

**From:** [Patrick Rafferty](#)  
**To:** [BOS](#)  
**Subject:** Cannabis ordinance  
**Date:** Tuesday, October 21, 2025 2:42:59 PM

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EXTERNAL

Dear BOS,

As a homeowner in Bennett Valley I am alarmed and dismayed that county staff has taken such a pro cannabis stance. I view their proposals take the industry into consideration over the homeowners and residents.

I assume you already know the residents objections..the smell, the proximity to residential areas, the minimal setbacks, the potential for crime as it's an all cash business, the water consumption, and the over development of grows in general have caused the market to tank, the lack of resources to enforce any regulations, the general free rein to have events..the list goes on.

It will be more difficult to modify your house in Sonoma County than it will be to start a cannabis grow.

The current tax roles from these businesses do not create a positive cash flow for the county.

Why then is the county rolling out the red carpet for grows? As a homeowner, I do not support the EIR or the BOD's approval of the proposed lax regulations.

Sincerely,

Patrick Rafferty

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**From:** [Anne Seeley](#)  
**To:** [BOS](#)  
**Subject:** Cannabis Policy FEIR  
**Date:** Monday, October 20, 2025 11:27:10 PM

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Dear Supervisors:

I cannot believe that this FEIR is being forwarded to you for approval.

It is so flawed, so inadequate, that you should be alarmed at the prospect of this EIR enabling a new policy which endangers public health.

I know that you likely are reluctant to restart this process, but that needs doing.

Please tell me: did you read the information offered by the Neighborhood Coalition? There was valuable information that should not be ignored.

Please do what is right for the residents of Sonoma County neighborhoods and:

- 1) Vote against certification of the FEIR;
- 2). Vote against accepting the newly written cannabis as law, and;
- 3) Vote to assemble a working group that includes the Neighborhood Coalition to take a new look at reforming the current policy.

Thank you!

Anne Seeley

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**From:** [perryj4@comcast.net](mailto:perryj4@comcast.net)  
**To:** [BOS](#)  
**Subject:** Flawed Final Environmental Impact Statement. RE Cannabis Hearing  
**Date:** Tuesday, October 21, 2025 1:21:57 PM

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Supervisors please reject the highly-flawed Final Environmental Impact Statement.

Thank You

Joseph Perry

707-477-3862

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**From:** [Susan Kinder](#)  
**To:** [district5](#); [Chris Coursey](#); [David Rabbitt](#); [district4](#); [BOS](#)  
**Subject:** Request to remove Grandfathering provision  
**Date:** Monday, October 20, 2025 4:01:19 PM

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To the Sonoma County Board of Supervisors:

I understand that at the October 28 BOS meeting, you will be discussing the new Environmental Impact Report in anticipation of updating the County cannabis ordinance. I thank you for the care and good judgement you exercise in our County government and the ongoing development of this ordinance is an example of that care.

I live in the neighborhood of 2750 Burnside Road, the location for a permit application for a cannabis operation. At this time, the application is under review and has not been approved. At the time, there is a formal appeal to the application outstanding from our neighborhood organization.

Along with my neighbors, I understand that Permit Sonoma has proposed that current applications which have been received, but not approved, be grandfathered under the current ordinance. This is not appropriate - at this point, the named Application is not approved or vested, no significant sums have been spent by the applicant, and a formal appeal is pending .

Please do not allow the pending application to be grandfathered to the current ordinance. County residents in the neighborhood deserve to have the protections and protocols of the new ordinance in place when the appeal is reviewed.

Thank you very much for reading this letter. I really appreciate your efforts to continue to bring good government to the emerging cannabis industry in our County.

Susan Kinder  
District 5  
1580 West Sexton Road  
Sebastopol, CA

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**From:** [Liz Brock](#)  
**To:** [BOS](#)  
**Subject:** Cannabis  
**Date:** Monday, October 20, 2025 7:05:42 PM

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EXTERNAL

Sent from my iPhone

Dear Board pf Supervisors,  
These cannabis rules are still too lenient.  
I truly dislike the proposal of public consumption events on private property that will affect the safety of all neighbors and roadways.  
Stay at home if you want to be stoned.  
Sincerely, Liz Brock

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My name is Nancy Richardson.

My comments relate to the need for Supervisor Gore to recuse himself from any consideration of the Comprehensive Cannabis Program and related issues pending before the Board, and specifically those on the Board's October 28<sup>th</sup> calendar.

The basis for this request was outlined in a letter from Marsha Vas Dupre, Ph.D., directed to Supervisor Gore and to all the Supervisors on September 13<sup>th</sup>. That letter outlines the applicable Fair Political Practices Commission rules, the generally recognized rules of conflict of interest, and some of the financial contributions to Supervisor Gore from cannabis interests that give rise to a clear conflict of interest in his involvement in, or consideration of, the pending cannabis ordinances. In the interest of time, I am providing copies of that letter for each of you and one for the Board's official record along with my comments.

In addition to those conflict rules, the Levine Act restricts contributions to local officials from people and businesses who have a financial interest in matters pending before those officials. That Act includes county supervisors.

"Pending status" is defined as a proceeding on the agenda or when the official knows it is within the agency's jurisdiction and reasonably foreseeable to come before them.

Contributions of \$500 or more received within the last 12 months are covered. Those would include the contributions outlined in Dr. Dupre's letter. The contributions in question clearly came from parties, namely cannabis interests, to the proceedings.

The foregoing recusal requirements apply to Supervisor Gore and on that basis, he should recuse himself from these matters. Failure to do so would be legally and morally improper and would expose any relevant decisions to reversal on appeal.

Thank you.



