No on Revised cannabis ordinance
Date: Friday, April 9, 2021 8:15:56 AM

-----Original Message-----

From: Daniel McCoy <danmccoy74@yahoo.com>
Sent: Thursday, April 8, 2021 5:24 PM
To: [PlanningAgency](mailto:PlanningAgency@sonoma-county.org) <PlanningAgency@sonoma-county.org>
Subject: No on Revised cannabis ordinance

EXTERNAL

I live in district 2 and recently attended a meeting with Supervisor Rabbit and members of our community. It is heart wrenching that our government is going to sell out our beautiful rural community in the name of weed money. Allowing these large grows to be ministerially permitted will vastly increase the number of these grows and is going to fundamentally and irreversibly change the character of our community and the county. This draft is obviously the work of much lobbying and back room dealing with the cannabis industry. The county must reject these industry friendly changes now before it is too late. This opening of the flood gates is going to devastate our rural community and the things that make Sonoma county a place we all love. And when we are driven out and the county is completely beholden to this one special Interest do you think they will stop? Reverse course now! No ministerial permitting, no weed tours, 1000 foot set back from all residential property lines mandatory landscaping masking grows. Frankly no cannabis grows outdoors at all is the only thing that makes sense. Indoors in industrial zones only!

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From: [Sou Garner](#)
To: [McCall Miller](#)
Subject: Fwd: you can make this go away
Date: Friday, April 9, 2021 9:21:59 AM

EXTERNAL

Good Morning,

Please see the message below.

Cheers,
Sou

Southisone S. Garner, MPA

*Project Manager/Planner
she/her/hers*



PLANNING | DESIGN | COMMUNICATIONS | MANAGEMENT | SCIENCE | TECHNOLOGY

431 I Street, Suite 108

Sacramento, California 95814 USA

office: 916-329-8897 extension: 5020

sgarner@migcom.com

www.migcom.com

[facebook](#) [twitter](#) [linkedin](#) [instagram](#)

----- Forwarded message -----

From: Mrs Pepper <yklq50@yahoo.com>
Date: Fri, Apr 9, 2021 at 8:19 AM
Subject: you can make this go away
To: sgarner@migcom.com <sgarner@migcom.com>

Good morning Sou,

I would imagine you might be pretty tired of hearing about cannabis grow conflicts. I feel for you! You can however resolve it.

The entire conflict boils down to one thing: allowing grow operations on a minimum of 10 acre parcels. 10 acres means they end up in rural residential neighborhoods. A lot of them.

It isn't rocket science to see how inappropriate it is to put these industrial-like operations, with their odor, their trucking, their high walled fencing and security lights and cameras, the very real risk of crime hitting the neighborhood, into rural residential neighborhoods. No other county is permitting it because it is so obviously a bad idea.

The solution is simple: require growers to either operate on much larger parcels, or in industrial parks that have the infrastructure more suited to an industrial-like operation, which cannabis is.

Sincerely,

Kate Kingsley
Petaluma

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From: [Jennifer Klein](#)
To: ["Que Sera sera"](#)
Cc: [Cannabis](#)
Subject: RE: the cannabis ordinance
Date: Friday, April 9, 2021 7:48:01 PM

Good evening,

Thank you very much for your thoughts and participating in the public process. I am copying cannabis@sonoma-county.org so that your comments below can be included with other comments provided to the Board of Supervisors as part of its future consideration of the draft cannabis ordinance. More information can be found at: <https://sonomacounty.ca.gov/cannabis-program/>

Best regards,

Jennifer

Jennifer C. Klein, Chief Deputy
Office of the County Counsel
575 Administration Drive, 105A
Santa Rosa, CA 95403
Tel. 707.565.2421
Dir. 707.565.6007
Fax 707.565.2624

From: Que Sera sera <moonbelly88@gmail.com>
Sent: Friday, April 9, 2021 12:41 PM
To: Jennifer Klein <Jennifer.Klein@sonoma-county.org>
Subject: the cannabis ordinance

EXTERNAL

Hi Jennifer,

First, thank you for your service to our county. We are writing because we support our local farmers, our local economy, and cannabis could be a big boon for both.

What we dont support, and find astonishing that anyone would, is allowing cannabis farms next to rural neighborhoods.

Cannabis farming isnt the least like any other ag crop. It is much more akin to an industrial product, and should be grown in industrial parks. More secure, no traffic conflicts, no visual eyesores, water and sewage infrastructure already there, and no neighborhood destruction. Or at the very least, require them out in the really rural parts of the county, on big acreage away from neighborhoods where currently the crop can be 300 feet from a house. Imagine it's your house!

You are an attorney. You must see that if county officials fail to grasp the truth of this, there will be no end of litigation, for years to come. And with litigation, everybody loses.

Please think seriously about this, and talk to the board. These problems should be obvious,

but for some reason, and unlike any other county, our county officials seem blind on this one.

Thank you for listening to us. We speak for many.

Sincerely,

Pepperland in Petaluma

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From: [Anna Peterka](#)
To: [Cannabis](#)
Subject: STOP cannabis project
Date: Sunday, April 11, 2021 9:37:05 AM

EXTERNAL

We have a shortage of water, we don't need another nonsense project in the Sonoma county. And the the water agency is going to raise our water bill. Great! Just take a look what your "landscaping" on Fiscal Dr. looks like. Disaster.

You can't keep it green around your offices, yet, you want to waste water on huge cannabis project. Who is running Sonoma county? Or, should I say: "who is ruining Sonoma county" .

We have to keep our properties clean. It's about time for our elected officials do the same.

Clean up the city, clean up the county, before starting another useless project, which will be a disaster for the people in our county.

Thank you.

Sincerely,
Anna Peterka

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From: no-reply@sonoma-county.org
To: [Cannabis](#)
Subject: Cannabis Ad Hoc Committee: Cannabis and Water usage.
Date: Sunday, April 11, 2021 3:35:15 PM

Sent To: County of Sonoma
Topic: Cannabis Ad Hoc Committee
Subject: Cannabis and Water usage.

Message: I am very concerned at the county's rush to approve cannabis farms without taking input from the affected neighbors. Sonoma county has a water shortage that is only going to get worse. To approve these farms while ignoring the many problems associated with cannabis production is incredibly short sighted.

When these farms begin to drain the watertable in neighborhoods with wells what recourse do these people have?

Hopefully there will be many lawsuits levelled against the county, who in their rush to cash in on their latest cash cow have trampled all over neighbor's rights.

I'm fairly certain none of you approving this have a 20,000 sq. foot cannabis farm right next to their yard.

You approved a farm on Barlow Lane in Sebastopol who has for the last few years growing pot illegally.

He has graded, cut down trees and been very confrontational to any one who says anything. The man is an unmitigated bully who never got approval for all the illegal grading, water use, etc. And yet you happily, greedily approved his permit.

Commercial cannabis production does not belong in neighborhoods!

I and many others plan on voting out any of the morons in the county that are supporting this.

Drought conditions are going to be our reality as our environment continues to decay. To approve something that uses large amounts of water for each plant is irresponsible, shortsighted and down to the almighty dollar!

Sender's Name: Marty Ann
Sender's Email: martyann00@yahoo.com
Sender's Cell Phone: 707-290-8234
Sender's Address:
Santa Rosa, CA 95404-1812

From: [Scott Orr](#)
To: ["Anna Ransome"](#)
Cc: [Tennis Wick](#); [Cannabis](#)
Subject: RE: Referral to Agencies
Date: Monday, April 12, 2021 8:45:13 AM
Attachments: [image001.png](#)
[image002.png](#)
[image003.png](#)
[image004.png](#)

Hi Anna, you'll typically only see referral lists on use permits. Ordinance updates do not go through the same process and it's primarily through CEQA process that other agencies comment on code updates. I've copied the main Cannabis email in case there is anything additional to add; although Permit Sonoma is involved with the ordinance update we are not the lead on the project. Happy to discuss further if you have questions on referral practices in general.

Scott Orr

Deputy Director of Planning
www.PermitsSonoma.org
County of Sonoma
Planning Division
2550 Ventura Avenue, Santa Rosa, CA 95403
Direct: 707-565-1754 | Office: 707-565-1900



Due to the Public Health Orders, online tools remain the best and fastest way to access Permit Sonoma's services like permitting, records, scheduling inspections, and general questions. You can find out more about our extensive online services at PermitsSonoma.org.

The Permit Center has reopened with limited capacity and modified hours. Monday, Tuesday, Thursday, Friday: 9:00 AM – 1:00 PM; Wednesday, 12:00 PM – 4:00 PM.

Thank you for your patience as we work to keep staff and the community safe.

From: Anna Ransome <ransome@sonic.net>
Sent: Saturday, April 10, 2021 11:58 AM
To: Scott Orr <Scott.Orr@sonoma-county.org>
Cc: Tennis Wick <Tennis.Wick@sonoma-county.org>
Subject: Referral to Agencies

EXTERNAL

Hello Scott,

When the Chapter 26 and 38 and the General Plan Amendment were downloaded to the County website in January I didn't see any list of referrals to agencies that would typically be attached. Would you please send me the list? The only list I can find is on page 2 & 3 of the SMND, copied below, but there is no information about who was contacted or their contact information. Were all the agencies listed below notified?

Thank you.

Anna Ransome

RESPONSIBLE AND TRUSTEE AGENCIES

There are no responsible or trustee agencies as the Sonoma County Board of Supervisors only has approval authority over the updated Ordinance and General Plan Amendment. However, approval from the agencies listed below may be required to construct and/or operate projects proposed under the updated Ordinance and General Plan Amendment.

Table 2. Agency Activities and Authorizations

Agency

Activity

Authorization

U. S. Army Corps of Engineers

Wetland dredge or fill

Clean Water Act, Section 404

U. S. Army Corps of Engineers

Work in navigable waters

Rivers and Harbors Act, Section 106

Regional Water Quality Control

Discharge or potential discharge

California Clean Water Act

Draft Subsequent Mitigated Negative Declaration

Page 3

File# ORD20-0005

Board (North Coast or San Francisco Bay)

to waters of the state

(Porter Cologne) – Waste Discharge requirements, general permit, or waiver

Regional Water Quality Control Board (North Coast or San Francisco Bay)

Wetland dredge or fill

Clean Water Act, Section 401

State Water Resources Control Board

Generating stormwater (construction, industrial, or municipal)

National Pollutant Discharge Elimination System (NPDES) requires submittal of NOI

California Department of Fish and Wildlife

Lake or streambed alteration

Fish and Game Code, Section 160 2

California Department of Fish and Wildlife
Incidental take permit for state-listed species
California Endangered Species Act ; Fish and Game Code, Section 2081
California Department of Food and Agriculture (CalCannabis)
Cannabis Cultivation
Cannabis Cultivation Standards and Licensing
California Bureau of Cannabis Control
Cannabis Events, Distribution, and Retailer
Cannabis Events, Distribution, and Retail Standards and Licensing
California Department of Public Health
Cannabis Cultivation, Manufacturing, Distribution, and Retailing
Cannabis Cultivation, Manufacturing, Distribution, and Retailing Standards and
Licensing
Bay Area Air Quality Management District (BAAQMD)
Stationary air emissions
BAAQMD Rules and Regulations (Regulation 2, Rule 1 – General Requirements;
Regulation 2, Rule 2 – New Source Review; Regulation 9 – Rule 8 – NOx and CO
from Stationary Internal Combustion Engines; and other BAAQMD administered
Statewide Air Toxics Control Measures (ATCM) for stationary diesel engines
Northern Sonoma County Air Pollution Control District (NSCAPCD)
Stationary air emissions
U. S. Fish and Wildlife Service (FWS) and or National Marine Fisheries Service
(NMFS)
Incidental take permit for listed plant and animal species
Endangered Species Act
Caltrans Encroachment
Activities within a state highway
State Lands Commission
Activities in State Lands Commission jurisdiction
Lease required?
Native American Heritage Commission
State Historic Preservation Office

Thank you.

Anna Ransome

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From: [Dani La Noire](#)
To: [Cannabis](#)
Subject: No Cannabis in our Neighborhoods please
Date: Monday, April 12, 2021 11:07:54 AM

EXTERNAL

Hello,

I am writing to you as a very concerned property and homeowner, as well as a human being, who lives in a neighborhood where a significant grow operation has been proposed.

While I think we all understand that commercial cannabis is a freight train rolling into our county, what is difficult to come to terms with is the placement and lack of proper questioning regarding these operations.

Aside from the general concern of water resources, environmental impact and increased traffic flow, there are also great concerns about our personal safety and the quality of our lives if this type of operation is dropped in our backyards. Why do you not require these commercial businesses to function outside of residential neighborhoods. There is a ton of open land in Sonoma County where this wouldn't even be an issue, yet you choose to put it in our backyards.

The Pepper Rd cannabis permit stands to change all of these things for us. My husband has owned this property for decades. He bought it because it was located in a country neighborhood, where he could raise his kids in the outdoors and away from the crime of our bay area cities. We now have grandchildren and nieces and nephews that spend time with us here.

We are concerned for their safety and our own. Not to mention the fear of our water source, our only water source, being run dry due to the requirements of this farm just .6 miles from our home. And no matter how much filtration you are requiring, there will still be an order like none other.

As a Realtor, I have seen this many times in Sonoma County, where someone throws in a small farm, maybe 50 plants at most and the smell is so overpowering, even the indoors can't prevent it. Many of my clients have had to sell their homes to get away from it. And let me tell you selling a home next to a pot farm is not a shoe-in, even with reduced inventory levels in Sonoma County.

With all of these concerns, that I know have been raised multiple times, the fact that you would even consider a measure that would allow these permits to be an over the counter process is completely insane. The county makes it nearly impossible, overly costly and very time consuming for us to do simple repairs to our homes, upgrades to our wells and septic, improvements to our property without jumping through some serious hoops, yet you are proposing to simplify the process of commercial cannabis operations to an easy over the counter permit, but a person who knows nothing of our concerns. It clearly shows how little you all care about the residents of this county.

It is deeply disappointing and extremely angering and our voices will be heard!

Shame on all of you for doing this to this beautiful county, all for the money grab known as commercial cannabis.

Dani & Luis La Noire

--

Dani La Noire
Realtor®
DRE#: 01957008
c: 415.717.6942
dani.lanoire@compass.com
11 5th St, Suite 201
Petaluma | CA | 94952

<https://www.compass.com/agents/danielle-la-noire/>



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From: [Mrs Pepper](#)
To: [Cannabis](#)
Subject: location location
Date: Monday, April 12, 2021 12:00:18 PM

EXTERNAL

Greetings,

I am a huge supporter of our local farmers. I am writing you regarding the growing conflict in the county between cannabis farming vs rural neighborhoods. I want to make sure you understand that the residents in these neighborhoods are not anti farmers, not anti-grow. That is not the issue at all. The issue, quite simply, is allowing these farms on a minimum of 10 acre parcels next to residential neighborhoods, where plants can be within 300 feet of someone's house.

Cannabis grow operations are fundamentally different from other agricultural crops in that they require high fencing, security lights and patrolling, they produce strong odor around the clock for multiple months (the dairy industry produces a fraction of the amount of odor), and they attract crime.

To put operations with these features next to or within rural residential neighborhoods *makes no sense*. There will be a dramatic increase in truck traffic on the neighborhood roads, and a real risk of adversely affecting the output of adjacent wells.

The solution is so simple: either put grow operations on much larger parcels than 10 acres, or put them in industrial parks, which have infrastructure much more suited to cannabis production.

All other bay area counties see the incompatibility of cannabis operations adjacent to neighborhoods.

Ask yourself this question: would you be OK with one on or near your street, where it can be 300 feet from your door? If your answer is no, then how is it OK to put them next to other people's homes?

Again, this is not an issue of pro grow vs anti pro grow. It is simply a location issue. Please make this clear to your constituents. Hopefully, through greater understanding, this conflict can find common ground for a resolution.

Thank you,

Kate Kingsley

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From: [Andrew Smith](#)
To: "[Rue Furch](#)"; [Susan Gorin](#); [Matt@Waterboards St.John](mailto:Matt@Waterboards.St.John); [Kayson Grady](#); [Rick Rogers](#); Corinne.Gray@wildlife.ca.gov; [Jenna Von Esmarch](#)
Cc: [Cannabis](#); [McCall Miller](#); [Christina Rivera](#)
Subject: RE: Cannabis - a Threshold / Tiered approach to permitting
Date: Monday, April 12, 2021 10:25:16 AM
Attachments: [image001.png](#)

Hi Rue,

Thank you very much for your ideas and your feedback on the county cannabis program and our permitting processes. The goal is to always have a discretionary permitting process in addition to a ministerial permitting process that is equal to or more restrictive in its standards than the discretionary pathway. I believe this would address some of your ideas relative to mitigations, discretion, and public participation and hearings. I have forwarded this message to the cannabis program email so that your comments can be considered where all other comments are being received and processed.

Cheers,
Andrew

Andrew Smith

Agricultural Commissioner / Sealer of Weights & Measures
Sonoma County Department of Agriculture
133 Aviation Blvd., Ste. 110
Santa Rosa, CA 95403
(707)565-2371
Fax: (707)565-3850

“That land is a community is the basic concept of ecology, but that land is to be loved and respected is an extension of ethics.”

— [Aldo Leopold](#)

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From: Ruess <ruepqrst@gmail.com>
Sent: Monday, April 12, 2021 10:06 AM
To: Susan Gorin <Susan.Gorin@sonoma-county.org>; Matt@Waterboards St.John <Matt.St.John@waterboards.ca.gov>; Kayson Grady <kason.grady@waterboards.ca.gov>; Rick Rogers <rick.rogers@noaa.gov>; Corinne.Gray@wildlife.ca.gov; Jenna Von Esmarch <Jenna.VonEsmarch@sen.ca.gov>; Andrew Smith <Andrew.Smith@sonoma-county.org>
Subject: Cannabis - a Threshold / Tiered approach to permitting

EXTERNAL

Good morning,

Please implement a threshold based application process for cannabis operations. I suggest in simplest terms that three tiers be employed:

- 1) Ministerial permits issued for applications that meet definable/measurable standards that are determined to require NO mitigations.
- 2) Public hearings required for all applications that would fall into a mitigatable category - with clear measurable and achievable Conditions of Approval.
- 3) Applications beyond the limits of conditioning without thorough environmental analysis require an EIR.

There will certainly be specific language and very possibly far greater nuance necessary to employ this process, and I've not attempted to "get into the weeds" here. This is conceptual.

Several years ago Agencies and Departments met to consider this approach and it was well received as it would allow permit processing that could expedite review if all applications included information that would inform all Agencies and jurisdictions simultaneously.

Funding should also be provided for ongoing monitoring. There are several methods for this and should be worked out prior to project approvals.

Thank you all very much for your continuing efforts to get this right. No small task.

Take good care. Stay well.
Rue

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From: [Rue](#)
To: [Andrew Smith](#)
Cc: [Susan Gorin](#); Matt@Waterboards.St.John; [Kayson Grady](#); [Rick Rogers](#); Corinne.Gray@wildlife.ca.gov; [Jenna Von Esmarch](#); [Cannabis](#); [McCall Miller](#); [Christina Rivera](#)
Subject: Re: Cannabis - a Threshold / Tiered approach to permitting
Date: Monday, April 12, 2021 10:32:36 AM

EXTERNAL

Thank you very much Andrew,
I did submit this concept to the cannabis email address prior to the Commission hearing - but was asked about it again, so this is a re-send.

Threshold permitting is not a new idea and has been used by the County in much the way I described for other types of permits. As is usual, the devil is in the details - but the impacts have been pretty clearly spelled out, so limits, Conditions and exceptions (in the case of CEQA analysis with specific standards) could be applied with metrics that should remove continuing questions.

Your interest and consideration is much appreciated.

Have a great week,
Rue

On Apr 12, 2021, at 10:25 AM, Andrew Smith <Andrew.Smith@sonoma-county.org> wrote:

Hi Rue,

Thank you very much for your ideas and your feedback on the county cannabis program and our permitting processes. The goal is to always have a discretionary permitting process in addition to a ministerial permitting process that is equal to or more restrictive in its standards than the discretionary pathway. I believe this would address some of your ideas relative to mitigations, discretion, and public participation and hearings. I have forwarded this message to the cannabis program email so that your comments can be considered where all other comments are being received and processed.

Cheers,
Andrew

<image001.png> *Andrew Smith*

Agricultural Commissioner / Sealer of Weights & Measures
Sonoma County Department of Agriculture
133 Aviation Blvd., Ste. 110
Santa Rosa, CA 95403
(707)565-2371

Fax: (707)565-3850

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— [Aldo Leopold](#)

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From: Ruess <ruepqrst@gmail.com>

Sent: Monday, April 12, 2021 10:06 AM

To: Susan Gorin <Susan.Gorin@sonoma-county.org>; Matt@Waterboards St.John <Matt.St.John@waterboards.ca.gov>; Kayson Grady <kason.grady@waterboards.ca.gov>; Rick Rogers <rick.rogers@noaa.gov>; Corinne.Gray@wildlife.ca.gov; Jenna Von Esmarch <Jenna.VonEsmarch@sen.ca.gov>; Andrew Smith <Andrew.Smith@sonoma-county.org>

Subject: Cannabis - a Threshold / Tiered approach to permitting

EXTERNAL

Good morning,

Please implement a threshold based application process for cannabis operations. I suggest in simplest terms that three tiers be employed:

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There will certainly be specific language and very possibly far greater nuance necessary to employ this process, and I've not attempted to "get into the weeds" here. This is conceptual.

Several years ago Agencies and Departments met to consider this

approach and it was well received as it would allow permit processing that could expedite review if all applications included information that would inform all Agencies and jurisdictions simultaneously.

Funding should also be provided for ongoing monitoring. There are several methods for this and should be worked out prior to project approvals.

Thank you all very much for your continuing efforts to get this right. No small task.

Take good care. Stay well.
Rue

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From: [Rebecca Matlick](#)
To: [Cannabis](#)
Subject: BZA Meeting 4/15
Date: Monday, April 12, 2021 2:37:31 PM

EXTERNAL

Hello,

It is my understanding that we are to make comments/suggestions to the planning commission in regards to the proposed cannabis ordinance. My comment is below:

As a resident of Sonoma County, I appreciate both the richness of agriculture and the community we have created in this space. We must work together to create systems that serve the whole of the county. Commercial Cannabis Operations do not belong in residential zones, or on the borders of residential zones. We are currently affected by a proposed grow along Pepper Road. This is NOT appropriate for our neighborhood. - we are a mixed area comprised of agricultural land AND residential parcels. Zoning of the one parcel does not tell you enough information about the appropriateness of the proposed operation.

Please consider making buffer zones a part of the cannabis ordinance, limiting the commercial grows to solely agricultural land that does not border residential properties. Families and neighborhoods should not be affected by these grows- space is needed for safety and reduction of environmental impact on residential properties, not to mention property values and the biggest concern of all- water supply. We cannot support the cannabis ordinance as it is, amendments must be made to adequately serve the whole of the county.

Please let me know if there is another place for my comments to be made for the BZA meeting and I will submit separately.

Thank you,

Rebecca Matlick

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From: [Chelsea Holup](#) on behalf of [PlanningAgency](#)
To: [Cannabis](#)
Subject: FW: Cannabis changes
Date: Thursday, April 15, 2021 8:41:00 AM

-----Original Message-----

From: Liz Brock <lizatbrockhouse@yahoo.com>
Sent: April 13, 2021 2:28 PM
To: PlanningAgency <PlanningAgency@sonoma-county.org>
Subject: Cannabis changes

EXTERNAL

Hello to all,

I am opposed to the changes in cannabis cultivation permits.

I think the proposal as written would definitely have a negative effect on the beauty, safety and quality of life here in Sonoma County.

This crop is not comparable to any other. The fact that security is required in the proposal would suggest that this will create an attractive nuisance. Having large outdoor cultivation with no way to contain the offensive odor would also have an undeniable impact.

Please continue working on this proposal and in my opinion, Keep It Indoors.

Thank you.

Long time Sonoma County resident, Elizabeth Brock.

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Sonoma County Planning Division
2550 Ventura Avenue
Santa Rosa, CA 95403

April 8, 2021

Dear Planning Division,

I urge you to vote against any cannabis growing in Sonoma County, specifically that which would be allowed under the Commercial Cannabis ordinance on April 15, 2021.

I lived next door to a home grower who had 30 plants (at a time when the limit was 6 plants). Those 30 plants made going out of doors impossible, including gardening, home maintenance and eating on the deck, due to the smell. In addition, I could not open windows because of the smell and my car upholstery took on the odor of skunk cannabis. If this resulted from just 30 plants, I am against any further or larger growing areas.

I have a MS and BS from the college of Agriculture at the University of California, Berkeley. Unlike traditional agriculture commodities (e.g. grapes, Gravenstein apples), cannabis has an unpleasant smell which is quite strong. Further, growing cannabis is not covered under "right to farm," as it is being imposed on neighborhoods/areas which existed before cannabis growing was permitted or even imagined.