**From:** Marsha Dupre <[marshad@sonic.net](mailto:marshad@sonic.net)>

**Sent:** Wednesday, October 1, 2025 3:21 PM

**To:** 'district4@sonomacounty.gov' <[district4@sonomacounty.gov](mailto:district4@sonomacounty.gov)>; Supv. James Gore  
([James.Gore@sonomacounty.gov](mailto:James.Gore@sonomacounty.gov)) <[James.Gore@sonomacounty.gov](mailto:James.Gore@sonomacounty.gov)>

**Cc:** Supv. Lynda Hopkins ([district5@sonoma-county.org](mailto:district5@sonoma-county.org)) <[district5@sonoma-county.org](mailto:district5@sonoma-county.org)>; Supv. Rebecca  
Hermosillo ([Rebecca.Hermosillo@sonoma-county.org](mailto:Rebecca.Hermosillo@sonoma-county.org)) <[Rebecca.Hermosillo@sonoma-county.org](mailto:Rebecca.Hermosillo@sonoma-county.org)>;  
Supv. Chris Coursey ([Chris.Coursey@sonoma-county.org](mailto:Chris.Coursey@sonoma-county.org)) <[Chris.Coursey@sonoma-county.org](mailto:Chris.Coursey@sonoma-county.org)>; Supv. -  
Son. Co. Bd. ([bos@sonoma-county.org](mailto:bos@sonoma-county.org)) <[bos@sonoma-county.org](mailto:bos@sonoma-county.org)>; Supv. David A. Rabbitt  
([David.Rabbitt@sonoma-county.org](mailto:David.Rabbitt@sonoma-county.org)) <[David.Rabbitt@sonoma-county.org](mailto:David.Rabbitt@sonoma-county.org)>

**Subject:** Supv. James Gore - Recusal

Attached is **Recusal** request. Pl. acknowledge receipt and requested action.  
Marsha

Marsha Vas Dupre, Ph.D.  
Former Santa Rosa City Council Vice Mayor, SRJC Trustee  
3515 Ridgeview Drive  
Santa Rosa, CA 95404  
707-528-7146





Dear Supervisor Gore:

I am a former Santa Rosa City Council Vice Mayor, SRJC Trustee, and Past President of the League of Women Voters for Sonoma County. With my history of public service, I am conversant with, and respectful of, the Fair Political Practices Commission (FPPC) rules as well as the generally recognized rules of conflict of interest. Based upon the FPPC rules and the absolute importance of avoiding any perceived conflicts of interest, I am requesting that you recuse yourself from any participation in, or consideration of the Sonoma County Comprehensive Cannabis Program Update currently set before the Board of Supervisors on October 28, 2025. This recusal request includes consideration or participation in any of the related issues including but not limited to certification of the Final Environmental Impact Report relating to the cannabis program, any related proposed amendments to the General Plan, and any related recommendations or proposed amendments to the County ordinance.

As you undoubtedly are aware, the FPPC rules mandate that a public official with a financial conflict of interest must publicly disclose the conflict and abstain from any participation in or attempt to influence a governmental decision. The law is intended to ensure impartial government decision-making. Under those rules, recusal is required when a conflict of interest requiring recusal exists when it is "reasonably foreseeable" that a governmental decision will have a "material financial effect" on one of the official's financial interests, in a way that is distinguishable from its effect on the public generally.

The FPPC identifies five categories of financial interests that can trigger a disqualifying conflict. Although I do not have access to every detail of your finances, public records suggest three of these categories apply to you:

- (1) Sources of income: \$500 or more in income received from a single source within the preceding 12 months;
- (2) Sources of gifts: Gifts worth \$630 or more from a single source within the preceding 12 months (updated as of January 1, 2025); and

- (3) Personal finances: A financial effect on the official's personal finances or their immediate family.

During 2025, you and your family have been inextricably intertwined with cannabis businesses. Thus far in 2025, records reflect you received contributions for your Senate campaign from the following cannabis businesses or business people:

- Genine Coleman \$500 (Origins Council)
- Erich Pearson \$5500 (SPARC)
- Albert Eaddy \$2000 (ASG North Bay)
- Sam Galford \$1,000 (Joy Ridge Farms)
- Robin Heckathorn \$1,000 (Joy Ridge Farms)

This may not be a complete list however the dollar amounts, above, are significant and each gift constitutes a gift triggering a disqualifying conflict.

Even more concerning, and underscoring the intent of those previous contributions, I am aware of your Senate fundraiser on September 13, 2025, hosted by The Sonoma County Cannabis Alliance. The promotional email "poster/ad" noted it was paid for by your campaign. The ad featured requested contribution levels of \$100 - \$5900. Beneath your ad, the Sonoma County Cannabis Alliance added the following:

"The Sonoma County Cannabis Alliance has been a dedicated voice for our industry – advocating for smarter regulations and building strong alliances. Now more than ever, we need policymakers who understand the realities of our work. James Gore is exactly that leader – someone who can cut through red tape and help California realize its full potential as a national model for cannabis and agriculture."

I am not aware of the amount of money paid to your campaign as a result of that September 13<sup>th</sup> event, but it's safe to assume it multiplied the triggering conflict events many-fold and made it clear in no uncertain terms that you will do all you can to support and promote cannabis and the moneys raised were intended specifically for that reason. With the pending Comprehensive Cannabis Program Update, the Final Environmental Impact Report, the proposed General Plan

amendment, and other related issues before the Board of Supervisors, those contributions and your unequivocal stated objectives as to cannabis legislation, it doesn't take a legal scholar to see your blatant conflict of interest in participating in the Board's deliberations and voting on that Update. Paraphrasing the traditional saying, "If it looks like a conflict and sounds like a conflict, it's a conflict." In this case, there is nothing remotely subtle about the invitation to give you money to ensure your pro-cannabis vote.

Referring again to the FPPC regulations and compounding your conflict further is the fact your sister-in-law, Erin Gore, is the CEO of Garden Society which advertises itself as a "premium craft cannabis brand and company" that operates in Sonoma County and whose business will be strongly affected by the Comprehensive Cannabis Program Update. The poster/ad for your September 13<sup>th</sup> fundraiser lists her as a member of the host committee. Clearly, her business is intertwined with your governmental position. She has a direct interest in the pending Comprehensive Cannabis Program Update and a direct line of communication to you. Her participation in your fund-raising with the Sonoma County Cannabis Alliance and your declared objective to promote cannabis confirms her actual influence in your decisions and your glaring conflict and need to recuse yourself from any consideration of the Comprehensive Cannabis Program Update, the FEIR, the proposed General Plan amendment, and any other related issues.

Referring back to the FPPC language, it is "reasonably foreseeable" that the governmental decision pending before the Board as to the Comprehensive Cannabis Program will have a "material financial effect" on your financial interests, in a way that is distinguishable from its effect on the public generally. Other people on the Board are not advertising themselves as advocates for cannabis and seeking financial contributions for that cause, thus you are readily distinguishable from the public generally and the Board, specifically on those financial contributions.

As important, it is reasonably foreseeable that your vote or participation in the voting process will be directly influenced by the contributions you have solicited and received from the cannabis industry, thereby consciously or unconsciously, directing your vote to promote that

industry and precluding any objective and balanced assessment of the issues. Accordingly, in the interests of guaranteeing a fair and transparent political process regarding the Board's consideration of the Comprehensive Cannabis Program and in accordance with California law, it is imperative that you immediately announce your recusal and take all appropriate steps to insulate yourself from the discussion of the issues and from any voting related to them. Please note California Government Code Section 87105 and FPPC Regulation 18707 also mandate that you refrain from any participation or attempt to influence the decision, "including behind-the-scenes" actions relating to that pending legislation.

Even if for technical reasons you can somehow assert that the FPPC Regulations do not apply to you in these circumstances, the public views you as having a blatant appearance of a conflict of interest. Your participation in deciding these important issues would undermine public confidence in impartial government decision-making and invites cynicism at a time when our democracy seems especially fragile.

For the foregoing reasons and as one who has served as a governmental official in various capacities, I respectfully ask and urge you to immediately go on record as recusing yourself from any consideration or voting by the Board in relation to the Comprehensive Cannabis Program, the FEIR, and the proposed General Plan amendment and to refrain from any behind-the-scenes lobbying or other participation in relation to that pending legislation.

Sincerely,

Marsha Vas Dupre, Ph.D.

**From:** [Moir Jacobs](#)  
**To:** [Rebecca Hermosillo](#); [Rebecca Hermosillo](#)  
**Cc:** [BOS](#); [Tim Freeman](#); [Ross Markey](#); [Scott Orr](#)  
**Subject:** Commercial Cannabis in Sonoma County  
**Date:** Wednesday, October 22, 2025 4:11:31 PM

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EXTERNAL

Good afternoon, Supervisor Hermosillo, and all Supervisors,

In less than one week you'll be voting on a new Cannabis Ordinance which could impact the lives of many thousands of rural Sonoma County residents very negatively. Please consider carefully how many of the proposed new rules are totally unacceptable to rural residents and for very good reasons. These reasons are precisely why Napa and Marin don't allow outdoor commercial cannabis operations sited anywhere near their rural residents, they are completely prohibited in both counties. Even Mendocino has far better protections for their residents than Sonoma County government's staff is proposing.

Why are Sonoma County rural residents not provided the same protections as Napa, Marin or Mendocino residents? Please think carefully about this question.

The Bennett Valley Community Association has communicated many times why we wish to prohibit commercial cannabis operations in Bennett Valley. By now you should understand our many concerns and why we interpret our Bennett Valley Area Plan (BVAP) as prohibiting this activity here. Do you completely disregard your residents' interpretation of the BVAP and only consider your unelected staff's various "workaround" policies to circumvent the BVAP and various State laws/regulations? If so, this is only setting yourselves and our County up for a continued conflict and failure.

I urge you to please at the very least insist on 1,000 ft setbacks from all rural residential parcels, increase minimum parcel size to 20 acres and prohibit any events or any commercial/retail sales in rural Sonoma County lands. No crop swaps nor ministerial permits without the public's review should be allowed.

If not protected by this new ordinance, Bennett Valley will most certainly push for the same consideration given to many communities in their request for exclusion zone status from vacation rentals, which has been granted many times.

We are a community of people with rights to live in peace and safety. We expect our County leaders to understand and respect this. We were promised "neighborhood compatibility" and we expect to be protected appropriately.

Thank you,  
Moir Jacobs  
President  
Bennett Valley Community Association  
[bennettvalley.org](http://bennettvalley.org)

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**From:** [Becky Bass](#)  
**To:** [Richard R. Rudnansky](#)  
**Cc:** [Cannabis](#); [Crystal Acker](#); [Rebecca Hermosillo](#); [Chris Coursey](#); [David Rabbitt](#); [Lynda Hopkins](#); [James Gore](#)  
**Subject:** Re: Board of Supervisor"s Meeting of October 28, 2025 / Comments Regarding Agenda item on the Cannabis Program Update  
**Date:** Thursday, October 23, 2025 5:52:27 PM

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Nice letter, Rich - thanks for sharing. Hope you can take a well-earned break from the topic until next Tuesday . See you at the supervisors' meeting!

BB  
Sent from my iPhone

On Oct 23, 2025, at 15:35, Richard R. Rudnansky <[rrudnansky@sonic.net](mailto:rrudnansky@sonic.net)> wrote:

**COMMENTS REGARDING THE CANNABIS PROGRAM UPDATE  
AGENDA ITEM FOR THE BOARD OF SUPERVISORS MEETING OF  
OCTOBER. 28, 2025**

Please include these comments below and attached in the public record for that meeting.