Sincerely,



Fay Shon
522 Jackson Dr.
Santa Rosa, Ca. 95409

From: [Gail Frederickson](#)
To: [Cannabis](#)
Subject: Sec 38 .12.010 CLARIFY "SCREENING"
Date: Tuesday, April 13, 2021 10:25:57 AM

EXTERNAL

Re: Section 38.12.010, Item D: Fencing, Screening, Visibility

Can you please include more SPECIFIC REGULATIONS ON WHAT MATERIALS ARE PERMITTED FOR "SCREENING" THE OPERATION, such as "VEGETATION MUST BE USED FOR SCREENING". Or at least specify "NO FABRIC MESH SCREENING" is permitted. The current draft ordinance specifies "No Razor Wire", but mentions "vegetation" where it could be interpreted as an OPTION. I have seen cannabis farms that use Construction Mesh (FABRIC) Screens (green or gray) covering 8 foot+ metal fencing over acres of the parcel. This fabric mesh screening creates a wall over large area and is more of a visual impact than whatever they are screening inside.

Please be more specific for materials used in "screening".

Thank you,
Gail Frederickson
Fulton, CA
707-697-5604

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From: [Pepper Lane No Cannabis](#)
To: [Cannabis](#); katven@yahoo.com
Subject: BZA Meeting 4/15
Date: Tuesday, April 13, 2021 6:32:26 PM

EXTERNAL

I am writing in opposition to the proposed ordinance governing cannabis cultivation in Sonoma County. This proposal will give the Agricultural Commission Office more authority to issue cannabis cultivation permits without hearings or public notices. I have to question whether the Agricultural Commissioner has done his due diligence regarding his responsibility for this possible new position based upon the previous March meeting. Has he reached out to other counties throughout the state of CA in regards to this matter to see what is working, what isn't, lessons learned, changes in their ordinance etc. For our county supervisors to even consider allowing the Agricultural Commissioner this freedom without researching all sides of the issue is not acceptable.

As important, for the supervisors to consider opening up over 65,000 acres to possible cannabis operations without further study of multiple impacts on the environment and quality of life to rural residential neighborhoods is beyond my comprehension. There should be no cannabis close to rural residential or any residential neighborhoods. In addition some zoning areas have not been reviewed or revised in over 20 years. Many parts of Sonoma County have changed in 20 years including the growth of rural residential neighborhoods. Now is the time to stop, take the necessary time to look at allowing cannabis operations in questionable zoning areas. In addition, stop, research, require major impact issues looked at and evaluated such as water depletion, increase in crime, noise, environment, and home values. EIR, CEQA, water usage review all should be required as part of the permit process.

Thank you. Look at the big picture. What's most important, our environment, air, our neighborhoods, not profit.

Respectfully,
Katie Mammen

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From: [Marcie Woychik](#)
To: [Cannabis](#)
Subject: FW: Cannabis Cultivation
Date: Tuesday, April 13, 2021 7:49:35 AM

Kind regards,

Marcie Woychik
Chief Deputy Clerk of the Board
County of Sonoma, Board of Supervisors



From: Susan Gorin [mailto:gorins@sonic.net]
Sent: Tuesday, April 6, 2021 11:18 AM
To: Marcie Woychik <Marcie.Woychik@sonoma-county.org>
Subject: FW: Cannabis Cultivation

EXTERNAL

fyi

Susan Gorin
gorins@sonic.net
Home – 707-708-8296
Cell – 707-321-2788

From: [Pat Mai](#)
Sent: Tuesday, April 6, 2021 11:00 AM
To: [Gorin, Susan](#)
Subject: Cannabis Cultivation

Susan:

We strongly oppose Cannabis Cultivation and have submitted the following to county wide newspapers. Please, protect our water and local industries by voting against any cannabis cultivation in the county.

Given the drought we are in, we wonder how the Board of

Supervisors can even contemplate a cannabis ordinance opening up even more acreage to cannabis cultivation than is currently planted to wine grapes. According to a study from Napa County, cannabis uses over 6 times more water compared to vineyards. This year in Santa Rosa where we live we have received only a little over 50% of average rainfall. Our reservoirs are low and farmers in south County are already trucking water. Residents wells are going dry in the Two Rock area. Residents are being told to limit water use. Protecting our water resources which we all value should be the number one goal of the Board of Supervisors. It is key to our future.

Marvin and Pat Mai
4743 Woodview Drive
Santa Rosa, CA 95405
(707)545-2224

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From: [Brian Lamoreaux](#)
To: [Cannabis](#)
Subject: Re: questions about commenting on county cannabis ordinances/rules
Date: Wednesday, April 14, 2021 4:02:00 PM

EXTERNAL

Hi, Can I please get the link to tonights cannabis ordinance review?

I would like to provide feedback on the county's lack of forethought and diligence around neighborhood compatibility as far as aesthetics, safety, quality of life and property value impacts that industrial scale cannabis will have on residential neighborhoods. The costs are too high to bear on homeowners whose largest assets are the homes they live in. We have ample farmland available in the county much of which is not able to pass onto next generations - those ranch and larger properties have fewer neighbors and much more privacy where the impacts of cannabis will be well buffered, and will not put children at risk and exposure to crime. So many families will be constantly on high alert for armed thieves coming to rob crops and cash, or we will need to move to feel safer. Our property values will be decimated. I believe the county would be liable for a huge class action lawsuit by county residents who suffer significant property value decreases due to poor planning, lack of accountability and valuing homeowners assets. Please think this through!

thanks,

Brian Lamoreaux
415-269-3610
brian.lamoreaux@mac.com

On Mar 25, 2021, at 9:20 AM, Cannabis <Cannabis@sonoma-county.org> wrote:

Hello Brian,
Thank you for your email.
The project planner for that project (UPC19-0005) is Sou Garner. Her email address is sgarner@migcom.com. You may reach out directly to her for more information.

McCall Miller
Sonoma County Cannabis Program
County Administrator's Office
Cannabis@sonoma-county.org

From: Brian Lamoreaux <brian.lamoreaux@me.com>
Sent: Wednesday, March 24, 2021 10:10 AM
To: Cannabis <Cannabis@sonoma-county.org>
Subject: Re: questions about commenting on county cannabis ordinances/rules

EXTERNAL

Hi,

I would like to learn more about the cannabis operation permit application (address: 985/987 Pepper Rd. Petaluma), where the buildings are proposed, lighting, fencing, security, what part is open to the public, etc. I'm very curious to see if a lighting study is needed, as I know to grow year round they need lighting. Also curious about the water plans, I've just learned we are in the 3rd driest year on record right now and pumping large amounts of water directly adjacent to residential aquifer is a big concern, going against many sustainability efforts put fourth by the county.

As far as policy goes I am disappointed to see that most operations rely on year round-growing, i.e. lighting. We need to be saving energy instead of going in the opposite direction. The wine industry is completely fine with the natural cycles of spring, summer, fall and winter and is economically sustainable based on this. Why do the economics of cannabis (which sound like they will make more in \$ than wine, after not that long) rely on artificial lighting? Any why do ordinances allow for industrial operations to be located directly adjacent to residential neighborhoods? It feels like an affront to our basic rights to safety, privacy, and quality of life. Why is policy encouraging or forcing cannabis operations to be so large in nature (multiple 12,000 sq ft buildings are huge!) rather than smaller, more boutique scenarios? It seems like right now is the opportunity to get the policy right and allow for incremental step ups in project sizes, if the smaller initial ones are successful. Going big right away will lead to many mistakes that will be bore onto neighborhoods and residents. Meanwhile cannabis industry and county coffers will grow plump without much care.

Thanks for your consideration,

Brian Lamoreaux
415-269-3610
brian.lamoreaux@mac.com

On Mar 24, 2021, at 8:20 AM, Cannabis <Cannabis@sonoma-county.org> wrote:

Hello Brian,

Thank you for your email.

Please review the related documents on this [webpage](#). You may send comments regarding the cannabis ordinance to this email address.

With regards to a specific project, you may send those comments to the project planner. If you send me the exact address of the proposed

operation, I can look it up and send you the planner's contact information.

McCall Miller

Sonoma County Cannabis Program

County Administrator's Office

Cannabis@sonoma-county.org

From: Brian Lamoreaux <brian.lamoreaux@me.com>

Sent: Tuesday, March 23, 2021 9:12 PM

To: Cannabis <Cannabis@sonoma-county.org>

Subject: questions about commenting on county cannabis ordinances/rules

EXTERNAL

Hi,

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I just cannot believe the County would consider impacting residential neighborhoods in this way. It seems crazy to me! Obviously there is big \$\$ at work here.

Where can I express my feelings, opinions etc, in a way that they may help shape the rules/ordinances of how this all plays out? I would like to do so ASAP.

Thanks,

Brian Lamoreaux

415-269-3610

brian.lamoreaux@mac.com

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From: [Brian Lamoreaux](#)
To: [Cannabis](#)
Subject: Re: questions about commenting on county cannabis ordinances/rules
Date: Wednesday, April 14, 2021 4:31:56 PM

EXTERNAL

In addition to significant property value declines and the liability that this leaves the county exposed to I would like to add further feedback about faults in the review process.

In my experience the review/approval process for cannabis permits does not adequately address safety and security of the residential communities industrial cannabis operations. On a recent zoom call w/ District 2 Supervisor David Rabbitt and county planning officials regarding a permit application on Pepper Rd, Petaluma, on the subject of security and the overwhelming concerns that over 30 community members emphatically messaged, the only salient response from the County was that outdoor industrial cannabis operators/permit applicants needed to submit a security plan - which essentially illustrates the underlying flaw in the review system - that the idea of a security threat or risk is at the facility level, or that the only risk is assets getting stolen from the grow operation. Clearly the more significant risk and impact is born onto the community immediately surrounding the cannabis operation. Thieves will not be entering the front gate, they will come in via the sides or back of a site, where adjacent neighbors live, and they will be armed. Local examples of cannabis related crime can be found in recent history:

<https://www.pressdemocrat.com/article/news/neighbors-old-marijuana-farm-may-have-been-target-of-petaluma-home-invader/>

<https://www.marini.com/2018/03/14/petaluma-would-be-robbers-may-have-targeted-old-marijuana-farm/>

<https://www.petaluma360.com/article/news/police-log-november-25-december-1/>

It is not only actual crime that will impact residential communities but it is the potential for serious crime and the fear factors that will have a larger impact. Neighborhoods will not feel safe with cannabis growing in them, all visitors will be looked at in an unwelcome fashion, suspect of who they are and what they're doing. More people will buy guns to protect themselves. Every time a gunshot goes off, people will no longer think it's a farmer shooting at a coyote, they will wonder if something serious is going on. I really do not think I'm exaggerating here because I know I will be thinking this, when I once felt safe and tend to be quite skeptical of paranoid thoughts. This will be a new reality for thousands of people like my family who made a choice to live in a safe beautiful rural community, we now feel like we have to consider our options of relocating - but to where? I recently thought this would be our forever home. Neighborhoods will be torn apart just because the County lacks the foresight to consider these impacts and encourage cannabis on larger ag properties with fewer adjacent residences. Long standing locals who have lived here for decades to generations will get up and leave.

In urban contexts indoor cannabis grown indoors can have security systems and other features such as odor control. In outdoor settings these mitigations are not viable or practical. 8 ft

high fencing with nylon screening will do little to deter thieves.

Thank you,

Brian Lamoreaux
415-269-3610
brian.lamoreaux@mac.com

On Apr 14, 2021, at 4:01 PM, Brian Lamoreaux <brian.lamoreaux@me.com> wrote:

Hi, Can I please get the link to tonights cannabis ordinance review?

I would like to provide feedback on the county's lack of forethought and diligence around neighborhood compatibility as far as aesthetics, safety, quality of life and property value impacts that industrial scale cannabis will have on residential neighborhoods. The costs are too high to bear on homeowners whose largest assets are the homes they live in. We have ample farmland available in the county much of which is not able to pass onto next generations - those ranch and larger properties have fewer neighbors and much more privacy where the impacts of cannabis will be well buffered, and will not put children at risk and exposure to crime. So many families will be constantly on high alert for armed thieves coming to rob crops and cash, or we will need to move to feel safer. Our property values will be decimated. I believe the county would be liable for a huge class action lawsuit by county residents who suffer significant property value decreases due to poor planning, lack of accountability and valuing homeowners assets. Please think this through!

thanks,

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415-269-3610
brian.lamoreaux@mac.com

On Mar 25, 2021, at 9:20 AM, Cannabis <Cannabis@sonoma-county.org> wrote:

Hello Brian,
Thank you for your email.
The project planner for that project (UPC19-0005) is Sou Garner. Her

email address is sgarner@migcom.com. You may reach out directly to her for more information.

McCall Miller

Sonoma County Cannabis Program

County Administrator's Office

Cannabis@sonoma-county.org

From: Brian Lamoreaux <brian.lamoreaux@me.com>

Sent: Wednesday, March 24, 2021 10:10 AM

To: Cannabis <Cannabis@sonoma-county.org>

Subject: Re: questions about commenting on county cannabis ordinances/rules

EXTERNAL

Hi,

I would like to learn more about the cannabis operation permit application (address: 985/987 Pepper Rd. Petaluma), where the buildings are proposed, lighting, fencing, security, what part is open to the public, etc. I'm very curious to see if a lighting study is needed, as I know to grow year round they need lighting. Also curious about the water plans, I've just learned we are in the 3rd driest year on record right now and pumping large amounts of water directly adjacent to residential aquifer is a big concern, going against many sustainability efforts put fourth by the county.

As far as policy goes I am disappointed to see that most operations rely on year round-growing, i.e. lighting. We need to be saving energy instead of going in the opposite direction. The wine industry is completely fine with the natural cycles of spring, summer, fall and winter and is economically sustainable based on this. Why do the economics of cannabis (which sound like they will make more in \$ than wine, after not that long) rely on artificial lighting? Any why do ordinances allow for industrial operations to be located directly adjacent to residential neighborhoods? It feels like an affront to our basic rights to safety, privacy, and quality of life. Why is policy encouraging or forcing cannabis operations to be so large in nature (multiple 12,000 sq ft buildings are huge!) rather than smaller, more boutique scenarios? It seems like right now is the opportunity to get the policy right and allow for incremental step ups in project sizes, if the smaller initial ones are successful. Going big right away will lead to many mistakes that will be bore onto neighborhoods and residents. Meanwhile cannabis industry and county coffers will grow plump without much care.

Thanks for your consideration,

Brian Lamoreaux
415-269-3610
brian.lamoreaux@mac.com

On Mar 24, 2021, at 8:20 AM, Cannabis
<Cannabis@sonoma-county.org> wrote:

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With regards to a specific project, you may send those comments to the project planner. If you send me the exact address of the proposed operation, I can look it up and send you the planner's contact information.

McCall Miller

Sonoma County Cannabis Program
County Administrator's Office
Cannabis@sonoma-county.org

From: Brian Lamoreaux <brian.lamoreaux@me.com>
Sent: Tuesday, March 23, 2021 9:12 PM
To: Cannabis <Cannabis@sonoma-county.org>
Subject: questions about commenting on county cannabis ordinances/rules

EXTERNAL

Hi,

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down from our mailboxes, where we walk everyday and will impact all of the kids who live here, including mine. We bought our home here 3 years ago feeling like we may never move but it's now causing us to have to rethink all of this.

I just cannot believe the County would consider impacting residential neighborhoods in this way. It seems crazy to me! Obviously there is big \$\$ at work here.

Where can I express my feelings, opinions etc, in a way that they may help shape the rules/ordinances of how this all plays out?
I would like to do so ASAP.

Thanks,

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From: [Brian Lamoreaux](#)
To: [Cannabis](#)
Subject: Re: questions about commenting on county cannabis ordinances/rules
Date: Wednesday, April 14, 2021 5:09:16 PM

EXTERNAL

Thank you - can you pls LMK what the status is of the ordinance updates? Is it already into effect? or approved and just need signatures by supervisors?

What is our recourse as concerned citizens/homeowners, for trying to have cannabis limited to larger ag/ranch properties w/ lesser impacts onto residential neighborhoods?

will the comments I've emailed you today be entered into the record?

Thanks,

Brian Lamoreaux
415-269-3610
brian.lamoreaux@mac.com

On Apr 14, 2021, at 5:04 PM, Cannabis <Cannabis@sonoma-county.org> wrote:

Hello Brian,

The Planning Commission Continued Meeting is not tonight; it is tomorrow night at 6:00 PM. Visit <https://sonomacounty.ca.gov/Cannabis/Legislative-Updates/County-Ordinances/> for more information.

McCall Miller

Sonoma County Cannabis Program
County Administrator's Office
Cannabis@sonoma-county.org

From: Brian Lamoreaux <brian.lamoreaux@me.com>
Sent: Wednesday, April 14, 2021 4:02 PM
To: Cannabis <Cannabis@sonoma-county.org>
Subject: Re: questions about commenting on county cannabis ordinances/rules

EXTERNAL

Hi, Can I please get the link to tonight's cannabis ordinance review?

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property value impacts that industrial scale cannabis will have on residential neighborhoods. The costs are too high to bear on homeowners whose largest assets are the homes they live in. We have ample farmland available in the county much of which is not able to pass onto next generations - those ranch and larger properties have fewer neighbors and much more privacy where the impacts of cannabis will be well buffered, and will not put children at risk and exposure to crime. So many families will be constantly on high alert for armed thieves coming to rob crops and cash, or we will need to move to feel safer. Our property values will be decimated. I believe the county would be liable for a huge class action lawsuit by county residents who suffer significant property value decreases due to poor planning, lack of accountability and valuing homeowners assets. Please think this through!

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Sonoma County Cannabis Program
County Administrator's Office
Cannabis@sonoma-county.org

From: Brian Lamoreaux <brian.lamoreaux@me.com>
Sent: Wednesday, March 24, 2021 10:10 AM
To: Cannabis <Cannabis@sonoma-county.org>
Subject: Re: questions about commenting on county cannabis ordinances/rules

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brian.lamoreaux@mac.com

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McCall Miller

Sonoma County Cannabis Program
County Administrator's Office
Cannabis@sonoma-county.org

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Sent: Tuesday, March 23, 2021 9:12 PM

To: Cannabis <Cannabis@sonoma-county.org>

Subject: questions about commenting on county cannabis ordinances/rules

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I would like to do so ASAP.

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Brian Lamoreaux
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brian.lamoreaux@mac.com

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From: [Jennifer Klein](#)
To: "[Deborah Eppstein](#)"
Cc: [Robert Pittman](#); [Cannabis](#)
Subject: RE: Revised Cannabis Chapters 38 and 26
Date: Wednesday, April 14, 2021 1:33:37 PM

Deborah –

Thank you for your question. Right now, the comment period is closed. The Planning Commission may decide whether there is a basis to reopen it tomorrow at its continued meeting on the cannabis ordinance update.

Best regards,
Jennifer

Jennifer C. Klein, Chief Deputy
Office of the County Counsel
575 Administration Drive, 105A
Santa Rosa, CA 95403
Tel. 707.565.2421
Dir. 707.565.6007
Fax 707.565.2624

From: Deborah Eppstein <deppstein@gmail.com>
Sent: Wednesday, April 14, 2021 1:26 PM
To: Jennifer Klein <Jennifer.Klein@sonoma-county.org>
Cc: Robert Pittman <Robert.Pittman@sonoma-county.org>
Subject: Re: Revised Cannabis Chapters 38 and 26

EXTERNAL

Hi Jennifer,

Are you able to confirm if the public comment period is open on the new chapter 38, and the revisions to chapter 26? As the Planning Commission is meeting tomorrow evening, this timing is very important now.

Thanks,
Deborah

On Apr 12, 2021, at 3:08 PM, Deborah Eppstein <deppstein@gmail.com> wrote:

Dear Jennifer,

I have seen the revised draft of Chapter 38, and chapter 26, published last week. As there have been several substantive changes in Chapter 38, is there another 30 day public comment period?

For Chapter 26, there also are many substantive changes. Is there a 30 day public comment period for this also, and a date for its public hearing?

Thank you for these clarifications.

Best regards,
Deborah Eppstein

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From: [Chelsea Holup](#) on behalf of [PlanningAgency](#)
To: [Cannabis](#)
Subject: FW: No on revised cannabis ordinance public comment for April 15 meeting.
Date: Thursday, April 15, 2021 8:41:11 AM

From: Dan McCoy <danmccoy74@yahoo.com>
Sent: April 14, 2021 10:14 AM
To: PlanningAgency <PlanningAgency@sonoma-county.org>
Subject: No on revised cannabis ordinance public comment for April 15 meeting.

EXTERNAL

Hello,

My awakening to the existential threat big cannabis poses to the Sonoma County we all know and love began when I learned that an industrial cannabis grow and processing facility was applying to be permitted near my home on Pepper Road. Since that time I have researched the nefarious tentacles that cannabis money has wrapped around county governance. High priced public relation firms and industry advocates have pushed the drafting of this ordinance and behind the superficial environmental protections is a document that is a complete capitulation to these forces. One such firm 421 group employs Lynda Hopkins former campaign strategist Herman G. Hernandez. Various other Supervisors and county officials are affiliated with a network of these industry lobbyists. I ask that prior to any vote on this revised ordinance that each county official who has a vote in recommending or approving this ordinance publicly state and disclose each individual and entity affiliated with the cannabis industry who has contributed to their campaign in any way or with whom they have a personal relationship. Let those who are conflicted in this way recuse themselves from this process.

The grows that are planned if this ordinance "revision" passes will become a blight on the quality of life for our rural residential neighborhoods which so many of us have fought, saved, and suffered to achieve, some of us for generations. These are not the local small farm grows that many of us have come to respect but rather out of county big business that have made it clear they have no intention of working with or respecting the neighborhoods near these grows. In fact it has become clear that the opposite is true. In my few interactions with the forces who are pushing this ordinance it is clear that they hold the current rural residents in nothing but contempt and slander us as NIMBY and whatever else they can think of so that they cash in. We love our neighbors, our children, and our homes and for that we are derided. That should tell you everything you need to know about who these forces truly are under their thin veneer. Unfortunately many government officials have been sucked into the promises of big money and the slick presentations of these shysters and are on the precipice of selling out their own community and changing the character of this county that we all love into to a disney land of excess for the ultra rich and bourgeoisie while the rest of us endure the loss of the quality of life that we currently enjoy. The protections in the proposed ordinance will never be sufficiently enforced and the slippery slope of caving to this industry will be an ever easing of the minimal protections included in this ordinance. Now is the time to say no. Small individual grows are manageable, sustainable, and prevent a new corporate interest from taking control of this county and abusing its residents for their profits. Each grow should be reviewed and permitted on a case by case basis with community compatibility as a key factor. No on the revised ordinance. Thank you.

Daniel McCoy

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From: [Scott Orr](#)
To: [Cannabis](#)
Subject: FW: Planning Commissioners dismissiveness towards community
Date: Thursday, April 15, 2021 8:29:29 AM

From: Greg Carr <greg99pole@gmail.com>
Sent: Wednesday, April 14, 2021 4:13 PM
To: Scott Orr <Scott.Orr@sonoma-county.org>
Subject: Fwd: Planning Commissioners dismissiveness towards community

EXTERNAL

----- Forwarded message -----

From: **Moira Jacobs** <moiraajacobs@comcast.net>
Date: Wed, Apr 14, 2021 at 3:32 PM
Subject: Planning Commissioners dismissiveness towards community
To: Greg Carr <greg99pole@gmail.com>, Susan Gorin <Susan.Gorin@sonoma-county.org>
Cc: <PlanningAgency@sonoma-county.org>, district4 <district4@sonoma-county.org>, <district3@sonoma-county.org>, Lynda Hopkins <Lynda.Hopkins@sonoma-county.org>, David Rabbitt <David.Rabbitt@sonoma-county.org>

Dear Commissioner Carr, and Supervisor Gorin,

I attended the March 18th and 25th planning commission hearings regarding the marijuana ordinance. I noted how incredibly dismissive you continue to be of all citizen input opposed to your promotion of large commercial pot operations throughout Sonoma County rural residential areas.

There is so much wrong with the County marijuana ordinance and policy it's hard to know where to begin. For starters, the intense and non-stop conflict your policy has caused since 2016 is proof enough you need to go back to the drawing board and rethink all your flawed assumptions.

For starters, your assumption that marijuana tax revenues will save Sonoma County from its fiscal problems needs a major readjustment. Economic analyses do not warrant this major bet and destruction of our lands. The social, crime and environmental costs alone will far out weigh the tax revenues. Check out latest reports on estimated supply and demand metrics for pot.

The fever dreams of thinking 70% of Americans will be regular THC users is more likely going to sit under 10% and closer to the current less than 5%. Why? Because most Americans are smart enough not to want to fry their brain and other vital organs. If pot is legalized nationally, the supply will come from far cheaper water rich land than Sonoma County, if not ultimately synthetic producers.

Your assumption that the low skilled “trimming” and “hauling” jobs created will somehow be good for our county (or workers) also needs a major readjustment. Your completely ignoring the massive traffic and road impacts, and environmental impacts, all need serious and comprehensive readjustments. The future “career trajectory” for marijuana trimmers, packers and haulers is not upward mobility. Moreover, you still must study the full impact of THC, now on CA Prop 65 list of toxic substances, on both workers and consumers. Do you know the impact of continuous exposure to toxic THC as part of the exposure to workers and during the manufacturing process?

The January 2020 addition of THC to State of CA Prop 65 toxins list was an event that must trigger a full EIR per CEQA for this entire program. Check it out, it’s the law!

I can provide you a far more successful economic development program in 5 minutes on a napkin than this ongoing train wreck. My program would not include dependency on and promotion of unhealthy drugs or low skilled jobs. Your over reliance on some mythical marijuana bonanza is such a bad idea for economic development!

During the two March hearings Commissioner Carr talked to some of us who oppose your policy in a very dismissive and disrespectful manner. I recall your going on about how some “hippie” you knew (your word, not mine) would have liked to see all this promotion of the drug. Just because you may value the “hippie” lifestyle, which you seemed to suggest included regular use of THC, this has no place in crafting new public policy that impacts all of Sonoma County lands and many thousands of residents living here. Your comments also revealed your biased view of being partial to the marijuana operators.

Also, you used the term “reefer madness” sarcastically in a sentence suggesting some of us opposing your policy views were holding onto incorrect or out dated views about marijuana. You even laughed disrespectfully at our concerns. This was another example of your dismissiveness towards the many thousands of residents opposed to your environmentally destructive and ill conceived policy. It was also very unprofessional.

The biggest mistake Sonoma County supervisors and planning commissioners made in this reckless policy was assuming Prop 64 gave you some blank check to do whatever you wanted, residents be damned. You also quickly and impulsively promised too much to marijuana operators, suggesting you’d proceed quickly with a “go big” on marijuana program. Early on you set expectations way too HIGH for the drug producers, that was a big mistake.

Further, this is still a highly speculative crap shoot - anyone investing in a marijuana operation is entering into a highly speculative gamble, this includes the operators and the County government. We the taxpayers and voters should not pay one penny to help bail out this failure of a program. You should cut your losses now.

I was there to witness one of the earliest CAG meetings (“Canabis Advisory Group”). That entire process was outrageous in its disregard of residents and corrupt in its deliberations.

The entire ordinance creation process here has been unrealistic and irresponsible from the start.

Susan Gorin wrote to me back in 2017 stating that since we had legalized pot, “now we need

to let them grow it.” That did not mean allowing this County to embark on a very aggressive marijuana industry promotion program and deciding it would be a key economic development plan without any input from the voters. There was ZERO voter mandate for the first ordinance let alone this current outrageous “second phase” ordinance.

Proposition 64 did not give this County the authority to proceed with this program. You are proceeding against the wishes of the majority of residents, and in ongoing violation of CEQA.

Here’s a review on Proposition 64:

Prop 64 clearly stated any person could grow up to 6 plants for personal use, and no more. It also allowed for following:

“Counties and municipalities were empowered to restrict where marijuana businesses could be located. Local governments were also allowed to completely ban the marijuana establishments from their jurisdictions. Moreover, local jurisdictions were allowed by the measure to "reasonably regulate" the personal growth, possession, and use of marijuana plants allowed by Prop. 64.” ref: ballotpedia.

This County continues to ignore the fact that **Prop 64 gave ZERO voter mandate for such a massive and aggressive push for marijuana light industrial operations all over Sonoma County.** While 59% voted yes on Prop 64 in Sonoma County, 41% voted No. Moreover, of the 59% that voted yes, the vast majority of those Yes voters only approved the decriminalization of personal marijuana use, not a County approval of a massive number of large commercial marijuana operations throughout County lands. Most notably, in a 2018 Press Democrat poll, over 70% of Sonoma County citizens stated they did not want such operations “anywhere near them.”

The second major failing by this County was its corruptly weaseling out of doing a full EIR per CEQA requirements back in 2016. You can’t proceed with phase two ordinance until you conduct a full EIR, this has been clearly explained by various law firms now representing the many thousands of residents who have been outraged by your many negligent and destructive actions since 2016.

It’s notable how Napa and Marin County supervisors have continued to listen to and respect their voters’ wishes and have voted not to allow large scale commercial marijuana facilities there.

What is different in Sonoma County? 1) there is an abject disrespect for the citizen input here, and 2) the County is in collusion with the marijuana industry. I have proof of both, and the evidence is growing. We can build another case on this.

The next step from the many citizen organizations now activated and unified against this destructive policy will be lodging formal complaints with various State of California agencies.

Until you start listening respectfully to your constituents on this, the conflicts and your policy failures will continue.

Sincerely,
Moira Jacobs

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From: EaaAtKRQ2xUnXmbg@protonmail.com
To: [Cannabis](#)
Subject: apologies: I didn't catch where deputy director Orr said where this should be addressed at the beginning of the 4/15/21 meeting...
Date: Thursday, April 15, 2021 7:45:58 PM

EXTERNAL

The 1-Acre limit for hoop houses was imposed after the public was no longer able to comment; it was also made using any scientific reasoning... rather, it was based on purely-subjective notions of aesthetics by a couple commissioners.

I completely understand the desire to not desire seeing hoop houses within scenic corridors, residential (which isn't allowed anyway) zones, or within community separators.

My contention is that within Agricultural zones, such a limit does not make any sense.

Hoop houses, and similar temporary structures and coverings serve multiple purposes which provide multiple benefits.

I'll be using the term hoop house as a general term, as that is how it's been used in county planning deliberations.

Cold, humid conditions are the perfect conditions for mold/fungi growth. In Sonoma County, temperatures can dip into the 40°s F at night during the growing season. Simple coverings, which can include hoop houses, permit plants to stay warmer, which reduces intra-cellular damage. At best, cold temperatures slows growth in plants; at worst... Cold Kills Plants.

Hoop houses also reduce the need to apply xenobiotic chemical compounds which are commonly used by in other agricultural applications to treat pests.

Hoop houses diffuse the light which reaches the canopy, limiting over-saturation and light bleaching, which degrade plants' overall quality by inhibiting the photosynthetic process.

Temporary structures also reduce the amount of direct solar radiation on the plants, which allows the plant to use less water, through the process of transpiration in order to cool itself from heat stress.

Hoop houses are used across agriculture. Outdoor cannabis cultivators already have to compete against indoor-grown cannabis; outdoor goes for 1/3 of what indoor goes for, and indoor growers can have as many as 6 harvests per year, compared to 1 by outdoor licensees.

As any reasonable person can see, they are not solely used for season extension.

They can limit the potential compounding effects of abiotic stress on growth and value of plants/flowers... abiotic stress hinders efficient development of plants and lowers the quality of cannabis' inflorescence, which lowers the value for cultivators.

Some commissioners stated that Chapter 38 could help smaller cultivators by providing a way for them to pool their resources and grow on the same parcel. Well, if more than one cultivator is located on the same parcel, which one is able to use a hoop house, and which one isn't?

In summation, the desire to limit hoop houses within scenic corridors and community separators is understandable... but imposing the same abstract limit upon cooperative farmers operating within agricultural zones makes no sense. To quote one Sonoma County's commissioner: "Cannabis is much more like an agricultural crop, than it is not."

Thank You

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From: [Chelsea Holup](#) on behalf of [PlanningAgency](#)
To: [Cannabis](#)
Subject: FW: Cannabis expansion public comment
Date: Thursday, April 15, 2021 2:26:22 PM

From: Janice Moghtaderi <jjturtledove@yahoo.com>
Sent: April 15, 2021 9:54 AM
To: PlanningAgency <PlanningAgency@sonoma-county.org>
Subject: Cannabis expansion public comment

EXTERNAL

Hello,

I am raising my children in this county because of its beauty and opportunities. Amending Chapter 26 and adding Chapter 38 will destroy our resources and natural beauty. Heavy water consumption is frowned upon, and yet it seems when making money is involved, that is overlooked. We cannot burn fires on certain days because of air quality, but you want to add a noxious stench to the air all over the county. I have had dozens of friends move their families out of state because of cost of living, and this will drive prices up even higher. It appears that this county only cares about money. Bring in the wineries, casinos and pot growers. It creates revenue. The families who live here (but not for long) just have to accept it or leave. This land was so beautiful once. Please don't tax our water supply and pollute the air with the horrific stench of weed.

-Janice Moghtaderi

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From: [Marcie Woychik](#)
To: [Cannabis](#)
Subject: FW: Cannabis Odor Management
Date: Thursday, April 15, 2021 5:07:51 PM
Attachments: [image001.png](#)

Kind regards,

Marcie Woychik
Chief Deputy Clerk of the Board
County of Sonoma, Board of Supervisors



From: Mark Kram [mailto:mark.kram@groundswelltech.com]
Sent: Thursday, April 15, 2021 4:13 PM
To: Pat Gilardi <Pat.Gilardi@sonoma-county.org>; Andrea Krout <Andrea.Krout@sonoma-county.org>; district3 <district3@sonoma-county.org>; Jenny Chamberlain <jchamber@sonoma-county.org>; district5 <district5@sonoma-county.org>
Cc: Marcie Woychik <Marcie.Woychik@sonoma-county.org>; blayne <blayne@hartmaneg.com>; Cliff Frescura <cliff.frescura@groundswelltech.com>
Subject: Cannabis Odor Management

EXTERNAL

Greetings Members of the Sonoma County Board of Supervisors,

My name is Dr. Mark Kram and I am the Chief Scientist for Groundswell Technologies. We specialize in automated real-time monitoring and response through an Internet of Things platform. The purpose of this note is to briefly describe a technology my colleagues and I have developed and deployed to help agencies, communities and growers manage and mitigate cannabis odor challenges. We've successfully deployed our technology at many operations in Santa Barbara County and were told by policy leaders that there could be interest in your region.

Through a partnership with Dr. Blayne Hartman, we developed VaporSafe[®], which combines laboratory grade analytical instrumentation, continuous chemical and weather monitoring and mapping, and an intuitive web dashboard that allows folks to quickly answer the following questions:

1. Are cannabis odor mitigation efforts optimized and meeting specific criteria?
2. Are cannabis vapor concentrations above nuisance levels at specific locations?

3. What are the conditions that would result in a nuisance within the neighboring community?
4. Are permit requirements being met?
5. Which operation is resulting in unacceptable emissions?
6. Are cannabis operations impacting winery operations?

There is much more to this. For instance, we can help growers save energy and reduce consumables through automated optimization based on continuous monitoring results. In addition, we have helped parties resolve legal disputes using empirical evidence and our approach has been incorporated into settlement requirements.

We would very much like to present to you, to learn more about the local and regional players, and to answer questions you might have for us.

Kindest Regards,

Mark

Mark Kram, Ph.D., CGWP*
Groundswell Technologies, Inc.
7127 Hollister Ave., Suite 25A-108
Goleta, CA 93117 USA
805-899-8142 (office)
805-844-6854 (cell)
mark.kram@groundswelltech.com
www.groundswelltech.com

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Providers of VaporSafe® VI assessment, monitoring and response services (<https://vaporsafe.io>;
<https://vaporsafe.io/solutions-blog/>; <https://vaporsafe.io/faqs/>)



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From: [Brian Lamoreaux](#)
To: [David Rabbitt; Cannabis; sgarner@migcom.com](#)
Cc: [Pepper Neighbors](#)
Subject: Fwd: Sonoma County Cannabis Updates
Date: Friday, April 16, 2021 12:03:35 PM
Attachments: [ORD20-0005 PC Resolution No. 21-01 04-15-2021.pdf](#)

EXTERNAL

Hi,

Can you please tell me if the adopted resolution last night means that currently submitted cannabis operation permits, such as the one on Pepper Rd. Petaluma are now reviewed/approved by only the Ag Commissioner? Or does it still go before the Board of Zoning Adjustments, as previously described? Would the applicant (DEO Farms) have to cancel their permit application and then reapply to get the fast-track/ministerial review process? The process is not very easy to understand.

Thank you,
Brian Lamoreaux

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Begin forwarded message:

From: "Sonoma County, CA" <casonoma@public.govdelivery.com>
Subject: Sonoma County Cannabis Updates
Date: April 16, 2021 at 9:39:54 AM PDT
To: brian.lamoreaux@mac.com
Reply-To: casonoma@public.govdelivery.com

Sonoma County Cannabis Program



You are receiving this email because you are subscribed to Sonoma County Cannabis Updates.

This email is to inform you that the following items are available on the Cannabis Program County Ordinances webpage located [here](#):

- Planning Commission Resolution No. 21-01 Adopted 04-15-2021
- Zoom Video Recording of 04-15-2021 Meeting

For more information, visit sonomacounty.ca.gov/Cannabis.



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From: [Nancy and Brantly Richardson](#)
To: [Cannabis](#); [Christina Rivera](#); [McCall Miller](#)
Cc: [BOS](#)
Subject: PLANNING COMMISSIONER'S RECOMMENDED CHANGES ON MARCH 25 COMPARED WITH STAFF'S RED-LINED RESULT
Date: Friday, April 16, 2021 4:32:49 PM

EXTERNAL

FOR THE RECORD

Analysis prepared by members of the Neighborhood Coalition.
Unfortunate the hearing on 4/15 was not reopened for public comments.
Nancy Richardson

-

Comparison – PC Straw Votes on March 25 vs Staff Redline Version on April 8

Issue 1: Consistency with General Plan 2020 – cannabis cultivation “tertiary and incidental” to agricultural crops

GP 2020: Policy AR-4a: The primary use of any parcel within the three agricultural land use categories shall be agricultural production and related processing, support services, and visitor serving uses. Residential uses in these areas shall recognize that the primary use of the land may create traffic and agricultural nuisance situations, such as flies, noise, odors, and spraying of chemicals.*

GP AR – Visitor Serving Uses and Events – Secondary and Incidental to Agricultural uses – Limited in Scale and Intensity – to be regulated in Chapter 26

Policy AR-6a: Permit visitor serving uses in agricultural categories that promote agricultural production in the County, such as tasting rooms, sales and promotion of products grown or processed in the County, educational activities and tours, incidental sales of items related to local area agricultural products, and promotional events that support and are secondary and incidental to local agricultural production.

Policy AR-6g: Define in the Development Code compatible visitor serving uses such as tasting rooms, sales and promotion of products grown or processed in the County, educational activities and tours, incidental sales of items related to local area agricultural products, and promotional events which support and are incidental to local agricultural production, and define their permissible sizes and intensities. *

Issue 2: Did not incorporate more stringent State Standards

CDFW 3/18/21 Letter Page 11: “Section 26-25-040...these setbacks are not consistent

with state requirements. For instance, Section 26-65-040 has a minimum standard of a 25-foot setback to riparian areas. The SWRCB Cannabis Policy has a standard of 50-foot minimum buffer for ephemeral watercourses.”

Riparian Setbacks Chapter 26-65-040 –cultivation Setbacks- No Changes Made

Agricultural cultivation and related access roads, drainage, planting, seeding, fertilizing, weeding, tree trimming, irrigation, and harvesting that do not involve the removal of existing contiguous riparian vegetation within two hundred feet (200') of the top of the higher bank, and are located as follows:

- a. No closer than one hundred feet (100') from the top of the higher bank in the 200-foot riparian corridor for the Russian River; **SWRCB: perennial watercourses = 150 feet**
- b. No closer than fifty feet (50') from the top of the higher bank in the 100-foot riparian corridors designated in the General Plan and the upland areas of the 50-foot riparian corridors; or
- c. No closer than **twenty-five feet (25')** from the top of the higher bank in all other riparian corridors **SWRCB: 100 feet intermittent water courses – all other ephemeral 50 feet.**

NCRWQCB: 3/18/21 Letter: Page 4: Discharge of excess irrigation water, effluent, process water or gray water is considered industrial wastewater and cannot be discharged to septic or land via a bio-retention treatment system. And obtaining a permit for such is “unlikely.”

“As such, the Regional Water Board requests the County revise the requirements of the wastewater management plan (Sec. 38.12.130) to acknowledge that the discharge of cannabis cultivation wastewater to septic (or similar) systems is generally prohibited unless an appropriate waste discharge permit is sought from the Regional Water Board....Since the adoption of the original Cannabis Policy and General Order in 2017, the Regional Water Board has yet to approve a request for such a permit.”

Section 38.12.130: Wastewater and Run Off – No changes made

Include verification of compliance with or waiver from the waste discharge requirements of the state water resource control board;

Direct excess irrigation water or effluent to a sanitary sewer, septic, irrigation, graywater or bio-retention treatment system;

If discharging excess irrigation to a septic system, include a system capacity evaluation by a qualified sanitary engineer that demonstrates the system has adequate capacity;

Issue 3: Staff Re-interpreted Planning Commissioner requested changes – often less protective or silent on whether allowed under ministerial permits

Chapter 38 “as is” with Staff flexibility and PC straw votes for policy changes

March 25 PC Request	April Red-line Documents
<p>Removal of General Plan Cannabis as a Crop – no “Right to Farm” protections</p> <p>Belforte raised pesticide drift concern/</p>	<p>New Language to protect grape growers: 38.06.030 B: The permit application must also include a signed declaration acknowledging that agricultural operations on neighboring properties may employ</p>

<p>Mauritson agreed: Orr stated they'd write a notification</p>	<p>farming practices that have the potential to be detrimental to cannabis cultivation.</p>
<p>Epstein letter showing cumulative allowances over 10%... Davis requests maximum of 5 acres for hoop houses... any more than that is too much coverage of land.</p> <p>Staff did opposite – just changed cultivation site to a flat 10%... Appears to favor large projects – unclear whether the limits in B on New and Expanded Permanent Structures remains or a mistake</p>	<p>Changed to a flat 10% cultivation site: Sec. 38.12.030. – Limitation on Canopy and Structures: Cannabis Cultivation Site and Canopy Limits. The cannabis cultivation site is limited to ten percent (10%) or less of the parcel. Canopy associated with specific cultivation types, including outdoor cultivation, hoop house cultivation, and indoor and mixed light cultivation in existing or new or expanded permanent structures, is not otherwise specifically limited</p> <p>B: Limit on New or Expanded Permanent Structures. UNCHANGED</p> <p>Up to 20 acres = 1 acre vs Over 20 acres 50% of maximum lot coverage per Chapter 26</p>
<p>March 25 PC Request</p>	<p>April Red-line Documents</p>
<p>Setbacks Straw Vote: Carr/Davis/Belforte Chapter 38 ONLY change setback from cultivation to property line to 400 feet</p> <p>Change from cultivation to residential structure to 600 feet if it's in a RESIDENTIAL Zone</p> <ol style="list-style-type: none"> 1. Not CHANGED 2. Change lower than 600 feet requested and lower than 500 feet for penned animals <p>Setbacks – Not in Scenic Corridor (Mauritson)</p>	<p>Sec. 38.12.040. – Setbacks</p> <ol style="list-style-type: none"> 1. Property line = 100 feet 2. Neighboring structures = 300 feet 3. Residential zoning districts: not 600 feet 4. Sensitive uses – removed Class 1 bikeways <p>New Language 3: Residential zoning districts. Outdoor and hoop house cultivation must be set back a minimum of 400 feet from a property line that abuts a parcel with a residential zoning designation under Chapter 26 (AR, RR, R1, R2, R3). Distance is measured in a straight line from the nearest point of canopy to the nearest point of the adjoining residential property line.</p> <p>New Language 5: 5. Scenic corridor. Hoop house cultivation is not allowed within a scenic corridor setback, Section 26-64-030.</p>
<p>Carr/ Davis: No tree removal for cannabis Mauritson – only if to avoid fire danger</p>	<p>Sec. 38.12.060. - Tree, Timberland, and Farmland Protection.</p>

<p>Defaulted to report by arborist – disease, hazard or defensible space</p>	<p>New language: Removal Prohibited. No tree can be removed to accommodate the cannabis cultivation site unless a report by a certified arborist or registered professional forester is submitted concluding one of the following: 1) the tree is dead or likely to promote the spread of insects or disease; 2) the tree poses a potential hazard to life or property; or 3) tree removal is necessary to maintain defensible space around an existing permanent structure.</p>
<p>March 25 PC Request</p>	<p>April Red-line Documents</p>
<p>Carr – Request: new structures require 1:1 replacement</p> <p>Staff: changed crop replacement with no removal of crops for structures – and added impervious surfaces – cannabis roads, parking areas, etc.</p> <p>CDFA: recommended 2:1 replacement of displaced crops on prime lands</p>	<p>Sec. 38.12.060. - Tree, Timberland, and Farmland Protection.</p> <p>New Language – Previously Developed Areas. New and expanded permanent structures and impervious surfaces within the cannabis cultivation site must be sited within previously developed areas. “Previously developed areas” includes areas covered by structures, pavement, decks less than 30 inches in height, and heavily trafficked and highly compacted areas such as unpaved parking lots and driveways. “Impervious surface” means a surface that will be compacted or covered with a layer of impervious material so that it is completely or highly resistant to infiltration by water, including streets, sidewalks, and parking lots.</p>
<p>Issue: Consistency with General Plan Appears that cannabis cultivation parcels will also need to grow larger acreages of real crops than the land devoted to cannabis cultivation</p>	<p>New Language: Agricultural Production. An application for a cannabis cultivation site that is located within an agricultural zone (LIA, LEA, DA) must be consistent with General Plan Policy AR-4a, in that the primary use of the parcel shall be agricultural production and related processing, support services, and visitor serving uses.</p>
<p>Orr/Rincon stated that the CDFW review of biotic resources is only through CUP process</p>	<p>Sec. 38.12.070. – Protection of Biotic Resources.</p>

<p>– not ministerial</p> <p>Did NOT add the State standard to Chapter 26 setbacks for Riparian Corridors</p>	<p>New Language: Riparian Corridor Setbacks. New permanent structures must be located outside the Riparian Corridor Steam Conservation Area, Section 25-65. Outdoor and hoop house cultivation canopy must conform to the agricultural setback set forth in Section 26-65- 040.</p> <p>See RIPARIAN RESOURCES Page 1</p>
<p>March 25 PC Request</p> <p>Straw Vote: add criteria of 75% coverage within a timeframe – Implemented</p> <p>Orr warned that such criteria are “butting up against the limits of ministerial” Carr agreed – these are discretionary decisions</p>	<p>April Red-line Documents</p> <p>Sec. 38.12.010. –Design, Lighting, Security and Screening</p> <p>D. Fencing and Screening. Fencing that is visible from a public right of way or Class 1 Bikeway must be screened. Applicant must demonstrate that 75% of the fence will be screened within 5 years from the date of permit approval. Vegetative screening can only include non-invasive fire-resistant vegetation.</p>
<p>Protected Ridgetops from all forms of cultivation – changed from 50 to 30 feet</p>	<p>Sec. 38.12.090. – Slope and Grading Limitations. A Cannabis cultivation site shall be set back a minimum of fifty (50) feet from the delineated slope break of descending existing slopes greater than thirty (30) percent for more than thirty (30) feet in slope length.</p>
<p>REMOVED LANGUAGE ABOUT CONTROLLING ODOR Odor shall be controlled in a way that prevents cannabis odor from being detected off of the parcel containing the cannabis cultivation site</p> <p>Carr – clarified that cultivation odor standard does not apply to outdoor – overrode Klein statement. Reed – said small parcels will need to grow indoors</p>	<p>Sec. 38.12.110. - Air Quality, Odor, Noise, Occupational Safety.</p> <p>New Language: B: Filtration and Ventilation: Cannabis odor from a permanent structure must not be detectable offsite.</p>
<p>Did NOT address wastewater issue – See Page 2 above</p>	<p>Sec. 38.12.120. Waste Management. Storage, reuse, and disposal plan for plastic sheeting or similar materials used to cover hoop houses.</p>

<p>Added Hoop house plastic disposal</p>	
<p>March 25 PC Request</p> <p>Appears that all protections for zones 1 and 2 are removed</p> <p>If the groundwater well is within 500 feet of a blue-line stream, then documentation of one of the following:</p> <p>1) A net zero water plan prepared by a qualified professional demonstrating and concluding that the proposed use would not result in a net increase in onsite groundwater use;</p> <p>2) The groundwater well is within 500 feet of the Russian River or Dry Creek; or</p>	<p>April Red-line Documents</p> <p>Sec.38.12.140. Water Use.</p> <p>Groundwater Availability Zones 1 and 2. Documentation that the well serving the cannabis cultivation site is located in Groundwater Availability Zone 1 or 2, and not within a Priority Groundwater Basin.</p>
<p>“Priority Groundwater Basin” means a medium, high or very high priority groundwater basin, as identified by the California Department of Water Resources in California’s Groundwater (Bulletin 118), or other groundwater basin for which a Groundwater Sustainability Agency has formed.”</p> <p>Example: Santa Rosa Plain, Petaluma, others? _____</p>	<p>Priority Groundwater Basin. If the groundwater well is within a Priority Groundwater Basin, then provide one of the following:</p> <p>1) Documentation of a net zero water plan prepared by a qualified professional demonstrating and concluding that the proposed use would not result in a net increase in onsite groundwater use; or</p> <p>2) A hydrogeologic report prepared by a qualified professional demonstrating and concluding that the commercial cannabis use will not result in or exacerbate any of the following conditions of a basin or aquifer, consistent with the California Sustainable Groundwater Management Act (SGMA):</p> <p style="padding-left: 40px;">i. Chronic lowering of groundwater levels; ii. Reduction of groundwater storage;</p>

	<ul style="list-style-type: none"> iii. Seawater intrusion; iv. Degraded water quality; v. Land subsidence; vi. Depletions of interconnected surface water.
<p>Straw Vote: Reed/ Carr / Mauritson: Remove class 3 and 4 zones from ministerial</p> <p>Implemented: All language for groundwater zones 3 and 4 removed from Ministerial Permitting</p>	<p>Zone 3 and 4 Language Removed</p> <p>If the groundwater well is within Groundwater Availability Zone 3 or 4, then documentation of a dry season well yield test demonstrating minimum yield to support the combined groundwater use of existing and proposed uses in accordance with all of the following:</p> <ul style="list-style-type: none"> 1) Minimum yield to support residential water use must be established in accordance with Sec. 7-12 of this code; 2) Minimum yield to support all other uses must equal five (5) gallons per minute per one (1) acre foot of annual groundwater demand demonstrated through a 12 hour test; 3. The test must be conducted from July 15 to October 1, or during an extended test period established by the Agricultural Commissioner due to delay of rainy season. 4. 4) The test must be performed by or under the direction of a licensed water well drilling contractor (C57), pumping contractor (C61/D21), a registered civil engineer, or a registered geologist. <p>d. Protection Against Well Interference. If the groundwater well is within Groundwater Availability Zone 3 or 4, then documentation of an assessment of drawdown for all non-project wells within 500 feet of the well demonstrating maximum drawdown of 10 feet over a 24 hour simulation period, using industry standard method(s) appropriate to</p>

	<p>the project aquifer. The assessment must be performed by or under the direction of a licensed water well drilling contractor (C57), pumping contractor (C61/D21), a registered civil engineer, or a registered geologist.</p> <p>-</p> <p>-</p>
<p>Now SILENT – intent? Prohibition on Trucked Wastewater Removed</p> <p>Discussion was that trucked water would only be allowed via CUP process – no trucked with ministerial</p>	<p>Trucked Water. Trucked water for cannabis cultivation permitted under this chapter only in response to and during a local, state, or federally declared emergency or disaster, which causes all other water supplies to be unavailable or inadequate for cannabis cultivation purposes.</p>

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From: [Janice Moghtaderi](#)
To: [Cannabis](#)
Subject: April 15 meeting
Date: Thursday, April 22, 2021 1:34:38 PM

EXTERNAL

Hello,

After listening to the meeting online and browsing the online documents, I did not hear (or read) any mention of CA drought upon opening up acres and acres of this water-hungry crop. I just received another notice from my city about conserving water. What is the County of Sonoma doing to conserve water with this plan??