**INTRODUCTION**

The County has indicated that "...[t] overarching goal of the Cannabis Program Update is to expand opportunities for growth within the cannabis industry while balancing the need to increase neighborhood compatibility between cannabis uses and surround neighborhoods."

The draft ordinance clearly favors the cannabis industry and would allow for considerable expansion in ways that it utterly fails to adequately protect rural residents and meet the goal of increasing neighborhood compatibility with the cannabis industry. In addition, as pointed out by many comments (particularly the letter from the Shute Mihaly Weinberger law firm) the EAR is flawed.

The EIR, Draft Ordinance and Draft General Plan Amendments clearly favor the industry over the concerns of residents. As I read the materials, it appears that there at least 19 new beneficial provisions that favor the industry (many of which would negatively impact residents) and only one new proposed provision that would at least arguably protect residents.

Therefore, it appears to me that the proposed ordinance is overwhelmingly a pro-industry ordinance with little regard for the real concerns of the residents. My first question is WHY? Why it is a good idea to expand cannabis cultivation in

Sonoma County the way it is being proposed? Over the past many years, the cannabis ordinance and program have failed to bring in the revenue expected to support other programs as promised, is an economic failure for the County and has caused much tension with and adverse consequences to rural residents. In short it has been a failed experiment and some of the proposed ordinance provisions, if adopted, will only make matters worse.

Hopefully you will read all the comments provided by rural residents and others, including well-qualified experts and studies on both sides of the issues. On balance the problematic provisions, including those discussed in this comment, not only do little for neighborhood compatibility but would significantly aggravate and exacerbate the problem particularly when there are ways to minimize the problems and still allow for promotion of the industry in other ways.

**DISCUSSION:** Based on my reading and understanding of the materials here are my comments on certain provisions for your consideration:

**(1) SUPPORT FOR PROHIBITION ON COMMERCIAL CANNABIS CULTIVATION IN THE RURAL RESIDENTIAL ZONING DISTRICT:**

While I am pleased that the proposed update continues the prohibition of commercial cannabis cultivation in the Rural Residential Zoning District (RR), the zoning designation for our Bennett Ridge neighborhood, I am many of my neighbors have grave concerns about other aspects of the proposed update that would impact the County in general and our Bennett Ridge neighborhood, Bennett Valley and other rural residents in particular.

**(2) THE EIR IS FLAWED** Although an EIR may be a useful tool, if done correctly and in compliance with CEQA, this EIR appears to be flawed in several areas. As indicated in the letter from Shute, Mihaly & Weinberger Law Firm and others, there seems to be serious deficiencies and inaccuracies in the EIR which should be of concern to the County as well. At the end of the day, however, it will come down to policy decisions. Just because you may conclude and accept that something may be arguably or marginally appropriate under an EIR, that does not mean you have to implement it from a policy perspective. Given the number of mitigation measures that could be adopted, it appears to me that any Statement of Overriding Consideration, should one be adopted, would lack the necessary findings and should not be a backdoor way to justify some of the provision harmful to the County and its residents. In any event **I ask that you select Alternative #2 which would limit commercial cultivation to indoors and in the Commercial and Industrial Zoning Districts, which would eliminate most of the problems experienced by residents.** Economics have shown that indoor cultivation is more profitable thus leading to a better chance of profit by such operators and would not have the negative impacts on rural neighborhoods. **However, if you reject this request here are comments and requests on just some of the more problematic aspects of the proposed ordinance and general plan amendment.**

**(3) SPECIAL EVENTS:** Special events are proposed in the draft ordinance to promote cannabis. What can go wrong? The way this is presented in the draft ordinance is problematic in so many ways. It is hard to believe that this is even on the table. There can be promotion in many other ways that would at least limit the



negative impacts on residents and neighborhoods and at least be safer than what is being proposed. Such “events” can be limited in number, prohibit sales and consumption, and held at the Fairgrounds like the Emerald Cup or in commercial and industrial zoning districts. The key to safety is no consumption or sales at these “events”. On balance the detriment to residential neighbors and the public is so much greater if these promotional special events are allowed per the current provisions in the draft ordinance. **PLEASE VOTE NO**

**(4) DESIGNATION OF CANNABIS AS “CONTROLLED**

**AGRICULTURE”** Designating cannabis as controlled agriculture not only does not have a historical factual or legal basis for doing so. It is fiction. The EIR states that “...the extent to which cannabis is consider agricultural or whether cultivated cannabis is consider an agricultural product is unclear.” Why then would you want to advance this novel idea at this time? It would also bring in the Right to Farm laws and take away the right of a resident to challenge an operator when the adverse effects of their operation cause a nuisance. How is that protective of residents or achieve neighborhood compatibility? In addition, the California State Right to Farm ordinance exempts agriculture from being sued as a nuisance. Therefore, even if the County’s ordinance states that the Right to Farm does not apply to cannabis such a provision may at least raise a question whether such a provision would be inconsistent with State Law thus resulting in prohibiting residents from suing for nuisance. This proposal is troublesome and could lead to further erosion of protections for residents and other unintended consequences. **PLEASE VOTE NO**

**(5) SETBACKS:** Originally the proposed ordinance that went to the Planning Commission had required that there be a 600-foot setback between commercial cannabis cultivation and the Rural Residential Zoning Districts which is the district that our Bennett Ridge neighborhood is in. The Planning Commission is recommending that the setback to residential zoned properties be 1000 feet. In the materials for the October 28 meeting, although unclear, it appears that the recommendation has changed to a 1000-foot setback. This is certainly an improvement but based on your own EIR and based on studies and previous comments by rural residents that such odors can be detected as far as 2000 feet. (see the EIR and page 38 of the July 15, 2025 letter from the Shute, Mihaly, & Weinberger law Firm to Crystal Acker as well as other comments)) **Therefor this setback should be at a minimum 1000 feet as recommended by the Planning Commission and I ask that you consider setbacks up to 2000 feet from residential zoning districts.**

**(6) REDUCTION OF MINIMUM PARCEL SIZE FROM 10 ACRES TO 5 ACRES AND ELIMINATING THE ONE ACRE CULTIVATION CAP:**

**I** am opposed to reducing the minimum parcel size for commercial cultivation from the current 10 acres to only 5 acres. This would have significant impacts on residents and neighborhoods. This is clearly going the wrong way and, along with the proposed reduction of setbacks in certain zoning districts, will only exacerbate the adverse impacts to neighbors. The Planning Commission has

recommended that the minimum parcel size remain 10 acres. In the materials for the October 28 meeting, although unclear, it looks that the recommendation has changed to retaining the 10 acres minimum parcel size. There are thousands of

acres where cultivation can occur that would not be next to or near rural residents and neighborhoods. Why continue to insist on allowing for expansion of cultivation near residents and rural neighborhoods coupled with inadequate setbacks? There has been shown that there is not a shortage of supply of cannabis. Those who wish to engage in this activity can purchase weed without any cultivation or expansion of cultivation in Sonoma County. Given the odor and other issues affecting residents, not only should the 10-acre minimum remain but consideration should be given to increasing the parcel size more than 10 acres in certain areas where there are neighborhoods. **PLEASE VOTE TO AT THE VERY LEAST RETAIN THE 10 ACRES MINIMUM PARCEL SIZE AND CONSIDER INCREASING THE MINIMUM PARCEL SIZE IN CERTAIN AREAS.**

**(7) CROP SWAPS:** I am opposed to the provisions that would allow so called crops swaps given that it appears that such swaps can be done through a ministerial process without providing any meaningful environmental review and ability for neighbors to address issues regarding such swaps. Where did this idea come from? Switching from traditional crops to cannabis can increase water demand and would be contrary to many strict rules in place to protect local water resources and existing residences. Crop swapping could disrupt existing agricultural ecosystems and degrade soil quality affecting long-term sustainability. In addition, such a provision if adopted could bring commercial cannabis cultivation with all the demonstrated detrimental impacts on residents specific to cannabis as opposed to existing traditional agriculture that do not have the unique problems of cannabis. Again, if this is allowed, you will be bringing more commercial cannabis cultivation and potential nuisances to residents who, when purchasing their properties, were aware they were moving close to traditional agriculture but certainly did not expect to have commercial cannabis cultivation with all its negative and unique impacts and nuisance potential to later be allowed close to their homes. **PLEASE VOTE NO**

**(8) ODOR, HEALTH, AND SETBACKS** As noted in the EIR and previous comments to the Board and Planning Commission over the years, the odor from commercial cannabis cultivation has a significant adverse effect on resident's ability to live and enjoy their homes. For years residents have told you how the smell of cannabis operations have negatively impacted their lives. In addition, there are some questions whether such odors impart the carcinogenic beta myrcene which could affect residents' health. The EIR summarily dismisses studies and opinions from qualified experts regarding the potential carcinogenic impacts on residents. The EIR states that cannabis cultivation operations that do not include odor control systems even if limited to within a greenhouse have potential to generate objectionable odors causing nuisance to nearby receptors. It also states that cannabis odors may be recognizable or detectable approximately 2 miles away from a cannabis operation. The EIR then goes on to state that odors are significant yet unavoidable. Really? How about prohibiting future outdoor cultivation? How about imposing meaningful setbacks? How about requiring other meaningful mitigation measures. Any attempt to get around this issue but adopting a Statement of Overriding Consideration should not be made given the facts and potential mitigation measures that could be adopted. **Even if you think there is some uncertainty about these issues, please err on the side of caution**

**when determining appropriate setbacks to residences. Therefore, please require mitigation measures to cannabis cultivation sites and impose setbacks of at least 1000-feet (and preferably more) not only to residential zoning districts but to all residences (regardless of zoning districts).**

**CONCLUSION AND REQUEST.** Please consider all the adverse effects, health issues, social problems, odor, and economic failure for the County that cannabis is responsible for and consider that the neighboring counties of Marin and Napa have chosen to put the interests of its residents over the interests of a few in the industry. If you, after all of this, want to continue to allow commercial cannabis cultivation that you do so in a way that does not disproportionately and negatively impact residents, neighborhoods and the County in general. **Therefore, I merely ask that you analyze these issues objectively, bring balance to the issues and consider what's best for your resident constituents and the County in general.**

**This should not be an us vs. them thing, a generational thing, a political or ideological thing, but rather a commonsense thing. Even if there are controversy or different views on particulars, I urge that you show leadership, do the right thing and err on the side of caution and not continue to experiment with our beautiful County, our homes, our families and our lives.**

Respectively submitted.

Richard Rudnansky

Bennet Ridge Resident

<BOS Comments October 2025.docx>

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**From:** [Charles Desmarais](#)  
**To:** [Rebecca Hermosillo](#); BOS  
**Subject:** Please control cannabis better  
**Date:** Wednesday, October 22, 2025 10:07:23 AM

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The current cannabis proposal fails to address neighborhood compatibility.

The County's proposal allows vineyards and other genuine agricultural crops to be "swapped" for marijuana fields with no consideration of unhealthy air emissions, placement of ugly hoop houses (which will not undergo design review), water use, traffic, emergency evacuation, or other environmental issues. The California Department of Fish and Wildlife told the County that ministerial crop swaps would endanger our water supply and biotic resources, but Permit Sonoma ignored this trustee agency. The County proposes to issue ministerial permits for crop swaps that never expire. **There would be no opportunity for public input.** The County would lack authority to consider cumulative impacts even when permit after permit is issued for scores or hundreds of acres in Bennett Valley.