Thank you,

~Janice

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From: [Scott Orr](#)
To: [Cannabis](#)
Subject: FW: Planning Commission and Cannabis Ordinance
Date: Friday, April 23, 2021 8:56:45 AM

From: Greg Carr <greg99pole@gmail.com>
Sent: Friday, April 23, 2021 8:23 AM
To: Scott Orr <Scott.Orr@sonoma-county.org>
Subject: Fwd: Planning Commission and Cannabis Ordinance

EXTERNAL

----- Forwarded message -----
From: <craigspencerharrison@gmail.com>
Date: Fri, Apr 23, 2021 at 7:10 AM
Subject: Planning Commission and Cannabis Ordinance
To: Greg Carr <greg99pole@gmail.com>

Good morning Greg.

It is a pity that public comment is not allowed when the text of a p[roposed ordinance has changed.

On matters where there is a lot of public involvement, the public is a much better proof reader than county staff or county counsel. I find innumerable instances in various proposed ordinances (not just cannabis) where the drafting is sloppy, or logic is lacking.

For now, I want to pass on a major foul-up in the definition of tree that surfaced after we were forbidden to communicate with PC members.

Definition of Trees. Chapter 38 defines a tree to exclude a fruit or nut-bearing tree. As acorns are both a nut and a fruit, **this definition excludes oak trees, the very trees we are desiring to preserve**, and instead allows them to be removed with no qualifications. Likewise, all flowering trees bear fruit. The definition of excluded trees should list specific trees to be excluded, and not list trees bearing fruit or nuts for human consumption as acorns are used for human

consumption by native American tribes.

Best personal regards,

Craig S. Harrison
4953 Sonoma Mountain Road
Santa Rosa, CA 95404
707-573-9990
<https://www.craigsharrison.net/>

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From: [Dave Jefferson](#)
To: [Susan Gorin](#); [David Rabbitt](#); [district3](#); [district4](#); [district5](#)
Cc: [Andrew Smith](#); [Cannabis](#); [Scott Orr](#); [Kenwood Press](#); letters@pressdemocrat.com
Subject: FW: Letters to Editor on related Cannabis matters
Date: Friday, April 23, 2021 4:23:23 PM
Attachments: [Kenwood Press article \(April 15, 2021\).pdf](#)
[Letter to the Editor Cannabis Grows 040421 \(002\).docx](#)

EXTERNAL

Sonoma Supervisors and involved County staff,

After writing the below email to Andrew Smith, County Ag Commissioner, on April 18th, I had the opportunity to speak with Andrew briefly on the cannabis matters to be voted upon in May by the Board of Supervisors (BOS). He encouraged me to correspond directly with BOS after perhaps digging further into the 110 page Subsequent Mitigated Negative Declaration (SMND), dated January 31, 2021, prepared by County PRMD, as well as the 67 page critique, as it were (dated March 18, 2021), by Shute, Milhaly, & Weinberger (SMW), a SF law firm. Wow! Two very detailed and lengthy reports, both quite professional, in my judgement. Acknowledging it is much harder to be a creator than a critic, I was impressed with the thinking, research, and efforts that went into both. I also concluded that the BOS likely will not have adequate time to delve into all the details, and the countervailing arguments, before the matter is before them.

Secondly, the growing of cannabis in Sonoma County is an agricultural endeavor still relatively in its infancy, especially in the commercial volumes under consideration. It will be several years before many of the fundamental questions, such as average water usage/acre and workers/acre, can be established. Nevertheless, the BOS must determine new policies and cultivators must respect any new rules in the interim.

As a long time wine grape grower, without any current plans to become cannabis growers, my company nonetheless is interested in learning more about the implications of these policies. And as a resident of the County for over 10 years, I am personally sensitive to the feelings and fears of many rural neighbors who are concerned about what may be coming. Accordingly, I have highlighted some salient facts and questions raised by the reports and have proposed at least one resolution for consideration.

- The SMND report cites a maximum of 65,753 acres of cannabis cultivation on parcels of 10 acres or more, plus additional 8,289 acres of plantings in greenhouse structures on these parcels which have the potential for multiple annual crops. (SMW page 33). Since the reported acreages now cultivated is a miniscule 50, the potential growth terrifies many. Further, the potential amount of traffic estimated for the resulting workforce on rural roads at such enormous planting levels would be overwhelming. (SMD page 44) Incidentally, the total of these two cultivation maximums is 74,042 acres.
- Craig Harrington, a Bennett Valley resident, in his letter to the **Kenwood Press** editor, asserts that in Bennett Valley where Harrison lives, there are 138 parcels comprising 4,702 acres (10

or more acres/parcel). He believes that as much as 600 acres of cannabis may be planted; at present, there are reportedly 2.5 acres planted. While he does not raise considerations about water or view constraints which may decrease this planting estimate considerably, he contends that 600 acres of cannabis would require 12,000 daily workers (or 20 workers per cannabis acre). He also contends that growing cannabis requires 6 times as much water as wine grapes per acre. (While his numbers may be substantially exaggerated, one can understand his concern. My family lives in Kenwood, 15 minutes from Bennett Valley, and to see our granddaughter and her parents in Rohnert Park, we are on this road frequently.)

- The water use contentions from both the SMND and SMW are in substantial disagreement in part due to the very large number acres potentially permitted for cultivation, coupled with “over 80% of the County designated as Class 3 or 4 zones ...” (ref: SMW pages 6, 9 & 18) as well as use per acre. While noting that the proposed County water regulations for cannabis cultivation are very rigorous and continuing, there is little consensus, even in the agriculture community, as to required cannabis water use per acre. We have frequently heard 4 times the water used by vineyards, yet this past week one of my partners (considering drilling a well on his Bennett Valley land) heard from a highly experience Sonoma driller that cannabis took no more water than wine grapes! This modest contention is also rigorously supported by SMND report at page 70.
- The SMW critique states (page 12) “At the very least, the SMND should state the total acreage permitted for cultivation, broken down by the zoning district in which it is located. This data is needed to inform the County’s analysis of cumulative impacts, as well as to reveal the scope of potential new development that may be allowed by the Project.” We agree this is a reasonable request, although an effort that may take an extended time.

Therefore, the BOS might consider establishing a County acreage limit (for the time being) as a reasonable solution; why not propose a 1% limit on the total acres cited above, or 740 acres? That is a 99% reduction from the contended maximum, and yet almost 15 times that reported as permitted today. “For the time being” might be defined as the next four years, with annual reporting of cannabis acres planted, water usage, employment/acre and Vehicle Miles Traveled. Then when review of the cannabis policy comes back before the BOS, we all would have a far better factual baseline in all these key areas. (A further refinement could be allocating 150 cultivated acres per supervisorial district and requiring explicit Supervisor support for any projects exceeding such allocation.)

Due to the need to compete with cannabis grown elsewhere in CA (and there are Counties with very large plantations), we doubt that 740 total acres of cannabis will ever be developed in Sonoma County, but as a farming resident, I would like to see our agricultural sector diversify further and there be more employment and tourism potential created. We certainly need it.

Dave Jefferson

Co-Founder, Silkbush Mountain Vineyards
Western Cape, South Africa

www.Silkbush.com

US Hq: 405 Enfrente Road, #200
Novato, CA 94949 CRE#00427146
dave@burdell.com
www.Burdell.com
USA tel: 415.342.3141

From: Dave Jefferson <dave@burdell.com>
Sent: Sunday, April 18, 2021 10:46 AM
To: Andrew.Smith@sonoma-county.org
Cc: Van Solkov <van@happytravelerstours.com>; Doug Gardner <Douglass.Gardner@gmail.com>; john7777777@yahoo.com; lincoln@burdell.com; michael@vineyardadvisors.com; Joseph Destein <joseph.destein@vistagechair.com>
Subject: Letters to Editor on related Cannabis matters

Andrew,

Attached are recent Letters to the Editor from attorney Craig Harrison (Bennett Valley- **Kenwood Press**) and tour operator Van Solkov (Sonoma- **Press Democrat**) regarding the proposed changes in Sonoma County cannabis regulations that reportedly will be voted on by the Board of Supervisors on May 18th. They both reach factual and conjectural conclusions that bear further analysis, support or rejection, and advance publicity prior to the decision making by the Supervisors. We advocate a further analysis by your staff in the next 7-10 days, and then a sharing of the conclusions prior to our planned submission on this matter to both local newspapers. (Alternatively, your department may choose to provide this information directly to the media, and we would not have to raise the important open issues ourselves.)

Solkov letter to PD

Mr. Solkov said the PD required him to vet carefully his figures with the County, which cost him a \$100 County fee but provided sound information as to the approximate number of ag zoned parcels that MAY qualify for cannabis growing. That number is about 300 tax parcels. We are requesting the County refine the exercise, determine the exact number of parcels, and determine the gross number of acres involved. That number x 10% plus 300 (+/-) acres of greenhouse cannabis should equal the MAXIMUM number of cannabis acreage plantable under the proposed regulations.

Secondly, I urge the County to send a letter to each of the 300 landowners asking as to their interest in ever growing cannabis. (We should acknowledge, of course, that properties do change hands periodically, and future owners may choose to grow cannabis under the new rules that the prior owners did not.) Solkov has assumed, for the sake of the argument, that perhaps 10% or perhaps 30 properties may have cannabis aspirations. Since there are reportedly now 12 licensed grows (totaling 50 acres per the Harrison letter), Solkov concludes another 18 grows may be permitted.

Using an average of 4 cannabis acres/licensed parcel, 18 more parcels might extend to 72 more planted acres or **122 acres in total of cannabis**.

In such a County letter to the property owners, it would be reasonable to state that a one acre or more grow application requires a \$25,000 cash deposit with the County, and perhaps a budget of at least that much or more for various survey, engineering, and legal fees as well as inspections required by other state departments. Another friend of mine who recently obtained a County permit for a 3 acre grow indicated the entire process took him three years to complete and significant property improvements were required in the permit process for roads and water. Further, if a permit is obtained, a landowner then must decide if he is going to hire experienced management and labor workers and go into the cannabis growing business himself, or if he is going to lease his property to an independent cannabis company. (Clearly going into the cannabis growing business is not a simple or inexpensive undertaking by an ag property owner.)

Irrespective of assumptions and current property owners plans/interests, **the County should put a current effort into estimating the maximum plantable and most likely planting acreage under the proposed rule changes**, provide this to the public, and to the Board of Supervisors prior to May 18th.

Harrison letter to KP

Mr. Harrison contends there as many as 65,733 acres of possible cannabis growing parcels (“projects”) in the County. Again, the numbers we are requesting of the County will refine this number significantly. (Assuming Solkov’s determination of 300 larger ag parcels is substantially correct, Harrison’s figures imply an average parcel size of over 219 acres per qualifying parcel, since $219 \times 300 = 65,700$ acres.) Now 300 acres of greenhouses plus 6,570 acres of outdoor plantations = **6,870 acres of cannabis**. **This is 56 times greater than the Solkov maximum estimate**. This discrepancy cries out for resolution. (We think Harrison’s acreage contention for the County is wildly overstated but we need independently determined facts.)

In Bennett Valley where Harrison lives, he further contends there are 138 parcels comprising 4,702 acres (10 or more acres/parcel). **He believes that as much as 600 acres of cannabis may be planted;** at present, there are reportedly 2.5 acres planted. He does not raise considerations about water or view constraints which may decrease this planting estimate considerably. However, **he contends that 600 acres of cannabis would require 12,000 daily workers (or 20 workers per cannabis acre)**. He also contends that growing cannabis requires 6 times as much water as wine grapes per acre.

Grape grower response

As the head of a grape growing company in Sonoma for now over 47 years, my partners and I co-own and manage 4 Sonoma tax parcels totaling about 300 acres, and over 250 planted acres of wine grapes. While that prospectively is 30 outdoor cannabis acres plus 4 acres of greenhouses, **we have no current plans to plant any cannabis on our vineyards**. We do understand, however, that cannabis requires about 4 times the water availability per acre as grapes. We do not know how many workers are required on a daily average for cannabis, but for comparison purposes, vineyards require only one worker per 20-25 planted acres on an annual basis. (We sought an employment estimate from

an experienced Sonoma cannabis grower; he provided an average annual employment of 6-9 people per acre, including management and workers. Whether there are substantial economies of scale with employees with multiple acre grows on a parcel is not widely known; few growers in Sonoma have experience with multi acre grows of outdoor cannabis.)

We have reviewed the proposed County regulations and note that there are very strict constraints on water availability/use and view constraints on cannabis planted parcels. We noted our four parcels certainly have enough water to be planted to 10 percent of our acreage, but the “no views of cannabis plantations from public roads” may eliminate us entirely, and perhaps many more County ag parcels. We do not know how to evaluate contended terpene odors but understand they often are greatly overstated by disgruntled neighbors. We also have virtually no neighbors and would solicit their input if we ever considered growing cannabis of any significant scale.

Thanks for your input and timely assistance on these important matters ~

Dave Jefferson

Co-Founder, Silkbush Mountain Vineyards
Western Cape, South Africa
www.Silkbush.com

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LETTERS

Cannabis ordinance

The board of supervisors' proposed cannabis ordinance was apparently drafted by the cannabis industry. The accompanying environmental analysis, required by the California Environmental Quality Act, fails to analyze the cumulative effects of odor, traffic on narrow rural roads, water use, fire risk, and many other issues.

The proposal would allow cultivation on parcels 10 acres or more that are zoned agriculture or resources and rural development. As much as 65,733 acres of outdoor cannabis cultivation projects could receive ministerial permits — a backroom process without public knowledge or participation. Today about 50 acres of cannabis are being cultivated in Sonoma County.

The amount of outdoor cultivation would increase from one acre per parcel to 10% of the parcel's size. The 60-acre parcel that a limited liability corporation just purchased on Bennett Valley Road could cultivate 6 acres. In addition, it allows up to one acre per parcel of greenhouse cultivation, and no limit on cultivation in existing structures. The increased water usage (six times that of vineyards) will further stress our limited supplies, especially as we experience more droughts.

The supervisors propose to eliminate health, safety, and nuisance protections for neighbors who are subjected to noxious terpene pollution. I emailed Supervisor Gorin and asked if she agrees with forcing neighbors who need breathing tubes or have asthma to just live with the stench. She replied that she hadn't decided.

In Bennett Valley, 138 parcels comprising 4,702 acres are 10 or more acres and have the requisite zoning. The proposal would allow 470 acres of outdoor cultivation and at least 138 acres of indoor cultivation. Currently about 2.5 acres are cultivated in Bennett Valley. Outdoor cultivation could be located in hideous hoop houses covered with white plastic that would ruin our scenic landscapes and stuff our landfills with

vast mounds of torn plastic. Good thing we banned plastic bags in stores. Indoor cultivation could be in greenhouses that resemble industrial self-storage units. The visual blight would violate the Bennett Valley Area Plan, an issue the environmental analysis neglects to mention.

Using Sonoma County's own employment projections, the proposal could employ over 12,000 workers in Bennett Valley, who could generate 24,000-48,000 daily vehicle trips. Bennett Valley has under 3,000 residents. This would overwhelm our marginal road system, make emergency evacuation problematic, and violate the Bennett Valley Area Plan.

Bennett Valley has many episodes of thermal inversions throughout the year when the air is still. During such episodes, the stench of heavy terpene molecules settling on the valley floor from 600 acres of cannabis could make many homes unlivable for days or weeks at a time. When a woman in Fulton complained about cannabis odor, a county official replied that if she didn't like living with it she should move. Residents who like fresh air have to move to Marin or Napa counties where outdoor cultivation is banned?

While all 600 acres of eligible land is unlikely to become cannabis plantations, even a small increase could change Bennett Valley forever. Despite the obvious problems, the county's environmental analysis concluded that huge increases in employment and traffic, massive water demands on the Matanzas Creek watershed, and plaguing our homes with noxious terpene fumes constitutes no significant impacts. This is silly.

The county should recognize that the lives of ordinary residents are at least as important as the fantasies of large corporate cannabis enterprises. At a bare minimum, the county should prepare an environmental impact report and genuinely analyze its proposal.

—Craig S. Harrison is a retired attorney living in Bennett Valley.

Editor,

The amount of smoke and haze being generated around the proposed change to the cannabis ordinance in Sonoma County is both thick and stinky. I know: I own a cannabis tour company which has been in operation in Sonoma County since 2018.

It appears most of the letter writers don't realize how big Sonoma County is (bigger than the State of Rhode Island) nor have they calculated how many viable 10 acre or larger parcels there are in the County which meet all the requirements for a cannabis grow (the rule is 10 acres to 1 acre).

The answer to THAT question is: about 300.

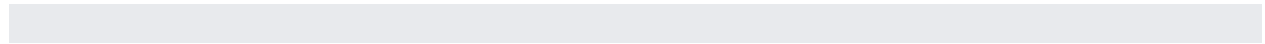
Back to the numbers. It's very expensive to turn a green field into a cannabis grow. And, how many of those 300 parcels are owned by people who are even INTERESTED in doing the work of setting up and running a cannabis grow.

Let's say 10%, just for argument's sake. That would be 30 properties. Right now in Sonoma County there are about a dozen LICENSED grows, so 18 more would not be a large scale cannabis invasion.

Remember, the first roll out of the cannabis permitting process back in July of 2017 OUTED about **5,000** legacy growers.

Perhaps sitting down and enjoying some sun grown Sonoma County cannabis is the thing which should be done.

Van Solkov
Happy Travelers Tours
144 West Spain Street #12
Sonoma CA 95476
707-386-9859



From: [Ann Possinger](#)
To: [Cannabis](#)
Subject: expanding cannabis grow sites
Date: Monday, April 26, 2021 5:10:53 PM

EXTERNAL

Please don't allow expansion of cannabis grow sites in Sonoma County at this time. We are in a drought, and you shouldn't approve any projects that use water which aren't necessary for the health of our population. I've also heard enough complaints about the smell being horrible and I wouldn't want it in my back yard.

Thank you.

Ann Possinger
5421 Santa Teresa Ave
Santa Rosa, CA 95409

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From: [Jason Saling](#)
To: [Cannabis](#)
Subject: Public Comments
Date: Monday, April 26, 2021 9:57:00 AM

EXTERNAL

Is there a compendium of the Public Comments that were submitted in relation to the proposed 2021 Cannabis Ordinance Update that can be sent my way?

NOTE: This page will be updated periodically throughout the public hearing process.

Will public comments be posted online? How can I obtain a copy of public comments submitted on the hearing draft ordinance or hearing draft Subsequent Mitigated Negative Declaration?

[Hide Answer](#)

The public comments will not be posted online until the staff report is published seven days before the Planning Commission hearing. You may email a request to Cannabis@sonoma-county.org. You will be provided with a link containing received public comments up to the date of your request.

Thank you!

Jason

Jason Saling

Vineyard Manager
Quail Hill Vineyard LLC / Lynmar Estate
(707) 328-5290
jsaling@lynmarestate.com
<http://www.lynmarestate.com>

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From: [Marcie Woychik](#)
To: [Cannabis](#); [Andrea Krout](#); [Arielle Kubu-Jones](#); [district3](#); [Elise Weiland](#); [Hannah Whitman](#); [Jason Wilson](#); [Jennifer Mendoza](#); [Jenny Chamberlain](#); [Karina Garcia](#); [Keith Roberts](#); [Leo Chyi](#); [Lynn Morton-Weil](#); [Pat Gilardi](#); [Tina Thomas](#)
Subject: FW: cannabis county-wide EIR please
Date: Tuesday, April 27, 2021 7:48:49 AM

Kind regards,

Marcie Woychik
Chief Deputy Clerk of the Board
County of Sonoma, Board of Supervisors



From: Susan Gorin
Sent: Monday, April 26, 2021 5:25 PM
To: Marcie Woychik <Marcie.Woychik@sonoma-county.org>
Subject: Fwd: cannabis county-wide EIR please

Susan Gorin

1st District Supervisor
County of Sonoma
575 Administration Drive, Room 100A
Santa Rosa, CA 95403
Phone - 707-565-3572
Susan.gorin@sonoma-county.org

Begin forwarded message:

From: Veronica Madrid <aroma62@gmail.com>
Date: April 26, 2021 at 4:58:05 PM PDT
To: Susan Gorin <Susan.Gorin@sonoma-county.org>
Subject: cannabis county-wide EIR please

EXTERNAL

Dear Supervisor Gorin,
I'm writing in hopes that it's not too late to get my opinion heard regarding the need for a cannabis EIR in Sonoma County.

I live in Rincon Valley, just outside the city limits, off Calistoga Road. I do not want to have the problems that come with a marijuana grow nearby our neighborhood!

One of my prime worries is that the ground water levels are going down all over Sonoma County. Everyone knows we're in a drought. From what I read, marijuana takes a lot of water. Why should this precious commodity go to growers and not residents?

This is a rural residential neighborhood. My well is, and has always been, a slow-recovery well. I'm pretty sure we will have to have water brought in this coming summer (due to the drought) and that's going to be very expensive. We barely squeaked by last summer without having to buy water.

A county-wide EIR is definitely needed! We all must know how these cannabis grows are going to affect our water and neighborhoods.

Also, even though it's legal, there's still plenty of news about guns and shootings around marijuana. Definitely don't want that in my neighborhood (nor does anyone else I've talked to). The smell is atrocious as well. Property values will decrease, who wants to live nearby a marijuana grow area?

The bottom line for me is **THERE'S NO GOOD REASONS TO MAKE IT EASIER FOR GROWERS IN RURAL NEIGHBORHOODS!**

We've lived here for 42 years. Hopefully my voice counts.

Thank you,
Veronica Madrid

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From: [Deborah Eppstein](#)
To: [Greg Carr](#); [Susan Gorin](#)
Cc: [Craig Harrison](#); [Arielle Kubu-Jones](#); [Cannabis](#)
Subject: Cannabis Ordinance Chapters 26 and 38
Date: Tuesday, April 27, 2021 7:50:39 AM
Attachments: [1 Chap 38 and 26 Issues with Ministerial 4-25-21pdf.pdf](#)
[1 Discrepancies between Chap 26 and 38 4-25-21 PDF.pdf](#)

EXTERNAL

Dear Greg and Susan,

I appreciate that you (Greg) have put a lot of time into reviewing the proposed cannabis ordinances and accompanying documents (Shute, Mihaly & Weinberger letter of March 18; NOAA letter of February 26, CDFW letter of March 17, and input from the public), resulting in your vote against the April 15 resolution to proceed and need for a full EIR.

There is even more information now for the supervisors to review and thoroughly understand before the May 18 meeting. Accordingly I thought it would be helpful to send the two attached summary documents to both of you.

The document entitled "Issues with Chapter 38 and 26 for Ministerial Permitting: CEQA Violations and a Proposed Path Forward" confirms the need for conducting a full EIR and requirements for ministerial permitting as concluded by Shute, Mihaly & Weinberger, lists many of the areas of discretion required by the County in the proposed Chapter 38 but not allowed under ministerial permitting, thus necessitating the CUP process, and proposes a path forward for ministerial permitting to comply with CEQA.

The document entitled "Cannabis Ordinance: Areas of Omission, Major Deficiencies and Discrepancies with Chapters 26 and 38" reflects issues with many changes that were made after the public comment period was closed, as well as issues that were raised during the public comment period but that were not addressed.

We look forward to discussing these issues with you prior to the May 18 meeting.

My best regards,
Debby

Deborah Eppstein

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Cannabis Ordinance: Issues with Chapters 38 and 26 for Ministerial Permitting
CEQA Violations and a Proposed Path Forward
Deborah Eppstein and Craig Harrison April 25, 2021

1. Draft Subsequent Mitigated Negative Declaration.

Sonoma County wishes to amend the cannabis ordinance to streamline the ministerial permitting process, and provided a draft Subsequent Mitigated Negative Declaration (February 16, 2021) and proposed new Chapter 38 (April 15, 2021). The draft SMND is wrought with deficiencies rendering it completely inadequate and requiring a full EIR as addressed on March 18, 2021 by Shute, Mihaly & Weinberger (“Shute”).

Shute concludes (page 62, emphasis added):

“As set forth above, the SMND does not come close to satisfying CEQA’s requirements. It fails to describe the Project and the existing setting and fails to provide a complete analysis of Project impacts and feasible mitigation measures. At the same time, ample evidence demonstrates that a fair argument exists that the Project may result in significant environmental impacts. In light of this evidence, CEQA requires that an EIR be prepared.”

Despite this, the Planning Commission voted 3-2 to approve the proposed Chapter 38 for ministerial permitting and the revised Chapter 26 to increase cultivation area, both based on the very deficient SMND.

2. Areas of Required Discretion in Chapter 38, Necessitating the CUP Pathway.

In addition to the need for a full EIR, there are multiple areas where the current proposed Chapter 38 requires discretion by the County. These issues must be resolved by the County before the Ministerial Permitting Process can legally be approved to qualify for the required state licenses.

Discretionary approval by the county requires full CEQA analysis and cannot be involved in any ministerial permit, discussed by Shute (Section IV, p. 17-20, in Attachment 1), who summarized:

“If adopted, the Ordinance’s permit approval regime would be in clear violation of CEQA, and each permit approval would risk a legal challenge and ultimately being overturned by a court. The County must revise the Ordinance and accompanying environmental document to acknowledge that all subsequent permit approvals will necessarily be discretionary decisions subject to review under CEQA”.

Commissioner Greg Carr drew a similar conclusion and voted against the Planning Commission resolution to advance Chapter 38 for ministerial

Summarized below are areas where the proposed Chapter 38 requires discretionary decisions, thus violating CEQA for a ministerial permit:

Anytime the Agricultural Commissioner adopts, revises or rescinds a BMP, or makes an interpretation or a decision, discretion is involved. Anytime a report or analysis is required, the county exerts discretion in assessing the qualifications of the preparer, the quality of the report and analyzing the content and conclusions of the report. Anytime odor, screening, or lighting is analyzed, discretion is required. Anytime the ‘exception’ process is invoked in the fire safety ordinances to approve use of substandard roads, discretion is required.

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Sec. 38.02.060. Best Management Practices.

The Agricultural Commissioner may adopt, amend, or rescind best management practices to implement or make specific the standards in Article 12 of this chapter.

Sec. 38.02.050. Interpretations.

A. Authority to interpret. The Agricultural Commissioner shall have the authority to interpret the provisions of this chapter. Whenever the Agricultural Commissioner determines that the meaning or applicability of any requirement of this chapter is subject to interpretation, the Agricultural Commissioner may issue an official written interpretation. The Agricultural Commissioner may also refer any issue of interpretation to the board of supervisors for determination.

Sec. 38.10.040. Decisions Final.

All decisions of the Agricultural Commissioner under this chapter are final, subject only to judicial review.

Sec. 38.10.050. Conduct of Cannabis Cultivation Under Permit.

D2 2. Special inspections and certifications. The Agricultural Commissioner may require special inspections to verify compliance with an issued permit.

Sec 38.12.050. Protection of Historical and Cultural Resources.

B. Historic Resource Survey. Discretion is required in analyzing the historic resource survey demonstrating and concluding that all impacts to significant cultural and historic resources will be avoided.

C. Cultural Resource Survey. Discretion is required in analyzing the cultural resources survey required with any application proposing ground disturbing activity to determine if a use permit is required.

D. Inadvertent Discovery, Protection of Human Remains, Archaeological Resources, and Tribal Cultural Resources. Discretion is required by the Agricultural Commissioner in analyzing the report by the qualified archeologist or qualified tribal cultural resource specialist.

Sec 38.12.060. Tree Protection.

A. Tree Protection- discretion is required in analyzing the report by a certified arborist or registered professional forester that tree removal is necessary.

B Farmland Protection.

2. Previously Developed Areas- discretion is involved in determining what is ‘heavily trafficked and highly compacted’.

3. Agricultural Production- discretion is involved in determining that the primary use of the parcel shall be agricultural production and related processing, support services, and visitor serving uses.

Sec 38.12.070- Protection of Biotic Resources.

Discretion is required in analyzing the biotic assessment report and confirming qualifications

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of the biologist concluding that the cultivation site will not impact sensitive or special status species habitat, or if located within a designated critical habitat, if mitigation and a use permit is required. Among other things, discretion is needed to determine whether surveys were conducted at appropriate periods of time, were sufficient in number, and whether the appropriate protocols were used and correctly implemented.

Sec 38.12.080. Fire Protection.

Discretion is required if any exceptions are requested to fire codes under either the local chapter 13 and 13A or the state fire safe regulations for access roads.

Sec 38.12.010- (note typo- should be 38.12.100). Design, Lighting, Security and Screening.

B. Lighting. Discretion is required in determining that no light spills onto neighboring properties or the night sky.

D2 and 3. Fencing and Visibility. Discretion is required in determining what constitutes '75% screening' as this is not defined (e.g., does this mean that only 25% of the fence is absolutely visible, or that 75% of the fence has vegetation covering it but one can still see fence under the vegetation, and if so, how much?), and in confirming no outdoor canopy is visible from a public right of way or from park trails or access points. For example, the county has demonstrated much discretion on these issues in the CUP process.

Sec 38.12.110 Filtration and Ventilation.

Discretion is involved in determining whether odor is detectable offsite from a permanent structure, including detectable limits and source(s) of odor.

Sec 38.12.120 and Sec 38.12.130. Waste Management and Waste Water and Runoff.

Discretion is required as the Agricultural Commissioner can change BMPs at will, and must ensure that waste management and runoff comply with the BMPs.

Sec 38.12.140 Water Use. Discretion is required in analyzing the net-zero water plan prepared by qualified professional 'demonstrating and concluding' no net increase in onsite groundwater use, or in analyzing the hydrogeological report prepared by a qualified professional 'demonstrating and concluding' that a list of conditions will not be exacerbated in a Priority Groundwater Basin.

Furthermore, state (CDFW, March 17 letter) and national (NOAA, February 26 letter) agencies stated that even use of surface water and well water in water zones 1 and 2 affect ground water and stream flow. They recommend a net zero water plan or hydrogeological analysis even in water zones 1 and 2 if utilizing a near-stream well or surface water, in addition to prior assessment by the county of the entire watershed scale and setting a cap on total amount of cannabis to be allowed. Meeting these requirements requires discretion.

Other areas discussed as being required in the SMND that require discretion by the county include resolving complaints by neighbors about odor. This is a major issue and needs to be

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addressed and include the possibility of revoking or modifying a permit to prevent the disturbance of neighbors. This requires discretion by the county. Is this the reason this important point discussed in the SMND as being included in Chapter 38 as well as the Health and Safety clause were omitted from Chapter 38?

3. Issues with Ministerial Permits in Chapter 26: Also Require Discretion.

Sonoma County should refrain from issuing or renewing ministerial permits under Chapter 26 because they require discretion, which violates CEQA requirements for ministerial permits and thus risk being unable to obtain CalCannabis licenses. While under Sec. 26-88-254(c) the county has determined that a zoning (ministerial) permit of 10,000 square feet, of less is “CEQA exempt” (Table 1A), the issuance of state licenses is a discretionary process by the state that requires CEQA compliance. Chapter 26 allows ministerial permits to be issued that are located in Groundwater Availability Zones 3 and 4, which because of the need for discretion in analyzing a hydrogeological report, are ineligible for ministerial permits under proposed Chapter 38.

To the extent that Sonoma County pretends to undertake a CEQA analysis for its ministerial permits under Chapter 26, its checklist omits many issues in the CEQA Guidelines checklist and many of the requirements on the County’s checklist require discretion.

As discussed above for proposed Chapter 38, discretion is required in analyzing the biotic assessment report in Chapter 26. These include confirming qualifications of the biologist concluding that the cultivation site will not impact sensitive or special status species habitat, or if located within a designated critical habitat, if mitigation and a use permit is required. Among other things, discretion is needed to determine whether surveys were conducted at appropriate periods of time, were sufficient in number, and whether the appropriate protocols were used and correctly implemented. Documentation showing the project will not impact cultural resources and groundwater analyses also can require the exercise of discretion. This runs afoul of the California Supreme Court’s decision in *Protecting Our Water & Env’t Res. v. Cty. of Stanislaus* (2020) 10 Cal.5th 479.

This problem is exacerbated by the County’s current use of “piecemealing” or “segmenting” to avoid CEQA review on its ministerial permits. The County’s practice includes issuing 4 or 5 “ministerial” permits under Chapter 26 on a single parcel to allow an acre of cannabis to be cultivated without requiring a conditional use permit. A single project has been divided into multiple pieces and each piece is supposedly evaluated separately, rather than together as a whole project.

The seminal CEQA case *Laurel Heights Improvement Association v Regents of University of California* (1988), 47 Cal. 3d 376, held that for a phased development project, all phases must be included in the project description if they are a reasonably foreseeable consequence of the initial phase. The 2021 CEQA Guidelines, § 15378(c), provides “[t]he term ‘project’ refers to the activity which is being approved and which may be subject to several discretionary approvals by governmental agencies. The term ‘project’ does not mean each separate governmental approval.” See also *Bozung v. Local Agency Formation Comm’n*

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(1975) 13 Cal.3d 263, 283-84 (CEQA mandates that “environmental considerations do not become submerged by chopping a large project into many little ones.”)

4. Possible Path Forward, in Conjunction with an EIR.

Knowing of the County’s desire to provide a streamlined ministerial permitting process for some cannabis cultivation, one possible path forward could be for the County to pre-identify areas of Sonoma County where all discretionary decisions could be made in advance by the County- i.e., prior to designating these areas as suitable for ministerial cannabis applications. This would require in depth study by the County to confirm: areas without proximity to residential homes, schools/daycare, scenic corridors, parks, or community separators; water availability and hydrogeological analysis to define areas where no impact on ground or surface water would occur even in drought for a defined upper limit of cannabis cultivation; sufficient stormwater and wastewater management; areas where no tree removal would be required; biotic assessments to determine that no critical habitats are present; historic resources and cultural assessments to determine no impacts; access road suitability for meeting state law and acceptable maximum traffic vehicle miles traveled; areas in low fire risk zones and with adequate electrical infrastructure. These analyses would determine maximum indoor, mixed light, and/or outdoor cannabis cultivation that could be supported in this defined area without negative cumulative environmental impacts and would allow for streamlined ministerial applications.

However, in light of the type and extent of prior analysis required, the ministerial process may best suited for indoor cultivation in industrial zones. Portland Oregon has done something similar for indoor cultivation in an industrial park providing approved permits, low rent and all utilities plus security (<https://growunits.com/index.html>).

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**Attachment 1. Excerpt from Shute, Mihaly & Weinberger March 18, 2021 Letter
Pages 17-20, Section IV. The permit approval process contemplated by the Ordinance
requires the exercise of discretion by County officials. (highlighting added)**

The Ordinance purports to allow “ministerial” approvals of commercial cannabis operations throughout the County. Yet, proposed Chapter 38 does not describe ministerial approvals. Per the Ordinance’s plain language, every approval of a commercial cannabis operation will necessarily be a discretionary action and thus subject to CEQA. By adopting an ordinance that purports to authorize “ministerial” approvals which in actuality trigger CEQA, the County is heading toward certain litigation from those objecting to future siting decisions for commercial cannabis operations, and from applicants for these projects.

“A project is discretionary when an agency is required to exercise judgment or deliberation in deciding whether to approve an activity. It is distinguished from a ministerial project, for which the agency merely determines whether applicable statutes, ordinances, regulations, or other fixed standards have been satisfied. Ministerial projects are those for which the law requires [an] agency to act ... in a set way without allowing the agency to use its own judgment They involve little or no personal judgment by the public official as to the wisdom or manner of carrying out the project. The public official merely applies the law to the facts as presented but uses no special discretion or judgment in reaching a decision.” *Protecting Our Water & Env’t Res. v. Cty. of Stanislaus* (2020) 10 Cal.5th 479, 489 (“POWER”) (internal quotations and citations omitted).

Under the proposed Ordinance, the Agriculture Commissioner *must* use his judgment to decide whether to issue permits. Thus, this is different from the situation in *Sierra Club v. County of Sonoma* (2017) 11 Cal.App.5th 11, where the court held that the permit in question did not involve the Commissioner’s judgment, even though the County’s ordinance might allow for discretion in other instances. *Sierra Club* therefore does not apply here. Instead, a court would hold that the County has improperly classified *all* commercial cannabis permit approvals under the ordinance as ministerial, when in fact the ordinance requires the Commissioner to exercise discretion for each permit. *POWER*, 10 Cal.5th at 499 (“County’s blanket classification ... enable[d] County to approve some discretionary projects while shielding them from CEQA review”).

The Ordinance in many instances requires plans or surveys by qualified professionals to assess impacts, but does not provide standards governing *how* these surveys/plans will be evaluated or deemed sufficient. Thus, County officials will have to exercise discretion to determine whether they are good enough.

For example, every permit application must include a “biotic resource assessment” that “demonstrates” to the Commissioner’s satisfaction that the project would not impact sensitive or special status species habitat. Proposed § 38.12.070(A)(1). Whether this plan adequately demonstrates the avoidance of impacts—including whether surveys were properly conducted to determine the presence of sensitive or special status species habitat, and what constitutes an “impact”—is necessarily left to the Commissioner’s individual discretion, a task for which he typically lacks expertise.

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Similarly, each permit application must include a wastewater management plan that, among other things, “demonstrates” to the Commissioner’s satisfaction that the project would have adequate capacity to handle domestic wastewater discharge from employees. Proposed § 38.12.130(A)(5). Each application must also include a storm water management plan and an erosion and sediment control plan that “ensure,” again to the Commissioner’s satisfaction, that runoff containing sediment or other waste or byproducts does not drain to the storm drain system, waterways or adjacent lands. Proposed § 38.12.130(B). Obviously, whether an applicant’s plans sufficiently “demonstrate” the necessary wastewater capacity, or “ensure” that runoff would not drain to waterways, would require the Commissioner’s individual judgment. Proposed sections 38.12.070(A)(1), 38.12.130(A)(5) and 38.12.130(B) apply to *all* applications regardless of size or proposed location. Each applicant must submit an energy conservation plan to reduce energy use below the threshold of significance. § 38.12.110. The Commissioner must exercise his personal judgment as to whether the plan is adequate. Thus the Commissioner will have to exercise his discretion for every permit application they process.

Other provisions that require the exercise of discretion to approve or deny a permit include, but are not limited to, proposed sections § 38.12.050(B) (historic resource survey), § 38.12.050(C) (cultural resource survey), § 38.12.130 (wastewater management plan), and § 38.12.140 (documentation of water supply).

Furthermore, unlike in *Sierra Club*, here the Commissioner’s necessary exercise of discretion under the Ordinance would be directly tied to the mitigation of impacts from individual projects. For instance, the SMND states that “future cannabis projects facilitated by a ministerial permit . . . could result in direct and indirect impacts on sensitive biological resources including sensitive-status species. . . . However, to *reduce impacts* to status species and their habitat,” applicants would be required to submit the “biotic resource assessment.” SMND at 39. As explained above, the Commissioner would have authority to decide whether this assessment adequately demonstrates that no impact would occur—in other words, whether the impact is effectively mitigated.

The Commissioner or County staff would also have discretion to determine the adequacy of the applicant’s VMT analysis demonstrating whether a proposed project would add fewer than 110 average daily vehicle trips. SMND at 89, 90. Staff shall “verify[]” that a project complies with applicable County or recommended State thresholds related to VMT and that, “if necessary, [the project] incorporates appropriate VMT-reducing measures consistent with the requirements in Mitigation Measure TRANS-1.” *Id.* at 90. With implementation of Mitigation Measure TRANS-1, “[t]his impact would be less than significant with mitigation incorporated.” *Id.* at 89. Yet, clearly, staff would need to exercise discretion to “verify” whether the applicant’s VMT analysis is adequate and whether a project “incorporates VMT-reducing measures.” *Id.* at 90.

CEQA, and not the personal judgment of County staff, governs the discretionary review of projects, including mitigation of impacts. *See Sierra Club*, 11 Cal.App.5th at 22 (ministerial approval process “is one of determining conformity with applicable ordinances and regulations, and the official has no ability to exercise discretion to mitigate environmental impacts”). Here, however, the Commissioner and/or staff would have the authority to deny a

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proposed project which in their judgment would not avoid biological, vehicle miles traveled, or other environmental impacts. *Id.* at 23 (if agency can deny, or modify, project proposal in ways that would mitigate environmental problems that CEQA compliance might conceivably have identified, then the process is discretionary). Thus, the proposed Ordinance contemplates a discretionary, and not ministerial, approval process.

If adopted, the Ordinance's permit approval regime would be in clear violation of CEQA, and each permit approval would risk a legal challenge and ultimately being overturned by a court. The County must revise the Ordinance and accompanying environmental document to acknowledge that all subsequent permit approvals will necessarily be discretionary decisions subject to review under CEQA.

Excerpt from Shute, Mihaly & Weinberger, page 62.

IX. Conclusion

As set forth above, the SMND does not come close to satisfying CEQA's requirements. It fails to describe the Project and the existing setting and fails to provide a complete analysis of Project impacts and feasible mitigation measures. At the same time, ample evidence demonstrates that a fair argument exists that the Project may result in significant environmental impacts. In light of this evidence, CEQA requires that an EIR be prepared. For this reason, SOSN respectfully requests that the Project be denied.

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The Planning Commission voted 3-2 to approve proposed Chapter 38 for ministerial permitting and with revising Chapter 26 to increase cultivation area to 10% of parcel size, as well as remove restrictions on hoop houses and amount of indoor and mixed light cultivation in the 3 ag zones plus RRD. The following is a partial listing of major deficiencies as well as discrepancies between the proposed Chapter 38 and the proposed revisions to Chapter 26.

CEQA. Chapter 38 is not supported by an adequate environmental analysis as discussed by Shute, Mihaly & Weinberger (March 18, 2021 letter to the County Planning Commission). The flawed Subsequent Mitigated Negative Declaration also cannot justify increasing the cultivation area in Chapter 26. The 2016 Mitigated Negative Declaration for the current Chapter 26 did not contemplate nor evaluate total cultivation areas larger than 1 acre, indoor cultivation larger than 5000 sf or mixed light larger than 10,000 sf in agricultural and resource zones, nor hoop houses with electrical, mechanical and plumbing and certainly not over 10% of parcel area. Thus the cultivation areas in Table 1 in Chapter 26 need to remain unchanged from the current ordinance. Going forward, before allowing increased cultivation area, the County needs to conduct a proper EIR and as noted by state (California Department of Fish and Wildlife) and federal (NOAA) agencies, evaluate water availability and interactions throughout the County across all water zones and under drought conditions. It should set a cap for each watershed for total cannabis cultivation, including water needs of hemp and other agriculture in the analysis.

Hoop Houses in the current Chapter 26 have no restrictions as the definition was removed in the February 9 ‘minor’ amendments to Chapter 26, effective March 11. Although Chapter 38 allows temporary hoop houses to have electrical, plumbing and mechanical equipment for up to 180 days, Chapter 26 previously forbade electrical and did not allow temporary hoop houses to function as mixed light. However, without a definition in Chapter 26, hoop houses are not even required to be temporary. The prior definition of temporary hoop houses banning electrical equipment needs to be reinserted into Chapter 26; the prior CEQA MND did not contemplate adding electrical to hoop houses.

The County should reconsider allowing hoop houses at all. The plastic used is an environmental nightmare, degrading in sunlight, tearing and flapping in the wind, littering the countryside, and filling landfills. Sonoma County banned plastic grocery bags for a good reason; this is many fold worse for the environment and aesthetics of our county.

Odor and Health and Safety Clause. The Health and Safety clause appropriately remains in Chapter 26 (§ 26-88-250(f)), yet was omitted in Chapter 38. The Health and Safety clause needs to be included in Chapter 38, and should allow for permits to be modified or terminated if unresolved odor or other complaints exist.

Chapter 38 has no requirement for minimizing odor impacts on neighbors from outdoor

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cultivation/hoop houses, and no provision to terminate a permit even if there are numerous unresolved complaints. This is even contrary to the SMND, which, although not a viable solution, does discuss use of fog systems to control odor from outdoor cultivation. While these systems may work in controlling odors emitted from enclosed areas such as greenhouses, they have not been used for outdoor cultivation with orders of magnitude larger areas and thus would require tremendous amount of fog solutions to be released over the cultivation site, flooding the area (e.g., over an entire acre under the current ordinance). Furthermore, long term safety of inhaling the fog vapors, which contain terpenes or caustic oxidizing agents, has not been studied in either healthy adults or in pregnant women, babies, children, the elderly and chronically ill. These vapors may also taint both the cannabis as well as grapes in nearby vineyards. The only way to control odor from outdoor cultivation is by imposing long setbacks.

Setbacks have numerous discrepancies between Chapter 26 and 38 that should be aligned now.

- Setbacks are increased to a minimum 400 ft from outdoor/hoop house cultivation site to neighboring residential property line in Chapter 38, yet remain at a minimum 100 ft in Chapter 26.
- Setbacks for greenhouses are grouped with indoor in Chapter 38 (i.e., no specified setbacks), yet are grouped with outdoor cultivation in Chapter 26. Thus Chapter 26 requires 1000 ft setbacks from property line of a cultivation site containing greenhouses to the property line of a sensitive use, yet Chapter 38 has no setback requirement.
- Setbacks from sensitive uses are measured from property line to property line in Chapter 26, yet are measured from cultivation site to the property line of the sensitive use in Chapter 38.
- Indoor cultivation must be setback 600 ft from property line of a K-12 school in Chapter 26, yet there is no setback requirement in Chapter 38.

It will take some time to conduct a proper EIR. Meanwhile it is very obvious both from the past 4 years of experience in Sonoma County as well as from EIRs conducted by others (e.g., Yolo County) that the setbacks need to be significantly increased beyond the minimums. The County should either put a moratorium on all new permits or adopt a minimum 1000 ft setback from outdoor cultivation/ hoop houses to property line under the current Chapter 26. As the setback language is listed as ‘minimum’, the knowledge that longer setbacks are needed must be applied by the County in the remaining public hearings to sunset the ongoing PRP operations. Data from other county EIRs and direct experience from Sonoma County residents support a 1000 ft minimum setback. A 1000 ft setback was originally discussed at the Planning Commission hearing for Chapter 38. This was subsequently reduced to 400 ft in the ensuing discussion, which appeared to be an arbitrary decision to justify 400 ft as no data were cited.

Indoor cultivation and greenhouses must have no odor leaving the property line in both

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Chapter 26 and 38. Even with odor control, due to 24/7 activities including traffic and noise, the County should require a minimum setback of 300 ft from adjacent property line for all indoor cultivation and processing activities. These setbacks may be revised once the results of an EIR are available.