Charles Desmarais  
646-785-9812

6729 Enterprise Road  
Glen Ellen, CA 95442

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**From:** [Moir Jacobs](#)  
**To:** [Rebecca Hermosillo](#); [Rebecca Hermosillo](#); [BOS](#)  
**Subject:** We urge Supervisor Gore to recuse himself  
**Date:** Thursday, October 23, 2025 12:22:32 PM  
**Attachments:** [NC Recusal.pdf](#)

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Good afternoon, Supervisors,

The Bennett Valley Community Association fully supports the Neighborhood Coalition's request for Supervisor Gore's recusal attached.

"We urge Supervisor Gore to recuse himself from all aspects of the cannabis update, and urge that Supervisors Hopkins, Coursey, Rabbitt, and Hermosillo insist that he do so. His participation risks wasting the County's substantial investment in the ongoing CEQA process."

Thank you,  
Moir Jacobs  
President  
Bennett Valley Community Association

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October 23, 2025

## **Partial Recusal by Supervisor Gore is Too Little Too Late**

The Neighborhood Coalition advocates for sustainable, environmentally sound, and neighborhood-compatible cannabis policies in Sonoma County. A mere six days before the Board's long-scheduled October 28<sup>th</sup> hearing to consider the revised cannabis ordinance and related General Plan and ordinance amendments, the County's agenda included an obscure notation that Supervisor Gore will recuse himself from consideration of the dispensary provisions, a tiny piece of the pending cannabis proposals. This comes three weeks after the Supervisor Gore and the other supervisors were notified on October 1<sup>st</sup> by Dr. Dupre of serious concerns as to Supervisor Gore's involvement in the entire cannabis program modification, based upon multiple conflicts-of-interest as outlined in Dr. Dupre's letter which is in the record.

The conflict-of-interest provisions arise from the FPPC Rules and the Levine Act. In combination, they require the official to take the initiative when a conflict appears and to publicly disclose the conflict and abstain from any participation in or attempt to influence a governmental decision. The Levine Act covers "entitlements for land use" such as land use permits for dispensaries, cannabis cultivation, and events. [The Fair Political Practices Commission](#) states the Levine Act covers "rulemaking procedures affecting a particular industry where only a small number of businesses are affected." Here the rules affect a particular industry (cannabis) and only a small number businesses are affected in Sonoma County.

Supervisor Gore received \$5,500 from Erich Pearson, CEO of SPARC, whose company owns three dispensaries in Sonoma County. Pearson has lobbied the County to limit competition to SPARC by retaining the cap of nine dispensaries. SPARC also has an interest in not allowing farmstands, which also compete with dispensaries. SPARC's cannabis interests go far beyond dispensaries, including a cultivation site in Sonoma County. SPARC has lobbied the County to loosen the rules for cultivation, including expanded use of hoop houses, allowing hayfields to be eligible for crop swaps, and to allow cannabis events (FEIR 3-222 to 3-226; FEIR 3-382 to 3-383). Only about 12 acres of cannabis are cultivated on Sonoma County, and affect only a small number of cultivation businesses. Any claim that the Levine Act does not apply to Supervisor Gore in this entire proceeding is ridiculous. He received large donations (over \$500) from SPARC and many other cannabis businesses, some of which he has not yet publicly reported.

Supervisor Gore's late-recusal proposal comes long after his involvement and participation in cannabis proceedings that have been ongoing for months. During that time, he has actively sought donations from cannabis businesses by promising his advocacy of their

interests. There was nothing subtle about that objective in his campaign solicitations at a fundraiser on September 13<sup>th</sup> sponsored by The Sonoma County Cannabis Alliance.

Supervisor Gore's midnight hour partial recusal announcement did not arise from his own initiative but, rather, was clearly in response to Dr. Dupre's letter. It also reacted to public comments made before the Board on October 21, 2025, referencing Dr. Dupre's letter and demanding his recusal. But for those actions, there is no reason to believe Supervisor Gore would have addressed his multiple conflicts-of-interest nor the legal requirement that he recuse himself. To put it bluntly, his beyond-late attempt to minimally recuse himself reflects nothing more than a frantic scramble after being busted on his multiple violations of the FPPC rules and the Levine Act. Even now, he continues to minimize those violations by trying to keep his voting hand on the larger cannabis issues, issues which are completely intertwined with his pursuit of support from cannabis companies. This mandates recusal.

Supervisor Gore's attempt to limit his recusal insults the public and his fellow Supervisors. He has participated for months in discussions of the pending cannabis rules while seeking contributions from cannabis businesses by committing to vote in their favor. This is "pay to play," precisely to focus of the Levine Act. He even requested that Permit Sonoma hold the April 15 Workshop so he could perform on stage for his potential donors. His advocacy and fundraising were not limited to dispensaries. Dispensaries are, in fact, a minor issue in the scope of the pending cannabis proposals before the Board. He has been swimming in the cannabis waters and is tainted by the entire pool in which he's immersed himself. During that time the FPPC rules dictate it was his responsibility to declare his conflict and his need for the recusal. The absurdity of his attempt at a limited recusal is apparent to all. His efforts to evade the FPPC requirements and to dodge the provisions of the Levine Act offend the very purpose of those "pay to play" rules and laws. He is not even arguably in compliance with them. His ongoing involvement in any consideration, discussion, or voting on the pending cannabis issues before the Board sets up a solid basis for appeal and reversal of any issues in which he participated or voted.

We urge Supervisor Gore to recuse himself from all aspects of the cannabis update, and urge that Supervisors Hopkins, Coursey, Rabbitt, and Hermosillo insist that he do so. His participation risks wasting the County's substantial investment in the ongoing CEQA process.