Manufacture of THC Oil. Chapter 26 only allows this with MUP in industrial zones, with non-volatile solvents. Chapter 38 allows this industrial process in all 3 agricultural zones and RRD, with no use permit, and no restriction on use of volatile solvents. It is not clear if this is a mistake or intentional, as no detail is given (§ 38.14.020). Chapter 38 should be aligned with Chapter 26.

Processing. Chapter 26 allows up to 9 centralized processing operations in all 3 ag zones but not in RRD, and on-site processing in the 3 ag zones and RRD, indoor, or outdoors. Chapter 38 has contradictory statements requiring all processing to be indoors (§ 38.14.020B) yet also mentions outdoor processing (§ 38.14.020A), and only allows processing (indoor) of cannabis grown on site, with no centralized processing. In both Chapters 26 and 38, processing should be required to be indoors with no odor leaving the property line and with a 300 ft setback to the adjacent property line. Centralized processing should be restricted to industrial zones.

Trees should be aligned to have the same definition in Chapters 26 and 38.

Chapter 26: Tree. A healthy living large woody plant which ordinarily has a central trunk and at maturity exceeds a height of fourteen feet (14').

Chapter 38: “Tree” means a woody perennial plant, typically large with a well-defined stem carrying a definite crown, with a minimum diameter at breast height of five inches, and a minimum height of 15 feet. “Tree” does not mean a fruit- or nut-bearing tree.

The Chapter 38 definition requires discretion in determining what ‘typically large’ is and what height is ‘breast height’. Furthermore, it defines a tree to exclude a fruit or nut-bearing tree. As acorns are both a nut and a fruit, this definition excludes oak trees, the very trees we are desiring to preserve, and instead allows them to be removed with no qualifications. Likewise, all flowering trees (angiosperms) produce fruit. Thus, as drafted, the only trees for which the applicant must get an arborist to declare its need for removal is limited to conifers (gymnosperms). Rather, the definition of excluded trees should list the specific trees to be excluded. It should not list excluding trees bearing fruit or nuts for human consumption as acorns are still used for human consumption by native American tribes. Also, both the Chapter 26 and 38 definitions exclude the unique pigmy trees in Sonoma County, which can be more than a century old yet only a few feet tall. These trees need to be protected.

Proposed definition of Tree (based on Merriam Webster definition)

Tree means a woody perennial plant with usually one but may be several elongate central stems (trunk) with few branches on its lower part, and which has a minimum diameter at four feet height of five inches (combined diameter if more than one central trunk).

From: [Judy Ervice](#)
To: [Cannabis](#)
Subject: Cannabis farms
Date: Tuesday, April 27, 2021 8:53:12 PM

EXTERNAL

It seems inconceivable that Sonoma County is considering allowing Cannabis Farms in Sonoma County. There is a severe drought that will likely result in water rationing for all of us...completely unacceptable to add water guzzling pot farms.

Other counties have banned these grows for numerous reasons, not the least of which are the water issue and the smell. I know our county is desperate for revenue but please think long and hard about how this may change Santa Rosa in undesirable ways

Sincerely,
Judy Ervice
North West Santa Rosa

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From: [John M. Iervolino](#)
To: [Cannabis](#)
Subject: RE: SOCO PRIVATE SECURITY - FloraCal Indoor Cannabis Facility - Armed Guard Service
Date: Thursday, April 29, 2021 4:06:10 PM
Attachments: [image001.png](#)
[SOCO Company Overview Brief 2.22.2021.pdf](#)

EXTERNAL

Hi McCall,

Per our recent discussion, I am hoping to be included on the Sonoma County Board of Supervisors with respect to Armed Private Security at FloraCal located in unincorporated Santa Rosa.

Here is some information that may be helpful and worth considering;

Many factors contribute to the decisions of using Armed Private Security at a cannabis facility. Whether they are equipped with the right tools is based on several factors.

1. Armed guards create a sense of well-being and protective feeling by the staff and neighbors, more than an unarmed guard.
2. Armed guards are not law enforcement and they follow the orders of the client who hires them.
 - a. Protectors of property and people are their number one concern, while still performing other key guard functions.
3. Armed guards have far more extensive training and additional back ground checks to be an armed guard.
4. Armed guards are NOT trained to get into "shoot outs," actually the reverse – retreat and call for back up. The ability to diffuse and deescalate a situation is easier having the full use of tools available to them.
5. The visible presence of an armed guard creates a protective barrier from the worst case scenario.
 - a. A trained armed guard can be the difference from someone with bad intentions getting into a facility or being stopped at the door or in the parking lot, saving countless lives.
6. People with bad intentions typically and statistically do NOT choose a target with an armed guard. They choose targets that are soft or easy for theft or other negative intentions.
7. This particular site, FloraCal, was robbed by two armed suspects in the past.
8. Last but certainly not least, armed guards are better trained and thus better paid!

Please let me know what we need to do in order to have or board of supervisors consider contracted armed private security in unincorporated Santa Rosa. Thank you...

Feel free to contact me 24/7 at 415.477.1080 Ext. 7073 or on my private mobile phone at 415.299.3808.

Yours truly,

John M. Iervolino
Qualified Manager

www.Soco415.com

SOCO PRIVATE SECURITY

"To Serve & Protect"



PPO # 119759

Emergencies:

Email is not a reliable method for communicating emergency needs. Senders cannot be certain every email has been sent by their server, nor that it has been received by the addressee, nor that it will be seen within the time needed or expected. **If you have an emergency matter, it is always wise to make initial contact by telephone.**

Confidentiality:

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From: Cannabis <Cannabis@sonoma-county.org>
Sent: Tuesday, April 06, 2021 1:01 PM
To: 'john@Soco707.com' <john@Soco707.com>
Subject: RE: SOCO PRIVATE SECURITY - FloraCal Indoor Cannabis Facility - Armed Guard Service

Hello John,
I am traveling right now. I will call once I am at my desk again.

McCall Miller

Sonoma County Cannabis Program
County Administrator's Office
Cannabis@sonoma-county.org

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SOCO PRIVATE SECURITY

"To Serve & Protect"



PPO # 119759

SOCO Company Overview – Brief

SOCO PRIVATE SECURITY is a Native American veteran owned boutique security service provider, serving the public and private sector alike.

In England, where private security began, SOCO stands for “Scene of Crime Officer” ...in California, SOCO stands for Sonoma County, where the company maintains its Corporate Offices and Training Facility.

SOCO was founded by Santa Rosa resident John Iervolino, who started in security many years ago as a citizen police officer in Hawaii and, most recently, as operations manager and general manager for two of Northern California’s largest security companies.

SOCO employs military and law enforcement, as well as professionals from all career fields. Currently, SOCO is the only security service provider in California that trains all its officers, on continual basis, in appropriately identifying and interacting with the Homeless & Mentally Ill, LGBTQ+ Sensitivity and (PRT) Physical Readiness Testing. Additionally, SOCO works very close with the local Police & Sheriff’s Department.

SOCO PRIVATE SECURITY is “The New Breed in Security™,” breaking all the negative stigmas and stereotypes that plague the industry today.

OUR core values: Honesty, Integrity, Tenacity & Teamwork drive us to excellence. We invite constructive critique, own up to our mistakes and endeavor to exceed our customers’ expectations!

From: [Mike. Stiffler](#)
To: [Cannabis](#)
Subject: Re: Cannabis Ordinance Comments
Date: Monday, May 3, 2021 1:31:44 PM
Attachments: [image001.png](#)

EXTERNAL

To Sonoma Co. Supervisors : First and foremost, I request you seriously consider limiting any new cannabis permits! We have a serious drought occurring and have been asked to conserve water wherever possible. The cannabis farms use much more water than the vineyards, which have taken over the countryside. Please don't aid the drought by permitting more farms. Our reservoirs and aquifers are already hurting! Secondly, I don't understand how you can propose a 100 foot setback in residential areas when schools have a 1000 foot restriction. Do kids not live at home? And show some respect for the adults that pay taxes. Every city likes tourism, but this is pushing the limit out of greed. Don't sell out the residents for more tourists and farms!!! Michael Stiffler

On Fri, Apr 30, 2021 at 7:58 AM Cannabis <Cannabis@sonoma-county.org> wrote:

Good morning Mike,

Please send comments regarding the cannabis ordinance to this email address.

Thank you and have a nice weekend.



McCall Miller
Department Analyst | Cannabis Ombudsperson
Sonoma County Administrator's Office
E: cannabis@sonoma-county.org | sonomacounty.ca.gov/cannabis-program

The County Administrator Office's mission is to build a sustainable and equitable future for our community by making collaborative, transparent, and informed policy recommendations to the Board of Supervisors.

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From: [Andrew Smith](#)
To: [Cannabis](#)
Subject: FW: Sonoma County's Proposed Cannabis Ordinance needs significant changes
Date: Monday, May 3, 2021 3:11:25 PM
Attachments: [Neighborhood Response to Cannabis Ordinance.pdf](#)

From: SONOMAAG
Sent: Monday, May 3, 2021 3:08 PM
To: Andrew Smith <Andrew.Smith@sonoma-county.org>; Sue Ostrom <Sue.Ostrom@sonoma-county.org>
Subject: FW: Sonoma County's Proposed Cannabis Ordinance needs significant changes

Thanks, Jen
Jeanette.charter@sonoma-county.org

From: Neighborhood Coalition <itstoomuchcannabis@gmail.com>
Sent: Monday, May 3, 2021 2:53 PM
To: itstoomuchcannabis@gmail.com
Subject: Sonoma County's Proposed Cannabis Ordinance needs significant changes

EXTERNAL

To whom it may concern,

On behalf of our Coalition of Neighborhood Advocates, attached is a letter outlining recommendations for Sonoma County's proposed cannabis policy changes.

We do not believe that the staff-recommended policy that narrowly passed the Planning Commission is the best way to move forward, especially in a drought emergency and with the need for an Environmental Impact Report (EIR).

The Board of Supervisors' long-term Agenda shows this policy discussion as upcoming on your May 18 meeting.

Ahead of that May 18 meeting, some neighbors within our coalition have requested Zoom meetings with Sonoma County Supervisors to discuss this letter and their significant concerns with the staff-recommended policy changes.

We are sending this to you so that you can also be aware of the substantial issues with the proposed

cannabis ordinance as drafted. If you would like more information about how to get involved, please feel free to reach out to us.

Sincerely,

[It's Too Much Cannabis](#)

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May 3, 2021

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

RE: CANNABIS ORDINANCE, PROPOSED IMPROVEMENTS

Dear Supervisors:

We represent a coalition of neighbors and environmental activists who are trying to preserve what makes Sonoma County so special: our scenic beauty and precious natural resources. The solution is small cannabis grows away from residences, not in public view, and not spreading noise or odor. This is not what is proposed.

We don't expect to make millions of dollars from this policy change, like growers will, nor are we backed by major investors or powerful political players. We are ordinary homeowners and nature lovers, and we vote, consistently, as do our friends. We are local people who want to make Sonoma County better for everyone.

Members of our coalition have been constructively participating in this issue for years. At your behest, we have volunteered for community planning groups, reached out to staff, participated in public meetings, written letters and made endless suggestions to improve this new policy — only to see most of our recommendations sidelined and ignored. We are frustrated.

The proposed changes to the cannabis permitting process will be some of the most significant land use changes in Sonoma County in the last 40 years and, during a crushing pandemic when families are struggling with immediate needs, almost no one who's not already a grower or adjacent neighbor knows about it. Consider the context:

- Written into the Subsequent Mitigated Negative Declaration (SMND) document, more than 65,000 acres have been identified by the County for potential ministerial permits. The County, however, has *not* identified high fire danger zones, areas without a reliable source of water, lands with endangered species, areas away from neighborhoods, nor important open spaces, among other omissions. While proponents say they don't expect that many acres to actually be approved for grows, no one is offering a smaller number of acres than the 65,753 acres already stated. It's too much cannabis, and we need the County to clearly state a reduction in the acreage available for permits.
- This policy will grow tons of a new water-guzzling product, yet it relies on water survey data from 1980. We face a historically bad drought emergency that will likely extend for multiple years, caused by climate change, never considered in that 1980 data, the 20-year old General Plan Environmental Impact Report (EIR) or the SMND prepared for this policy. This policy change should not move forward without evaluating our current water resources, determining if we have enough supply to meet current and projected demand in normal and drought years.
- Calls from environmental experts and affected community members (and several Planning Commissioners) for a full Environmental Impact Report (EIR) have been ignored too many times to count. The SMND is fatally flawed. We need a full EIR which could allow the County to determine suitable areas for future grows.
- The legal recommendations and Agency input, including the California Department of Fish and Wildlife (CDFW) recommendations, among others, have not been incorporated, putting our county and taxpayers at risk of another expensive lawsuit.

This is not how we should run our county. Fortunately, you have the power to course-correct and find true consensus in our community. We offer these recommendations below in that spirit.

1. Recognize the Cumulative Impacts on Neighborhoods and our Environment

- A. Invest in a full Programmatic Environmental Impact Report (EIR) to comply with California Environmental Quality Act (CEQA) requirements, fully analyze and proactively identify locations for cannabis cultivation that are least impactful on residences and agricultural, resource, commercial and industrial zoned parcels, plus set an acreage cap for each groundwater basin.
- B. Suspend issuing and renewing cannabis permits until the EIR is completed, until setbacks between cannabis cultivation and residences and other sensitive uses are increased, and until other flaws in the newly revised Commercial Cannabis ordinances are addressed.
- C. Improve the Conditional Use Permit (CUP) processes as follows: Undertake normal land use planning for cannabis by identifying suitable sites, after the EIR is completed, and clearly identify State permit requirements, including project-specific environmental review and site criteria for proposed projects. Then determine areas suitable for cannabis operations based on evaluation of:
 - i. Water availability and impacts
 - ii. Proximity to residential homes, schools/childcare, parks/recreation, waste stream impacts from excess wastewater and plastic hoop houses
 - iii. Avoiding open spaces, all identified scenic resources, community separators, access roads, wildfire danger and other hazards, endangered or sensitive species, wildlife corridors, riparian corridors, wetlands, and historic/archeological/cultural resource sites
 - iv. Providing accessibility to law enforcement
- D. Satisfy CEQA including for ministerial permits, predetermine suitable locations that remove the need for discretion by County staff on aspects like hydrogeological analysis, biotic assessment, proper access roads, analysis of visual blight, fire risk, etc. Projects resulting in fencing, 24-hour security, nuisance lighting and odor emissions are by definition changing their surrounding environment, and thus triggering CEQA requirements.
- E. In short, align with California state regulations including:
 - i. Prop 64 – as implemented by the California Department of Food and Agriculture
 - ii. Fire safe roads – as implemented by the Board of Forestry
 - iii. CEQA – include CEQA requirements for ministerial permits
 - iv. State Water Resources Control Board and Department of Water Resources requirements for water demand, wastewater disposal and required setbacks for biotic resources, riparian habitats, etc.
- F. Eliminate the practice of issuing multiple ministerial permits to separate growers on the same or adjacent parcels. This is a loophole which leads to cumulative impacts as it amplifies the impacts many times over, obfuscates liability for violations, and does not comply with project-specific CEQA review and cumulative impact review as currently required by State law.
- G. Restore the Health and Safety clause in Chapter 38. Residents have a right to health, safety and peaceful enjoyment of their properties.
- H. Limit permitted acreage in any 10-mile square zone to prevent saturation of any one area.
- I. For all ministerial permits, impose a local residency requirement to stop the influx of non-Sonoma County operators, where “operators” are defined as owning at least 51% of the applying business.
- J. Prohibit the use of all single-use plastics in cannabis grow operations, especially for hoop houses.
- K. End the Penalty Relief Program (PRP) after May 31, 2021 and schedule public hearings for all remaining PRPs by September 30, 2021. Enough time has elapsed to give aspiring growers the opportunity to fix their applications and reapply.

2. Preserve Water and Open Spaces

- A. Maintain the Planning Commission’s inserted prohibition on all cannabis cultivation in Sonoma County’s Class 3 and 4 groundwater areas for all ministerial permits, and the County should assess water availability in all water zones as recommended by CDFW, before issuing new conditional use permits.
- B. Prohibit trucking of water or recycled wastewater under all circumstances.
- C. Require all wells to be independently monitored using a micro grid network system. Take precautionary steps to ensure that residential and agricultural wells do not run dry due to cannabis groundwater extraction or catchment systems.
- D. Prohibit all cannabis cultivation in voter-passed Community Separator parcels.
- E. Limit permit approvals during a drought, as declared by the State of California, to applicants that grow cannabis only using dry farming techniques with strict monitoring by the County.
- F. Trees with fruit or nuts have, since the original draft ordinance was published, been exempted from tree protections. Since many (or most) trees have fruits or nuts – including oak trees, whose acorns are both fruits and nuts – this exemption must be removed from proposed Chapter 38, or clarified so that the explicit intent is clear, resulting in continued protections from removal for oak and other trees.

3. Increase Setbacks, Neighborhood Compatibility and Odor Controls

- A. Require 1,000 foot minimum setbacks, from the property line, for outdoor and hoop house cultivation and 300 foot minimum setbacks for indoor cultivation — for all residences, schools, childcare facilities and parks.
- B. Require that no odor will cross the property line for all indoor cultivation and processing.
- C. Create a “Rural Residential Exclusion Zone” option for neighbors to pursue, which would be a simple and speedy (less than six months) mechanism to exclude commercial cannabis production from certain locations based on potential harm to watersheds, including wells serving residential homes, endangered species, neighborhoods with multiple homes, poor access roads and/or other site-specific constraints.
- D. Do not open agricultural or resource lands to cannabis events. Follow CalCannabis’ rules for events in commercial and industrial areas.
- E. For outdoor cultivation, require the applicant to submit the results of air quality modeling that show terpene emission levels under a series of typical weather conditions during the growing and harvesting season at the cultivation location. The modeling shall include all current and proposed sources of terpene emissions within one mile of the cultivation location, and the County may require setbacks deeper than 1,000 feet to mitigate offsite odor from outdoor and hoop house cultivation.

4. Centralize Processing of the Product

- A. Prohibit cannabis processing on-site and in residential, agricultural and resource zones. Instead, focus processing in facilities in commercial and industrial zoned land only.
- B. Prohibit cultivation and processing in areas without fire safe roads, which are narrow and often dead-end roads. This is another reason all processing should be done in our central corridor and not in our rural areas.

- C. State explicitly that cannabis is an agricultural product, not an agricultural crop, and therefore not the same as conventional agriculture and not subject to right-to-farm law.

5. Enforce with Penalties that Deter Law-breakers

- A. Change the initial term of permits to match the State License term of one year. This will allow the County to monitor performance and adjust standards on compliance with water, odor control, plastic handling and disposal. All evidenced claims of potential violations will be investigated immediately.
- B. Renew permits with no violations or unresolved complaints for two years, with the caveat that if violations and complaints occur later, the County will revoke the permit, effective immediately.
- C. Require posting of a \$50,000 bond upon issuance of each permit, to be used to remove structures, fencing and trash if the operator abandons a grow site, as well as to pay for enforcement; otherwise, the taxpayers will shoulder these costs.
- D. Do not give cannabis growers notice prior to inspections of their facilities for compliance checks. State law does not require this.
- E. Implement an enforcement team, similar to Humboldt County, consisting of Sheriffs, Fish and Wildlife and Water Resources staff to perform surprise inspections for compliance.
- F. Stop bad actors. Any person performing an illegal or un-permitted activity shall be required to stop all activities immediately, dismantle operations, pay a fine and be put under a two year probation where the violating operator will not be issued any cannabis permits.

In a news article from Sunday, April 18, the Press Democrat reported “cannabis varies in value from \$5.5 million to \$6 million per acre annually, compared to wine grapes that were about a \$11,000 per-acre value in 2019, county Agriculture Commissioner Andrew Smith said.” There’s a lot of money on the table, we understand that.

But pushing through a major policy like this — during a pandemic when so many people are struggling, without adequate environmental review, during a drought emergency with no adequate evaluation of water availability, or listening to affected neighbors — it’s an unnecessary rush to judgment. Don’t pass this Ordinance just to get it off your agenda, like an ill-advised Chanate sale or an ill-conceived school funding ballot measure, because this will come back to haunt you. Slow down, listen to neighbors and the environmental community, learn from past mistakes, and let’s do this the right way.

Make the changes we requested above and give neighbors and our environment a better deal. We cannot afford to get this wrong. Thank you.

Sincerely,

Bridget Beytagh
Friends of Graton (FOG)

Tess and Tom Danaher
Barlow Lane Neighbors

Deborah Eppstein

Ron Evenich
No Pot on Pepper Lane

Chris Gralapp
Bennett Valley Citizens for
Safe Development

Kim Gutzman
Barlow Lane Neighbors

Bill Krawetz
Gold Ridge Neighborhood

Katie Moore

Anna Ransome
Friends of Graton (FOG)

Vi Strain
Concerned Citizens of
Bloomfield

**Marsha Vas Dupre and Jack
Dupre**

Rachel and Gene Zierdt
Coffee Lane Neighbors

CC:

Sonoma County Administrators Office
Sonoma County Counsel's Office
Sonoma County Agriculture Commission
Mayors of Sonoma County Cities
The Press Democrat
Petaluma Argus Courier
Sonoma West Times & News
Kenwood Press
Oakmont Times
North Bay Business Journal
Sonoma County Gazette
Sonoma Index-Tribune
Sonoma Sun
Greenbelt Alliance
Sierra Club
Sonoma County Water Coalition
Sonoma County Conservation Action
Preserve Rural Sonoma County
Bay Area Chapter of the Gospel Coalition
Interfaith Council of Sonoma County
League of Women Voters
North Bay Labor Council
Sonoma County Vintners Association

From: [Ann Conger](#)
To: [Arielle Kubu-Jones](#); [Andrea Krout](#); [district3](#); [district5](#); [ichamber@sonoma-county.org](#); [Cannabis](#)
Subject: Really? Cannabis Ordinance BOS 5/18/21
Date: Tuesday, May 4, 2021 3:31:32 PM

EXTERNAL

To all concerned:

It's hard for me to understand why our county officials have so much disregard for the rural residents. I have lived on the same road for 50 years. Why would it be allowed that this new, money crop come in to disrupt the natural nature we enjoy? You are very aware of the distasteful attributes of cannabis, to which I'm referring.

As a licensed REALTOR, I am very aware that a cannabis operation in an area will have a negative affect on property values.

I have been closely following the amendments and revisions to the cannabis ordinance for Sonoma County, have read the letters in the newspapers and the information and analysis from neighborhood groups. I'm unhappy that the County has not reached out to residents and has been influenced too much by the industry in the drafting. I have come to the conclusion that the Subsequent Mitigated Declaration is fatally flawed and unfixable. It is time to return to the Board's earlier decision to do a project-wide EIR for Phase 2. Sonoma County needs an EIR, one which will protect our natural resources, will comply with CEQA requirements and at the same time give residents a right to their health, safety and peaceful enjoyment of their properties.

Thank you for your consideration.

--

Ann Conger - Realtor
CalBRE Lic.# 01443616
2002 Coffee Lane
Sebastopol, CA 95472
[Better Homes and Gardens Real Estate](#)
Wine Country Group
707-888-3637

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From: [Diana Van Ry](#)
To: [Cannabis](#)
Subject: Cannabis Ordinance BOS 5/18/21
Date: Tuesday, May 4, 2021 1:42:17 PM

EXTERNAL

Dear Supervisors:

I have been closely following the amendments and revisions to the cannabis ordinance for Sonoma County, have read the letters in the newspapers and the information and analysis from neighborhood groups. I'm unhappy that the County has not reached out to residents, and has been influenced too much by the industry in the drafting. In addition, I have much concern about the extraordinary amount of water it takes to grow a cannabis crop — this while we all know the Western states are virtually in a constant drought cycle. I have come to the conclusion that the Subsequent Mitigated Declaration is fatally flawed and unfixable. It is time to return to the Board's earlier decision to do a project-wide EIR for Phase 2. Sonoma County needs an EIR, one which will protect our natural resources, will comply with CEQA requirements and at the same time give residents a right to their health, safety and peaceful enjoyment of their properties.

Sincerely,

Allan Tilton
Diana Van Ry
2573 Greenvale Lane
Santa Rosa, CA 95401
707-541-6670

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From: [BARBARA DUNHAM](#)
To: [Cannabis](#)
Subject: Fw: Cannabis Ordinance BOS 5/18/21
Date: Tuesday, May 4, 2021 3:07:35 PM

EXTERNAL

----- Forwarded Message -----

From: BARBARA DUNHAM <bdunhamseb@sbcglobal.net>
To: Arielle.Kubu-Jones@sonoma-county.org <arielle.kubu-jones@sonoma-county.org>;
Andrea.Krout@sonoma-county.org <andrea.krout@sonoma-county.org>; District3@sonoma-county.org
<district3@sonoma-county.org>; jchamber@sonoma-county.org <jchamber@sonoma-county.org>;
District5@sonoma-county.org <district5@sonoma-county.org>
Sent: Tuesday, May 4, 2021, 08:52:13 AM PDT
Subject: Cannabis Ordinance BOS 5/18/21

Dear Supervisors:

I have been closely following the amendments and revisions to the cannabis ordinance for Sonoma County, have read the letters in the newspapers and the information and analysis from neighborhood groups. I'm unhappy that the County has not reached out to residents and has been influenced too much by the industry in the drafting. I have come to the conclusion that the Subsequent Mitigated Declaration is fatally flawed and unfixable. It is time to return to the Board's earlier decision to do a project-wide EIR for Phase 2. Sonoma County needs an EIR, one which will protect our natural resources, will comply with CEQA requirements and at the same time give residents a right to their health, safety and peaceful enjoyment of their properties.

Sincerely,

Barbara A. Dunham
411 Eleanor Avenue
Sebastopol, CA 95472
707-823-2318

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From: [William Saxon](#)
To: [Arielle Kubu-Jones](#); [Andrea Krout](#); [district3](#); [Jenny Chamberlain](#); [district5](#); [Cannabis](#)
Subject: Cannabis Ordinance BOS 5/18/21
Date: Tuesday, May 4, 2021 6:56:54 PM

EXTERNAL

Dear Supervisors:

I have been closely following the amendments and revisions to the cannabis ordinance for Sonoma County, have read the letters in the newspapers and the information and analysis from neighborhood groups. I'm unhappy that the County has not reached out to residents and has been influenced too much by the industry in the drafting. I have come to the conclusion that the Subsequent Mitigated Declaration is fatally flawed and unfixable. It is time to return to the Board's earlier decision to do a project-wide EIR for Phase 2. Sonoma County needs an EIR, one which will protect our natural resources, will comply with CEQA requirements and at the same time give residents a right to their health, safety and peaceful enjoyment of their properties.

Bill Saxon
Graton

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From: [Clara Enriquez](#)
To: [Arielle Kubu-Jones](#); [Andrea Krout](#); [district3](#); [Jenny Chamberlain](#); [district5](#); [Cannabis](#)
Subject: Cannabis Ordinance BOS 5/18/21
Date: Tuesday, May 4, 2021 7:49:48 PM

EXTERNAL

Dear Supervisors:

I have been closely following the amendments and revisions to the cannabis ordinance for Sonoma County, have read the letters in the newspapers and the information and analysis from neighborhood groups. I'm unhappy that the County has not reached out to residents and has been influenced too much by the industry in the drafting. I have come to the conclusion that the Subsequent Mitigated Declaration is fatally flawed and unfixable. It is time to return to the Board's earlier decision to do a project-wide EIR for Phase 2. Sonoma County needs an EIR, one which will protect our natural resources, will comply with CEQA requirements and at the same time give residents a right to their health, safety and peaceful enjoyment of their properties.

Clara T. Enriquez

Graton, CA 95444

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From: [Cecile Isaacs](#)
To: [Cannabis](#)
Subject: Fwd: Cannabis Ordinance BOS 5/18/21: Sonoma County needs an EIR
Date: Tuesday, May 4, 2021 4:17:34 PM

EXTERNAL

----- Forwarded message -----

From: **Cecile Isaacs** <cecile.isaacs@gmail.com>
Date: Tue, May 4, 2021 at 11:31 AM
Subject: Cannabis Ordinance BOS 5/18/21: Sonoma County needs an EIR
To: <Arielle.Kubu-Jones@sonoma-county.org>, <Andrea.Krout@sonoma-county.org>, <District3@sonoma-county.org>, <jchamber@sonoma-county.org>, <District5@sonoma-county.org>

Dear Supervisors:

I read the proposed amendments and revisions to the cannabis ordinance for Sonoma County, read the letters in the newspapers and the information and analysis from neighborhood groups.

After your diligent review of the file, you must agree that the Subsequent Mitigated Declaration is completely bogus! Please return with a decision to do a project-wide EIR for Phase 2. ***Sonoma County needs an EIR***, one which will protect our natural resources, and one that will comply with CEQA requirements.

Cecile Isaacs, Palmer Creek (Healdsburg)

--

Cecile
Cell phone 510-693-3459

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From: [concerned citizens](#)
To: [Cannabis](#)
Subject: Fwd: Cannabis Ordinance BOS 5/18/21
Date: Tuesday, May 4, 2021 4:04:14 PM

EXTERNAL

Begin forwarded message:

From: piano farmer <pianofarmers@gmail.com>
Subject: Cannabis Ordinance BOS 5/18/21
Date: May 4, 2021 at 1:04:32 PM PDT
To: Lynda.Hopkins@sonoma-county.org
Cc: Arielle.Kubu-Jones@sonoma-county.org, District3@sonoma-county.org, District5@sonoma-county.org, jchamber@sonoma-county.org, Andrea Krout <Andrea.Krout@sonoma-county.org>

Dear Supervisor Hopkins,

Thank you for all the work you are doing in this county on Climate Change. Addressing this issue soundly will foster a shift from exploitive to sustainable practices in our world and will preserve the health of the environment.

How does cannabis production under the proposed new ordinance fit into environmental sustainability models? I live in Bloomfield, next door to a proposed commercial cannabis operation. I have read the ordinance, and what I don't understand is: why isn't the zoning more nuanced when it comes to choosing sites that are a good fit for cannabis? It seems to me (and to our group, the Concerned Citizens of Bloomfield) that there could be a three-tiered approach that would mitigate a lot of the conflicts that are arising around this issue.

The idea that one size fits all is a blunt approach to zoning a large, diverse county. If there was a tiered approach to the zoning, it would better reflect the county's various conditions and make the process smoother and easier on both the growers and the residents.

The proposed zoning could work well for large agricultural parcels adjacent to other large agricultural parcels. The agricultural zones immediately adjacent to RR and other residential zoning should have different setbacks and operating restrictions than those immediately adjacent to other agricultural zoned areas. The RR zones contain smaller parcels, with less flexibility to adjust to their neighbors. Being located in rural areas, these smaller parcels depend on their outdoor spaces. This would protect the 40+ residential enclaves that are spread throughout the county. These towns are long-standing and have been recognized with their RR zoning.

The difference in processing restrictions/operations, as well as setbacks, should also be more

nuanced. Processing should be placed in areas that have been designated industrial, since those areas have the transportation and infrastructure to better handle cannabis processing.

Our community of Bloomfield evolved organically, over time. The sudden rush to establish a craft cannabis brand with the same name as our town, and a cannabis grow in the middle of our community, feels threatening to most of the town's residents. We are not opposed to cannabis being legal, or to growing it ethically and sustainably. We just don't think it is the best zoning practice, to allow farms directly on the borders of rural communities. We are asking for 1000-ft buffer zones at the property line, and we are asking for a complete EIR before adopting the ordinance.

It is important to get this ordinance right. Please don't do what was done with grapes, and allow years of strife in our communities to hone the ordinance.

Part of our task involving creating a more sustainable way of living in the biosphere is so that we can preserve an environment that is hospitable to all life, to care for ourselves, the planet, and each other. We need to be able to rest and digest in a safe place. Homes are sensitive areas where people are born, live, and die. Not one person I have met in Sonoma County wants to live next door to a commercial cannabis operation. These two uses are not compatible. The current ordinance does not address neighborhood compatibility.

I know this is a complicated issue, with many competing interests and lots of potential money to be made. Please put the environment first by completing an EIR. Please put the people first by addressing neighborhood compatibility.

I have been reading about commercial cannabis flop in Canada. Sometimes the promised revenue never arrives if the plan is not thought all the way through.

Please take the time and resources necessary to get this ordinance right.

Veva Edelson

Carbon Farmer/ Artist
415 640-8837
Piano Farm
11870 Mill St.
Petaluma, CA 94952
Member Farm Trails
Member Farm Bureau

Warning: If you don't know this email sender or the email is unexpected, **do not** click any web links, attachments, and **never** give out your user ID or password.

From: [Dee Swanhuysen](#)
To: [Cannabis](#)
Subject: Fwd: Cannabis Ordinance BOS 5/18/21
Date: Tuesday, May 4, 2021 3:31:01 PM

EXTERNAL

Begin forwarded message:

From: Dee Swanhuysen <pdswan@comcast.net>
Subject: Cannabis Ordinance BOS 5/18/21
Date: May 4, 2021 at 9:31:18 AM PDT
To: Arielle.Kubu-Jones@sonoma-county.org, Andrea.Krout@sonoma-county.org, District3@sonoma-county.org, jchamber@sonoma-county.org, District5@sonoma-county.org

Dear Supervisors:

I have been closely following the amendments and revisions to the cannabis ordinance for Sonoma County, have read the letters in the newspapers and the information and analysis from neighborhood groups. I'm unhappy that the County has not reached out to residents and has been influenced too much by the industry in the drafting. I have come to the conclusion that the Subsequent Mitigated Declaration is fatally flawed and unfixable. It is time to return to the Board's earlier decision to do a project-wide EIR for Phase 2. Sonoma County needs an EIR, one which will protect our natural resources, will comply with CEQA requirements and at the same time give residents a right to their health, safety and peaceful enjoyment of their properties.

Dee Swanhuysen
1800 Jonive Rd
Sebastopol, CA 95472

THIS EMAIL ORIGINATED OUTSIDE OF THE SONOMA COUNTY EMAIL SYSTEM.

Warning: If you don't know this email sender or the email is unexpected, **do not** click any web links, attachments, and **never** give out your user ID or password.

From: [Emily Allen](#)
To: [Cannabis](#)
Subject: Cannabis Ordinance BOS 5/18/21
Date: Tuesday, May 4, 2021 1:11:03 PM

EXTERNAL

Dear Supervisors:

I have been closely following the amendments and revisions to the cannabis ordinance for Sonoma County, have read the letters in the newspapers and the information and analysis from neighborhood groups. I'm unhappy that the County has not reached out to residents and has been influenced too much by the industry in the drafting. I have come to the conclusion that the Subsequent Mitigated Declaration is fatally flawed and unfixable. It is time to return to the Board's earlier decision to do a project-wide EIR for Phase 2. Sonoma County needs an EIR, one which will protect our natural resources, will comply with CEQA requirements and at the same time give residents a right to their health, safety and peaceful enjoyment of their properties.

Emily Stewart
Citizen of Bloomfield, Ca

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Warning: If you don't know this email sender or the email is unexpected, **do not** click any web links, attachments, and **never** give out your user ID or password.

From: elizabeth.herron
To: [Cannabis](#)
Subject: cannabis
Date: Tuesday, May 4, 2021 6:28:00 PM

EXTERNAL

Dear Supervisors:

I have been following the amendments and revisions to the cannabis ordinance for Sonoma County, have read the letters in the newspapers and the information and analysis from neighborhood groups. I'm unhappy that the County has not reached out to residents and has been influenced too much by the industry in the drafting. I have come to the conclusion that the Subsequent Mitigated Declaration is fatally flawed and unfixable. It is time to return to the Board's earlier decision to do a project-wide EIR for Phase 2. Sonoma County needs an EIR, one which will protect our natural resources, will comply with CEQA requirements and at the same time give residents a right to their health, safety and peaceful enjoyment of their properties.

Sincerely,
Elizabeth Herron

Elizabeth C. Herron
poetherron@gmail.com
P O Box 315, Graton
CA 95444

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Warning: If you don't know this email sender or the email is unexpected,
do not click any web links, attachments, and **never** give out your user ID or password.

From: [elizabeth herron](#)
To: [Cannabis](#)
Subject: Cannabis Ordinance BOS 5/18/21
Date: Tuesday, May 4, 2021 7:02:41 PM

EXTERNAL

Dear Supervisors:

I have been following the amendments and revisions to the cannabis ordinance for Sonoma County, have read the letters in the newspapers and the information and analysis from neighborhood groups. I'm unhappy that the County has not reached out to residents and has been influenced too much by the industry in the drafting. I have come to the conclusion that the Subsequent Mitigated Declaration is fatally flawed and unfixable. It is time to return to the Board's earlier decision to do a project-wide EIR for Phase 2. Sonoma County needs an EIR, one which will protect our natural resources, will comply with CEQA requirements and at the same time give residents a right to their health, safety and peaceful enjoyment of their properties.

Elizabeth C. Herron
Graton, CA
poetherron@gmail.com

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From: [Ellen Rilla-Laherty](#)
To: [Cannabis](#)
Subject: So Co Cannabis Ordinance Hearing May 18
Date: Tuesday, May 4, 2021 3:01:28 PM

EXTERNAL

Dear Supervisors:

I have been closely following the amendments and revisions to the cannabis ordinance for Sonoma County, have read the letters in the newspapers and the information and analysis from neighborhood groups. I'm unhappy that the County has not reached out to residents and has been influenced too much by the industry in the drafting. I have come to the conclusion that the Subsequent Mitigated Declaration is fatally flawed and unfixable. It is time to return to the Board's earlier decision to do a project-wide EIR for Phase 2. Sonoma County needs an EIR, one which will protect our natural resources, will comply with CEQA requirements and at the same time give residents a right to their health, safety and peaceful enjoyment of their properties.

Ellie Rilla
Sebastopol

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From: [Jennifer Butler](#)
To: [Cannabis](#)
Subject: Cannabis Ordinance BOS 5/18/21
Date: Tuesday, May 4, 2021 4:07:53 PM

EXTERNAL

Dear Supervisors:

I have been closely following the amendments and revisions to the cannabis ordinance for Sonoma County, have read the letters in the newspapers and the information and analysis from neighborhood groups. I'm unhappy that the County has not reached out to residents and has been influenced too much by the industry in the drafting. I have come to the conclusion that the Subsequent Mitigated Declaration is fatally flawed and unfixable. It is time to return to the Board's earlier decision to do a project-wide EIR for Phase 2. Sonoma County needs an EIR, one which will protect our natural resources, will comply with CEQA requirements and at the same time give residents a right to their health, safety and peaceful enjoyment of their properties.

Jennifer Butler _ Graton

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Warning: If you don't know this email sender or the email is unexpected, **do not** click any web links, attachments, and **never** give out your user ID or password.

From: sedna101@aol.com
To: [Cannabis](#)
Subject: Cannabis Ordinance BOS 5/18/21
Date: Tuesday, May 4, 2021 3:49:57 PM

EXTERNAL

I'm unhappy that the County has not reached out to residents and has been influenced too much by the industry in the drafting.

At your behest, I and others have volunteered for community planning groups, reached out to staff, participated in public meetings, written letters and made endless suggestions to improve this new policy — only to see most of our recommendations sidelined and ignored. We are frustrated.

The legal recommendations and Agency input, including the California Department of Fish and Wildlife (CDFW) recommendations, among others, have not been incorporated, putting our county and taxpayers at risk of another expensive lawsuit. This is not how we should run our county.

Fortunately, you have the power to course-correct and find true consensus in our community.

I have come to the conclusion that the Subsequent Mitigated Declaration is fatally flawed and unfixable. It is time to return to the Board's earlier decision to do a project-wide EIR for Phase 2. Sonoma County needs an EIR, one which will protect our natural resources, will comply with CEQA requirements and at the same time give residents a right to their health, safety and peaceful enjoyment of their properties.

Jane Eagle Graton, Ca 95444

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From: [Kate Haug](#)
To: [Cannabis](#)
Subject: Fwd: Public Comment - Cannabis Ordinance BOS 5/18/21
Date: Tuesday, May 4, 2021 6:41:07 PM

EXTERNAL

Please see the following letter to the Board of Supervisors for your records.
Thank you,
Kate Haug

----- Forwarded message -----

From: **Kate Haug** <kate@kurtnoble.com>
Date: Tue, May 4, 2021 at 4:54 PM
Subject: Public Comment - Cannabis Ordinance BOS 5/18/21
To: <Arielle.Kubu-Jones@sonoma-county.org>, <Andrea.Krout@sonoma-county.org>, <District3@sonoma-county.org>, <jchamber@sonoma-county.org>, district5 <District5@sonoma-county.org>

Dear Supervisors:

I'm unhappy that the County has not reached out to residents and has been influenced too much by the cannabis industry in the drafting of the new cannabis ordinance. It is time to return to the Board's earlier decision to do a project-wide Environmental Impact Report (EIR) before adopting a flawed ordinance. Sonoma County needs an EIR, one which will protect our natural resources (including our groundwater), will comply with State CEQA requirements and at the same time give residents a right to their health, safety and peaceful enjoyment of their properties.

Kate Haug
Sebastopol

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From: kjones95472@comcast.net
To: [Cannabis](#)
Subject: Fwd: Cannabis Ordinance
Date: Tuesday, May 4, 2021 6:17:36 PM

EXTERNAL

Dear Supervisors,

I have been closely following the amendments and revisions to the cannabis ordinance for Sonoma County, have read the letters in the newspapers and the information and analysis from neighborhood groups. I'm unhappy that the County has not reached out to residents and has been influenced too much by the industry in the drafting. I have come to the conclusion that the Subsequent Mitigated Declaration is fatally flawed and unfixable. It is time to return to the Board's earlier decision to do a project-wide EIR for Phase 2. Sonoma County needs an EIR, one which will protect our natural resources, will comply with CEQA requirements and at the same time give residents a right to their health, safety and peaceful enjoyment of their properties,

And water for their homes!

Karen Jones

Sebastopol Hardware Center
Co-Owner, Advertising Manager
Home office (707) 823-8091
Fax (707) 823-0968

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From: [Liz Brown &/or Kate Winter](#)
To: [Cannabis](#)
Subject: Cannabis Ordinance BOS 5/18/21
Date: Tuesday, May 4, 2021 11:49:46 PM

EXTERNAL

From: Kate <winterbrown@earthlink.net>
Subject: Cannabis Ordinance BOS 5/18/21
Date: May 4, 2021 at 12:07:16 PM PDT
To: Arielle.Kubu-Jones@sonoma-county.org, Andrea.Krout@sonoma-county.org, District3@sonoma-county.org, jchamber@sonoma-county.org, District5@sonoma-county.org

Dear Supervisors:

We have been closely following the amendments and revisions to the cannabis ordinance for Sonoma County, have read the letters in the newspapers and the information and analysis from neighborhood groups. We're unhappy that the County has not reached out to residents and has been influenced too much by the industry in the drafting. We have come to the conclusion that the Subsequent Mitigated Declaration is fatally flawed and unfixable. It is time to return to the Board's earlier decision to do a project-wide EIR for Phase 2. Sonoma County needs an EIR, one which will protect our natural resources, will comply with CEQA requirements and at the same time give residents a right to their health, safety and peaceful enjoyment of their properties.

Kate Winter & Liz Brown

West County (Our property is zoned rural residential and abuts DA properties.)

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Warning: If you don't know this email sender or the email is unexpected, **do not** click any web links, attachments, and **never** give out your user ID or password.

From: [Linda Conley](#)
To: [Cannabis](#)
Subject: Cannabis Ordinance BOS 5/18/2021
Date: Tuesday, May 4, 2021 12:38:14 PM

EXTERNAL

Dear Supervisors:

I'm writing with great urgency and alarm regarding this issue and possible upcoming actions, which I believe could alter the character of life in this county irreparably. I have been closely following the amendments and revisions to the cannabis ordinance for Sonoma County, have read the letters in the newspapers and the information and analysis from neighborhood groups. I'm appalled that the County has not reached out to residents and has been influenced too much by the industry in the drafting. I have come to the conclusion that the Subsequent Mitigated Declaration is fatally flawed and unfixable.

It is imperative to return to the Board's earlier decision to do a project-wide EIR for Phase 2, inexplicably lost in the process. Sonoma County needs an EIR, one which will protect our natural resources, will comply with CEQA requirements and at the same time give residents a right to their health, safety and peaceful enjoyment of their properties.

Respectfully,
Linda Conley, Sebastopol, CA

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From: [Maureen Lomasney](#)
To: [Arielle Kubu-Jones](#); [Andrea Krout](#); [district3](#); [Jenny Chamberlain](#); [district5](#); [Cannabis](#)
Subject: Cannabis Ordinance BOS 5/18/2021
Date: Tuesday, May 4, 2021 7:49:18 PM

EXTERNAL

Dear Supervisors:

I have been closely following the amendments and revisions to the cannabis ordinance for Sonoma County, have read the letters in the newspapers and the information and analysis from neighborhood groups.

I'm unhappy that the County has not reached out to residents and has been influenced too much by the industry in the drafting. I have come to the conclusion that the Subsequent Mitigated Declaration is fatally flawed and unfixable.

It is time to return to the Board's earlier decision to do a project-wide EIR for Phase 2. Sonoma County needs an EIR, one which will protect our natural resources, will comply with CEQA requirements and at the same time give residents a right to their health, safety and peaceful enjoyment of their properties.

Sincerely,

MAUREEN LOMASNEY
GRATON CA 95444
maureenlomasney@gmail.com

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Warning: If you don't know this email sender or the email is unexpected,
do not click any web links, attachments, and **never** give out your user ID or password.

From: [Marcy Meadows](#)
To: [Cannabis](#)
Subject: Fwd: Cannabis Ordinance BOS 5/18/21
Date: Tuesday, May 4, 2021 9:30:26 PM

EXTERNAL

----- Original Message -----

From: Marcy Meadows <marcym1@comcast.net>
To: "Arielle.Kubu-Jones@sonoma-county.org" <Arielle.Kubu-Jones@sonoma-county.org>, "Andrea.Krout@sonoma-county.org" <Andrea.Krout@sonoma-county.org>, "District3@sonoma-county.org" <District3@sonoma-county.org>, "jchamber@sonoma-county.org" <jchamber@sonoma-county.org>, "District5@sonoma-county.org" <District5@sonoma-county.org>
Date: 05/04/2021 12:03 PM
Subject: Cannabis Ordinance BOS 5/18/21

Dear Supervisors:

I have been closely following the amendments and revisions to the cannabis ordinance for Sonoma County, have read the letters in the newspapers and the information and analysis from neighborhood groups. I'm unhappy that the County has not reached out to residents and has been influenced too much by the industry in the drafting. I have come to the conclusion that the Subsequent Mitigated Declaration is fatally flawed and unfixable. It is time to return to the Board's earlier decision to do a project-wide EIR for Phase 2. Sonoma County needs an EIR, one which will protect our natural resources, will comply with CEQA requirements and at the same time give residents a right to their health, safety and peaceful enjoyment of their properties.

Marcy Meadows
2609 S Edison
Gaton

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Warning: If you don't know this email sender or the email is unexpected, **do not** click any web links, attachments, and **never** give out your user ID or password.

From: nancy.rowinsky
To: [Cannabis](#)
Subject: Fwd: Cannabis Ordinance BOS 5/18/21
Date: Tuesday, May 4, 2021 3:47:12 PM

EXTERNAL

----- Forwarded message -----

From: **nancy rowinsky** <nrowinsky@gmail.com>
Date: Tue, May 4, 2021 at 10:50 AM
Subject: Cannabis Ordinance BOS 5/18/21
To: <Arielle.Kubu-Jones@sonoma-county.org>, <Andrea.Krout@sonoma-county.org>, <District3@sonoma-county.org>, <jchamber@sonoma-county.org>, <District5@sonoma-county.org>

Dear Supervisors:

I have been closely following the amendments and revisions to the cannabis ordinance for Sonoma County, have read the letters in the newspapers and the information and analysis from neighborhood groups. I'm unhappy that the County has not reached out to residents and has been influenced too much by the industry in the drafting. I have come to the conclusion that the Subsequent Mitigated Declaration is fatally flawed and unfixable. It is time to return to the Board's earlier decision to do a project-wide EIR for Phase 2. Sonoma County needs an EIR, one which will protect our natural resources, will comply with CEQA requirements and at the same time give residents a right to their health, safety and peaceful enjoyment of their properties.

Nancy Rowinsky
Sebastopol

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Warning: If you don't know this email sender or the email is unexpected, **do not** click any web links, attachments, and **never** give out your user ID or password.

From: [Patrick Fanning](#)
To: [Cannabis](#)
Subject: Fwd: Cannabis Ordinance BOS 5/18/21
Date: Tuesday, May 4, 2021 3:39:54 PM

EXTERNAL

Begin forwarded message:

From: Patrick Fanning <fanning@sonic.net>
Subject: Cannabis Ordinance BOS 5/18/21
Date: May 4, 2021 at 11:49:24 AM PDT
To: District3@sonoma-county.org

Dear Supervisors:

I have been closely following the amendments and revisions to the cannabis ordinance for Sonoma County, have read the letters in the newspapers and the information and analysis from neighborhood groups. I'm unhappy that the County has not reached out to residents and has been influenced too much by the industry in the drafting. I have come to the conclusion that the Subsequent Mitigated Declaration is fatally flawed and unfixable. It is time to return to the Board's earlier decision to do a project-wide EIR for Phase 2. Sonoma County needs an EIR, one which will protect our natural resources, will comply with CEQA requirements and at the same time give residents a right to their health, safety and peaceful enjoyment of their properties.

Best Regards,

Patrick Fanning, President
Occidental Center for the Arts
3850 Doris Murphy Court
Occidental, CA 95465
cell: 707-478-5538

THIS EMAIL ORIGINATED OUTSIDE OF THE SONOMA COUNTY EMAIL SYSTEM.