Sincerely,

Neighborhood Coalition

Nancy and Brantly Richardson, Communications Directors  
SonomaNeighborhoodCoalition@gmail.com

**From:** [Neighborhood Coalition](#)  
**To:** [BOS](#); [James Gore](#); [David Rabbitt](#); [Chris Coursey](#); [Lynda Hopkins](#); [Rebecca Hermosillo](#)  
**Cc:** [Robert Pittman](#); [Scott Orr](#); [Murphy, Emma](#); [Endicott, Marisa](#)  
**Subject:** Partial Recusal by Supervisor Gore is Too Little Too Late  
**Date:** Thursday, October 23, 2025 11:57:31 AM  
**Attachments:** [NC Recusal.pdf](#)

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## EXTERNAL

Please see the attached request for Supervisor Gore to recuse himself from participating or voting on the cannabis update.

Neighborhood Coalition

Nancy and Brantly Richardson, Communications Directors  
[SonomaNeighborhoodCoalition@gmail.com](mailto:SonomaNeighborhoodCoalition@gmail.com)

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Sincerely,

Neighborhood Coalition

Nancy and Brantly Richardson, Communications Directors  
SonomaNeighborhoodCoalition@gmail.com

**From:** [Richard R. Rudnansky](#)  
**To:** [Cannabis](#); [Crystal Acker](#); [Rebecca Hermosillo](#); [Chris Coursey](#); [David Rabbitt](#); [Lynda Hopkins](#); [James Gore](#)  
**Subject:** Board of Supervisor's Meeting of October 28, 2025 / Comments Regarding Agenda item on the Cannabis Program Update  
**Date:** Thursday, October 23, 2025 3:38:46 PM  
**Attachments:** [BOS Comments October 2025.docx](#)

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## **COMMENTS REGARDING THE CANNABIS PROGRAM UPDATE AGENDA ITEM FOR THE BOARD OF SUPERVISORS MEETING OF OCTOBER. 28, 2025**

Please include these comments below and attached in the public record for that meeting.

### **INTRODUCTION**

The County has indicated that "...[t] overarching goal of the Cannabis Program Update is to expand opportunities for growth within the cannabis industry while balancing the need to increase neighborhood compatibility between cannabis uses and surround neighborhoods."

The draft ordinance clearly favors the cannabis industry and would allow for considerable expansion in ways that it utterly fails to adequately protect rural residents and meet the goal of increasing neighborhood compatibility with the cannabis industry. In addition, as pointed out by many comments (particularly the letter from the Shute Mihaly Weinberger law firm) the EAR is flawed.

The EIR, Draft Ordinance and Draft General Plan Amendments clearly favor the industry over the concerns of residents. As I read the materials, it appears that there at least 19 new beneficial provisions that favor the industry (many of which would negatively impact residents) and only one new proposed provision that would at least arguably protect residents.

Therefore, it appears to me that the proposed ordinance is overwhelmingly a pro-industry ordinance with little regard for the real concerns of the residents. My first question is WHY? Why it is a good idea to expand cannabis cultivation in Sonoma County the way it is being proposed? Over the past many years, the cannabis ordinance and program have failed to bring in the revenue expected to support other programs as promised, is an economic failure for the County and has caused much tension with and adverse consequences to rural residents. In short it has been a failed experiment and some of the proposed ordinance provisions, if adopted, will only make matters worse.

Hopefully you will read all the comments provided by rural residents and others, including well-qualified experts and studies on both sides of the issues. On balance the problematic provisions, including those discussed in this comment, not only do little for neighborhood compatibility but would significantly aggravate and exacerbate the problem particularly when there are ways to minimize the problems and still allow for promotion of the industry in other ways.

**DISCUSSION:** Based on my reading and understanding of the materials here are my comments on certain provisions for your consideration:

### **(1) SUPPORT FOR PROHIBITION ON COMMERCIAL CANNABIS CULTIVATION IN THE RURAL RESIDENTIAL ZONING DISTRICT:**

While I am pleased that the proposed update continues the prohibition of commercial cannabis cultivation in the Rural Residential Zoning District (RR), the zoning designation for our Bennett Ridge neighborhood, I am many of my neighbors have grave concerns about other aspects of the proposed update that would impact the County in general and our Bennett Ridge neighborhood, Bennett Valley and other rural residents in particular.

**(2) THE EIR IS FLAWED** Although an EIR may be a useful tool, if done correctly and in compliance with CEQA, this EIR appears to be flawed in several areas. As indicated in the letter from Shute, Mihaly & Weinberger Law Firm and others, there seems to be serious deficiencies and inaccuracies in the EIR which should be of concern to the County as well. At the end of the day, however, it will come down to

policy decisions. Just because you may conclude and accept that something may be arguably or marginally appropriate under an EIR, that does not mean you have to implement it from a policy perspective. Given the number of mitigation measures that could be adopted, it appears to me that any Statement of Overriding Consideration, should one be adopted, would lack the necessary findings and should not be a backdoor way to justify some of the provision harmful to the County and its residents. In any event **I ask that you select Alternative #2 which would limit commercial cultivation to indoors and in the Commercial and Industrial Zoning Districts, which would eliminate most of the problems experienced by residents.** Economics have shown that indoor cultivation is more profitable thus leading to a better chance of profit by such operators and would not have the negative impacts on rural neighborhoods. **However, if you reject this request here are comments and requests on just some of the more problematic aspects of the proposed ordinance and general plan amendment.**