Warning: If you don't know this email sender or the email is unexpected, **do not** click any web links, attachments, and **never** give out your user ID or password.

From: [Paula](#)
To: [Arielle Kubu-Jones](#); [Andrea Krout](#); [district3](#); [Jenny Chamberlain](#); [district5](#); [Cannabis](#)
Subject: Cannabis Ordinance BOS 5/18/21
Date: Tuesday, May 4, 2021 4:45:08 PM

EXTERNAL

Dear Supervisors:

I have been closely following the amendments and revisions to the cannabis ordinance for Sonoma County, have read the letters in the newspapers and the information and analysis from neighborhood groups.

I'm unhappy that the County has not reached out to residents and has been influenced too much by the industry in the drafting. I have come to the conclusion that the Subsequent Mitigated Declaration is fatally flawed and unfixable.

[It is time to return to the Board's earlier decision to do a project-wide EIR for Phase 2.](#) Sonoma County needs an EIR, one which will protect our natural resources, will comply with CEQA requirements and at the same time give residents a right to their health, safety and peaceful enjoyment of their properties.

Thank you for your attention to the concerns of Sonoma County residents regarding the request for a project-wide EIR for Phase 2.

Paula Romich
Sebastopol resident for 47 years

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do not click any web links, attachments, and **never** give out your user ID or password.

From: [Patti Sinclair](#)
To: [Andrea Krout](#); [Arielle Kubu-Jones](#); [district3](#); [district5](#); [Cannabis](#); jchamber@sonoma-county.org
Subject: Cannabis Ordinance BOS 5/18/21
Date: Tuesday, May 4, 2021 4:01:54 PM

EXTERNAL

Dear Supervisors:

I have been closely following the amendments and revisions to the cannabis ordinance for Sonoma County, have read the letters in the newspapers and the information and analysis from neighborhood groups. I'm unhappy that the County has not reached out to residents and has been influenced too much by the industry in the drafting. I have come to the conclusion that the Subsequent Mitigated Declaration is fatally flawed and unfixable. It is time to return to the Board's earlier decision to do a project-wide EIR for Phase 2. Sonoma County needs an EIR, one which will protect our natural resources, will comply with CEQA requirements and at the same time give residents a right to their health, safety and peaceful enjoyment of their properties.

Thank you,

Patricia Sinclair

Guerneville, Ca

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Warning: If you don't know this email sender or the email is unexpected, **do not** click any web links, attachments, and **never** give out your user ID or password.

From: [Robert Brent](#)
To: [Cannabis](#)
Subject: Cannabis Ordinance BOS 5/18/21
Date: Tuesday, May 4, 2021 3:11:41 PM

EXTERNAL

Dear Supervisors:

I have been closely following the amendments and revisions to the cannabis ordinance for Sonoma County, have read the letters in the newspapers and the information and analysis from neighborhood groups. I'm unhappy that the County has not reached out to residents and has been influenced too much by the industry in the drafting. I have come to the conclusion that the Subsequent Mitigated Declaration is fatally flawed and unfixable. It is time to return to the Board's earlier decision to do a project-wide EIR for Phase 2. Sonoma County needs an EIR, one which will protect our natural resources, will comply with CEQA requirements and at the same time give residents a right to their health, safety and peaceful enjoyment of their properties.

Robert Brent
Sebastopol

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Warning: If you don't know this email sender or the email is unexpected, **do not** click any web links, attachments, and **never** give out your user ID or password.

From: [Roger House](#)
To: [Cannabis](#)
Subject: Cannabis Ordinance BOS 5/18/21
Date: Tuesday, May 4, 2021 4:52:43 PM

EXTERNAL

Dear Supervisors:

I have been closely following the amendments and revisions to the cannabis ordinance for Sonoma County, have read the letters in the newspapers and the information and analysis from neighborhood groups. I'm unhappy that the County has not reached out to residents and has been influenced too much by the industry in the drafting. I have come to the conclusion that the Subsequent Mitigated Declaration is fatally flawed and unfixable. It is time to return to the Board's earlier decision to do a project-wide EIR for Phase 2. Sonoma County needs an EIR, one which will protect our natural resources, will comply with CEQA requirements and at the same time give residents a right to their health, safety and peaceful enjoyment of their properties.

Roger House
Occidental

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From: [Rich Wolf](#)
To: [Cannabis](#)
Subject: Fwd: Cannabis Ordinance BOS 5/18/21
Date: Tuesday, May 4, 2021 3:20:24 PM

EXTERNAL

Dear Supervisors,

I have been closely following the amendments and revisions to the cannabis ordinance for Sonoma County, have read the letters in the newspapers and the information and analysis from neighborhood groups. I'm unhappy that the County has not reached out to residents and has been influenced too much by the industry in the drafting. I have come to the conclusion that the Subsequent Mitigated Declaration is fatally flawed and unfixable. It is time to return to the Board's earlier decision to do a project-wide EIR for Phase 2. Sonoma County needs an EIR, one which will protect our natural resources, will comply with CEQA requirements and at the same time give residents a right to their health, safety and peaceful enjoyment of their properties.

Richard Wolf
Graton

Sent from my iPad

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Warning: If you don't know this email sender or the email is unexpected, **do not** click any web links, attachments, and **never** give out your user ID or password.

From: [Stephanie Eddy](#)
To: [Cannabis](#)
Subject: Fwd: Cannabis Ordinance BOS 5/18/21
Date: Tuesday, May 4, 2021 3:33:26 PM

EXTERNAL

Stephanie Eddy

----- Original Message -----

Subject:Cannabis Ordinance BOS 5/18/21
Date:2021-05-04 14:37
From:Stephanie Eddy <calliope@sonic.net>
To:Arielle.Kubu-Jones@sonoma-county.org, "Arielle.Kubu-Jones@sonoma-county.org:" <District3@sonoma-county.org>, "jchamber@sonoma-county.org:" <District5@sonoma-county.org>

Dear Supervisors:

I have been closely following the amendments and revisions to the cannabis ordinance for Sonoma County, have read the letters in the newspapers and the information and analysis from neighborhood groups. I'm unhappy that the County has not reached out to residents and has been influenced too much by the industry in the drafting. I have come to the conclusion that the Subsequent Mitigated Declaration is fatally flawed and unfixable. It is time to return to the Board's earlier decision to do a project-wide EIR for Phase 2. Sonoma County needs an EIR, one which will protect our natural resources, will comply with CEQA requirements and at the same time give residents a right to their health, safety and peaceful enjoyment of their properties.

Stephanie Eddy

3710 Wallace Road

Santa Rosa, CA 95404

--
Stephanie Eddy

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Warning: If you don't know this email sender or the email is unexpected, **do not** click any web links, attachments, and **never** give out your user ID or password.

From: [Suze Cohan](#)
To: [Cannabis](#)
Subject: Fw: Cannabis Ordinance BOS 5/18/2021
Date: Tuesday, May 4, 2021 4:40:19 PM

EXTERNAL

----- Forwarded Message -----

From: Suze Cohan <cohanhaven@yahoo.com>
To: Arielle.Kubu-Jones@sonoma-county.org <arielle.kubu-jones@sonoma-county.org>;
Andrea.Krout@sonoma-county.org <andrea.krout@sonoma-county.org>; District3@sonoma-county.org
<district3@sonoma-county.org>; District5@sonoma-county.org <district5@sonoma-county.org>;
jchamber@sonoma-county.org <jchamber@sonoma-county.org>
Sent: Tuesday, May 4, 2021, 11:34:50 AM PDT
Subject: Cannabis Ordinance BOS 5/18/2021

Dear Supervisors:

I have been closely following the amendments and revisions to the cannabis ordinance for Sonoma County, have read the letters in the newspapers and the information and analysis from neighborhood groups. I'm unhappy that the County has not reached out to residents and has been influenced too much by the industry in the drafting. I have come to the conclusion that the Subsequent Mitigated Declaration is fatally flawed and unfixable. It is time to return to the Board's earlier decision to do a project-wide EIR for Phase 2. Sonoma County needs an EIR, one which will protect our natural resources, will comply with CEQA requirements and at the same time give residents a right to their health, safety and peaceful enjoyment of their properties.

Susan Pringle-Cohan
Sebastopol, 95472

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From: diogi5@mindspring.com
To: [Cannabis](#)
Subject: Fw: Cannabis Ordinance BOS 5/18/21
Date: Tuesday, May 4, 2021 4:34:28 PM

EXTERNAL

-----Forwarded Message-----

From: diogi5@mindspring.com
Sent: May 4, 2021 12:16 PM
To: Arielle.Kubu-Jones@sonoma-county.org, Andrea.Krout@sonoma-county.org,
District3@sonoma-county.org, jchamber@sonoma-county.org, District5@sonoma-county.org
Cc: "elkgirl@me.com"
Subject: Cannabis Ordinance BOS 5/18/21

Dear Supervisors:

I have been closely following the amendments and revisions to the cannabis ordinance for Sonoma County, have read the letters in the newspapers and the information and analysis from neighborhood groups. I'm unhappy that the County has not reached out to residents and has been influenced too much by the industry in the drafting. I have come to the conclusion that the Subsequent Mitigated Declaration is fatally flawed and unfixable. It is time to return to the Board's earlier decision to do a project-wide EIR for Phase 2. Sonoma County needs an EIR, one which will protect our natural resources, will comply with CEQA requirements and at the same time give residents a right to their health, safety and peaceful enjoyment of their properties.

Toney & Nancy Prussiamerritt
Healdsburg, CA

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From: [Joe](#)
To: [Cannabis](#)
Subject: Cannabis Ordinance BOS 5/18/21
Date: Tuesday, May 4, 2021 7:57:52 PM

EXTERNAL

Dear Supervisors:

We have been closely following the amendments and revisions to the cannabis ordinance for Sonoma County, have read the letters in the newspapers and the information and analysis from neighborhood groups. I'm unhappy that the County has not reached out to residents and has been influenced too much by the industry in the drafting. I have come to the conclusion that the Subsequent Mitigated Declaration is fatally flawed and unfixable. It is time to return to the Board's earlier decision to do a project-wide EIR for Phase 2. Sonoma County needs an EIR, one which will protect our natural resources, will comply with CEQA requirements and at the same time give residents a right to their health, safety and peaceful enjoyment of their properties.

Theresa Beldon and Joe Pereira
Sebastopol

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From: [Tim Vogel](#)
To: [Arielle Kubu-Jones](#); [Andrea Krout](#); [district3](#); [Jenny Chamberlain](#); [district5](#); [Cannabis](#)
Subject: Cannabis Ordinance BOS 5/18/21
Date: Tuesday, May 4, 2021 9:43:38 PM

EXTERNAL

Dear Supervisors:

I have been closely following the amendments and revisions to the cannabis ordinance for Sonoma County, have read the letters in the newspapers and the information and analysis from neighborhood groups. I'm unhappy that the County has not reached out to residents and has been influenced too much by the industry in the drafting. I have come to the conclusion that the Subsequent Mitigated Declaration is fatally flawed and unfixable. It is time to return to the Board's earlier decision to do a project-wide EIR for Phase 2. Sonoma County needs an EIR, one which will protect our natural resources, will comply with CEQA requirements and at the same time give residents a right to their health, safety and peaceful enjoyment of their properties.

This is a beautiful area and the natural resources need to be protected and considered. If you ignore us, than you are completely failing your constituency and the generations of people that call this place home.

Money cannot always be the reason for making decisions. Please make the right choice and reconsider.

We are all watching and praying you do the RIGHT thing for the people that elect you.

Sincerely,

Tim Vogel (homeowner and voter)
415-505-6421
Sebastopol West County

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From: [Arielle Kubu-Jones](#)
To: [Cannabis](#)
Subject: FW: Cannabis Ordinance BOS 5/18/21
Date: Wednesday, May 5, 2021 10:12:05 AM

From: Brendan Smith <bds@oberondesign.com>
Sent: Tuesday, May 4, 2021 7:02 PM
To: Arielle Kubu-Jones <Arielle.Kubu-Jones@sonoma-county.org>; Andrea Krout <Andrea.Krout@sonoma-county.org>; district3 <district3@sonoma-county.org>; Jenny Chamberlain <jchamber@sonoma-county.org>; district5 <district5@sonoma-county.org>
Subject: Cannabis Ordinance BOS 5/18/21

EXTERNAL

No to big money monoculture and water sucking smelly pot farms!!

Dear Supervisors:

I have been closely following the amendments and revisions to the cannabis ordinance for Sonoma County, have read the letters in the newspapers and the information and analysis from neighborhood groups. I'm unhappy that the County has not reached out to residents and has been influenced too much by the industry in the drafting. I have come to the conclusion that the Subsequent Mitigated Declaration is fatally flawed and unfixable. It is time to return to the Board's earlier decision to do a project-wide EIR for Phase 2. Sonoma County needs an EIR, one which will protect our natural resources, will comply with CEQA requirements and at the same time give residents a right to their health, safety and peaceful enjoyment of their properties.

Brendan Smith and Elizebeth Herron

10964 Barnett Valley Rd. Sebastopol California

“Whether we and our politicians know it or not, nature is party to all our deals and decisions, and she has more votes, a longer memory and a sterner sense of justice than we do“
Wendell Berry.....

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From: [BOS](#)
To: [Cannabis](#)
Subject: FW: Issue: Cannabis growing in Rural Residential Zones
Date: Wednesday, May 5, 2021 8:52:44 AM

-----Original Message-----

From: no-reply@sonoma-county.org <no-reply@sonoma-county.org>
Sent: Tuesday, May 4, 2021 9:27 PM
To: BOS <BOS@sonoma-county.org>
Subject: Issue: Cannabis growing in Rural Residential Zones

Sent To: County of Sonoma

Topic: Issue

Subject: Cannabis growing in Rural Residential Zones

Message: Please advise as to your position and just ovation with respect to voting “for” or “against” the currently proposal to open cannabis grows in RR zones without public comment.

We have lived at 5321 Wilshire Dr, Santa Rosa , 95404 - a RR zoned parcel for more than 35 years. Such a grow on a parcel less than 10 acres AND not in a commercially zoned area without public review and input is not acceptable.

Thank you for your time and in advance for your prompt reply.

Cal Lewis
(707)528-9617

Sender's Name: cal Lewis
Sender's Email: clewis1828@hotmail.com
Sender's Cell Phone: 7075289617
Sender's Address:
P.O. Box 450
Fulton, CA 95439

From: [Arielle Kubu-Jones](#)
To: [Cannabis](#)
Subject: FW: Cannabis Ordinance BOS 5/18/21
Date: Wednesday, May 5, 2021 9:50:53 AM

From: Charmaine Stainbrook <mainstay@sonic.net>
Sent: Tuesday, May 4, 2021 10:30 PM
To: Arielle Kubu-Jones <Arielle.Kubu-Jones@sonoma-county.org>; Andrea Krout <Andrea.Krout@sonoma-county.org>; district3 <district3@sonoma-county.org>; Jenny Chamberlain <jchamber@sonoma-county.org>; district5 <district5@sonoma-county.org>
Subject: Cannabis Ordinance BOS 5/18/21

EXTERNAL

Dear Supervisors:

I'm unhappy that the County has not reached out to residents and has been influenced too much by the cannabis industry in the drafting of the new cannabis ordinance. It is time to return to the Board's earlier decision to do a project-wide Environmental Impact Report (EIR) before adopting a flawed ordinance. Sonoma County needs an EIR, one which will protect our natural resources (including our ground water), will comply with State CEQA requirements and at the same time give residents a right to their health, safety and peaceful enjoyment of their properties.

Charmaine Stainbrook - Sebastopol, CA.

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From: commander1566@hughes.net
To: [Cannabis](#)
Subject: Letter
Date: Wednesday, May 5, 2021 3:55:44 PM

EXTERNAL

Dear Supervisors:

I'm unhappy that the County has not reached out to residents and has been influenced too much by the cannabis industry in the drafting of the new cannabis ordinance. It is time to return to the Board's earlier decision to do a project-wide Environmental Impact Report (EIR) before adopting a flawed ordinance. Sonoma County needs an EIR, one which will protect our natural resources (including our ground water), will comply with State CEQA requirements and at the same time give residents a right to their health, safety and peaceful enjoyment of their properties.

Penngrove

Sent from my iPhone

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From: [Arielle Kubu-Jones](#)
To: [Cannabis](#)
Subject: FW: Cannabis Ordinance BOS 5/18/21
Date: Wednesday, May 5, 2021 5:09:54 PM

From: Dawn Usher <dmu813@gmail.com>
Sent: Wednesday, May 5, 2021 4:52 PM
To: Arielle Kubu-Jones <Arielle.Kubu-Jones@sonoma-county.org>; Andrea Krout <Andrea.Krout@sonoma-county.org>; district3 <district3@sonoma-county.org>; Jenny Chamberlain <jchamber@sonoma-county.org>; district5 <district5@sonoma-county.org>
Subject: Cannabis Ordinance BOS 5/18/21

EXTERNAL

Dear Supervisors:

I'm unhappy that the County has not reached out to residents and has been influenced too much by the cannabis industry in the drafting of the new cannabis ordinance. It is time to return to the Board's earlier decision to do a project-wide Environmental Impact Report (EIR) before adopting a flawed ordinance. Sonoma County needs an EIR, one which will protect our natural resources (including our ground water), will comply with State CEQA requirements and at the same time give residents a right to their health, safety and peaceful enjoyment of their properties. ***I can't understand why residents are told to conserve water, yet growing cannabis, which is not a necessity of life, will use enormous volumes of water, is even being considered. Water is essential to all living things and should not be used for anything but maintaining the health & vitality of our community. Please, please look beyond the money this industry would bring in, and look at the long term health and viability of the people who voted for you.***

***Thank you for your time,
Dawn Usher
Sebastopol***

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From: [Eliot Enriquez](#)
To: [Arielle Kubu-Jones](#); [Andrea Krout](#); [district3](#); [Jenny Chamberlain](#); [district5](#); [Cannabis](#)
Subject: Cannabis Ordinance BOS 5/18/21
Date: Wednesday, May 5, 2021 11:34:23 AM

EXTERNAL

Dear Supervisors:

I have been closely following the amendments and revisions to the cannabis ordinance for Sonoma County, have read the letters in the newspapers and the information and analysis from neighborhood groups. I'm unhappy that the County has not reached out to residents and has been influenced too much by the industry in the drafting. I have come to the conclusion that the Subsequent Mitigated Declaration is fatally flawed and unfixable. It is time to return to the Board's earlier decision to do a project-wide EIR for Phase 2. Sonoma County needs an EIR, one which will protect our natural resources, will comply with CEQA requirements and at the same time give residents a right to their health, safety and peaceful enjoyment of their properties.

Eliot Enriquez, Graton

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From: [Arielle Kubu-Jones](mailto:Arielle.Kubu-Jones)
To: [Cannabis](#)
Subject: FW: Bloomfield
Date: Wednesday, May 5, 2021 9:50:32 AM

From: Karen Murphy-Day <kmichelemurph@gmail.com>
Sent: Wednesday, May 5, 2021 3:55 AM
To: Arielle Kubu-Jones <Arielle.Kubu-Jones@sonoma-county.org>
Subject: Bloomfield

EXTERNAL

Dear Supervisors:

I have lived in Bloomfield since 1976, at 6647 Church Street. My childhood home now belongs to my brother and I. I hope the county listens to our pleas. As many other communities will be hoping we prevail with your good sense.

I have been closely following the amendments and revisions to the cannabis ordinance for Sonoma County, have read the letters in the newspapers and the information and analysis from neighborhood groups. I'm unhappy that the County has not reached out to residents and has been influenced too much by the industry in the drafting. I have come to the conclusion that the Subsequent Mitigated Declaration is fatally flawed and unfixable. It is time to return to the Board's earlier decision to do a project-wide EIR for Phase 2. Sonoma County needs an EIR, one which will protect our natural resources, will comply with CEQA requirements and at the same time give residents a right to their health, safety and peaceful enjoyment of their properties.

Sincerely,

Karen Murphy-Day
6647 Church Street
Bloomfield, California
94952

--

Karen Murphy-Day
20 Red Barn Road Brightlingsea Colchester CO7 0SH
01144(0)07984926886

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From: [Rachel Zierdt](#)
To: [Cannabis](#)
Subject: Cannabis Ordinance BOS 5/18/21
Date: Wednesday, May 5, 2021 5:49:01 AM

EXTERNAL

Dear Supervisors:

I have been closely following the amendments and revisions to the cannabis ordinance for Sonoma County, have read the letters in the newspapers and the information and analysis from neighborhood groups. I'm unhappy that the County has not reached out to residents and has been influenced too much by the industry in the drafting. I have come to the conclusion that the Subsequent Mitigated Declaration is fatally flawed and unfixable. It is time to return to the Board's earlier decision to do a project-wide EIR for Phase 2. Sonoma County needs an EIR, one which will protect our natural resources, will comply with CEQA requirements and at the same time give residents a right to their health, safety and peaceful enjoyment of their properties.

Rachel and Gene Zierdt, Sebastopol

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From: [Arielle Kubu-Jones](#)
To: ["bspiri@aol.com"](mailto:bspiri@aol.com)
Cc: [Cannabis](#)
Subject: RE: CANNABIS ORDINACE Subject BOS 5/18/21
Date: Wednesday, May 5, 2021 10:18:22 AM
Attachments: [image002.png](#)
[image003.png](#)
[image004.png](#)

Hello Roger,

On behalf of Supervisor Gorin, thank you for writing. I am sharing your comments with our Cannabis team.

[Arielle Kubu-Jones](#)

District Director

Supervisor Susan Gorin

First Supervisorial District

County of Sonoma

575 Administration Drive, Room 100A

Santa Rosa, CA 95403

707.565.2241

arielle.kubu-jones@sonoma-county.org

[For what's open in Sonoma County, industry best management plans and more, visit SoCoLaunch](#)

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Click the image below, or download the free **SoCo Report It** app on your device's app store.



First District Municipal Advisory Councils

Click logo for more information



From: bspiri@aol.com <bspiri@aol.com>
Sent: Tuesday, May 4, 2021 10:13 PM
To: Arielle Kubu-Jones <Arielle.Kubu-Jones@sonoma-county.org>
Subject: CANNABIS ORDINACE Subject BOS 5/18/21

EXTERNAL

Dear Supervisors:

I have been closely following the amendments and revisions to the cannabis ordinance for Sonoma County, have read the letters in the newspapers and the information and analysis from neighborhood groups. I'm unhappy that the County has not reached out to residents and has been influenced too much by the industry in the drafting. I have come to the conclusion that the Subsequent Mitigated Declaration is fatally flawed and unfixable. It is time to return to the Board's earlier decision to do a project-wide EIR for Phase 2. Sonoma County needs an EIR, one which will protect our natural resources, will comply with CEQA requirements and at the same time give residents a right to their health, safety and peaceful enjoyment of their properties.

Roger Spiridonoff
Santa Rosa, CA

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From: 97bee254@gmail.com
To: [Arielle Kubu-Jones](#); [Andrea Krout](#); [district3](#); [Jenny Chamberlain](#); [district5](#); [Cannabis](#)
Subject: Cannabis Ordinance BOS 5/18/21
Date: Wednesday, May 5, 2021 8:04:59 AM

EXTERNAL

Dear Supervisors:

I have been closely following the amendments and revisions to the cannabis ordinance for Sonoma County, have read the letters in the newspapers and the information and analysis from neighborhood groups. I'm unhappy that the County has not reached out to residents and has been influenced too much by the industry in the drafting. I have come to the conclusion that the Subsequent Mitigated Declaration is fatally flawed and unfixable. It is time to return to the Board's earlier decision to do a project-wide EIR for Phase 2. Sonoma County needs an EIR, one which will protect our natural resources, will comply with CEQA requirements and at the same time give residents a right to their health, safety and peaceful enjoyment of their properties.

Susan Hirsch
Guerneville

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From: [Arielle Kubu-Jones](#)
To: [Cannabis](#)
Subject: FW: water use in Sonoma County
Date: Wednesday, May 5, 2021 10:11:42 AM

From: Tim Lynch <rockon@comcast.net>
Sent: Tuesday, May 4, 2021 9:00 PM
To: Arielle Kubu-Jones <Arielle.Kubu-Jones@sonoma-county.org>
Subject: water use in Sonoma County

EXTERNAL

Dear Supervisors:

I have been closely following the amendments and revisions to the cannabis ordinance for Sonoma County, have read the letters in the newspapers and the information and analysis from neighborhood groups. I'm unhappy that the County has not reached out to residents and has been influenced too much by the industry in the drafting. I have come to the conclusion that the Subsequent Mitigated Declaration is fatally flawed and unfixable. It is time to return to the Board's earlier decision to do a project-wide EIR for Phase 2. Sonoma County needs an EIR, one which will protect our natural resources, will comply with CEQA requirements and at the same time give residents a right to their health, safety and peaceful enjoyment of their properties.

Tim Lynch
Sebastopol

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