**(3) SPECIAL EVENTS:** Special events are proposed in the draft ordinance to promote cannabis. What can go wrong? The way this is presented in the draft ordinance is problematic in so many ways. It is hard to believe that this is even on the table. There can be promotion in many other ways that would at least limit the negative impacts on residents and neighborhoods and at least be safer than what is being proposed. Such “events” can be limited in number, prohibit sales and consumption, and held at the Fairgrounds like the Emerald Cup or in commercial and industrial zoning districts. The key to safety is no consumption or sales at these “events”. On balance the detriment to residential neighbors and the public is so much greater if these promotional special events are allowed per the current provisions in the draft ordinance. **PLEASE VOTE NO**

**(4) DESIGNATION OF CANNABIS AS “CONTROLLED AGRICULTURE”** Designating cannabis as controlled agriculture not only does not have a historical factual or legal basis for doing so. It is fiction. The EIR states that “...the extent to which cannabis is consider agricultural or whether cultivated cannabis is consider an agricultural product is unclear.” Why then would you want to advance this novel idea at this time? It would also bring in the Right to Farm laws and take away the right of a resident to challenge an operator when the adverse effects of their operation cause a nuisance. How is that protective of residents or achieve neighborhood compatibility? In addition, the California State Right to Farm ordinance exempts agriculture from being sued as a nuisance. Therefore, even if the County’s ordinance states that the Right to Farm does not apply to cannabis such a provision may at least raise a question whether such a provision would be inconsistent with State Law thus resulting in prohibiting residents from suing for nuisance. This proposal is troublesome and could lead to further erosion of protections for residents and other unintended consequences. **PLEASE VOTE NO**

**(5) SETBACKS:** Originally the proposed ordinance that went to the Planning Commission had required that there be a 600-foot setback between commercial cannabis cultivation and the Rural Residential Zoning Districts which is the district that our Bennett Ridge neighborhood is in. The Planning Commission is recommending that the setback to residential zoned properties be 1000 feet. In the materials for the October 28 meeting, although unclear, it appears that the recommendation has changed to a 1000-foot setback. This is certainly an improvement but based on your own EIR and based on studies and previous comments by rural residents that such odors can be detected as far as 2000 feet. (see the EIR and page 38 of the July 15, 2025 letter from the Shute, Mihaly, & Weinberger law Firm to Crystal Acker as well as other comments)) **Therefor this setback should be at a minimum 1000 feet as recommended by the Planning Commission and I ask that you consider setbacks up to 2000 feet from residential zoning districts.**

**(6) REDUCTION OF MINIMUM PARCEL SIZE FROM 10 ACRES TO 5 ACRES AND ELIMINATING THE ONE ACRE CULTIVATION CAP:** I am opposed to reducing the minimum parcel size for commercial cultivation from the current 10 acres to only 5 acres. This would have significant impacts on residents and neighborhoods. This is clearly going the wrong way and, along with the proposed reduction of setbacks in certain zoning districts, will only exacerbate the adverse impacts to neighbors. The Planning Commission has

recommended that the minimum parcel size remain 10 acres. In the materials for the October 28 meeting, although unclear, it looks that the recommendation has changed to retaining the 10 acres minimum parcel size. There are thousands of acres where cultivation can occur that would not be next to or near rural residents and neighborhoods. Why continue to insist on allowing for expansion of cultivation near

residents and rural neighborhoods coupled with inadequate setbacks? There has been shown that there is not a shortage of supply of cannabis. Those who wish to engage in this activity can purchase weed without any cultivation or expansion of cultivation in Sonoma County. Given the odor and other issues affecting residents, not only should the 10-acre minimum remain but consideration should be given to increasing the parcel size more than 10 acres in certain areas where there are neighborhoods. **PLEASE VOTE TO AT THE VERY LEAST RETAIN THE 10 ACRES MINIMUM PARCEL SIZE AND CONSIDER INCREASING THE MINIMUM PARCEL SIZE IN CERTAIN AREAS.**

**(7) CROP SWAPS:** I am opposed to the provisions that would allow so called crops swaps given that it appears that such swaps can be done through a ministerial process without providing any meaningful environmental review and ability for neighbors to address issues regarding such swaps. Where did this idea come from? Switching from traditional crops to cannabis can increase water demand and would be contrary to many strict rules in place to protect local water resources and existing residences. Crop swapping could disrupt existing agricultural ecosystems and degrade soil quality affecting long-term sustainability. In addition, such a provision if adopted could bring commercial cannabis cultivation with all the demonstrated detrimental impacts on residents specific to cannabis as opposed to existing traditional agriculture that do not have the unique problems of cannabis. Again, if this is allowed, you will be bringing more commercial cannabis cultivation and potential nuisances to residents who, when purchasing their properties, were aware they were moving close to traditional agriculture but certainly did not expect to have commercial cannabis cultivation with all its negative and unique impacts and nuisance potential to later be allowed close to their homes. **PLEASE VOTE NO**

**(8) ODOR, HEALTH, AND SETBACKS** As noted in the EIR and previous comments to the Board and Planning Commission over the years, the odor from commercial cannabis cultivation has a significant adverse effect on resident's ability to live and enjoy their homes. For years residents have told you how the smell of cannabis operations have negatively impacted their lives. In addition, there are some questions whether such odors impart the carcinogenic beta myrcene which could affect residents' health. The EIR summarily dismisses studies and opinions from qualified experts regarding the potential carcinogenic impacts on residents. The EIR states that cannabis cultivation operations that do not include odor control systems even if limited to within a greenhouse have potential to generate objectionable odors causing nuisance to nearby receptors. It also states that cannabis odors may be recognizable or detectable approximately 2 miles away from a cannabis operation. The EIR then goes on to state that odors are significant yet unavoidable. Really? How about prohibiting future outdoor cultivation? How about imposing meaningful setbacks? How about requiring other meaningful mitigation measures. Any attempt to get around this issue but adopting a Statement of Overriding Consideration should not be made given the facts and potential mitigation measures that could be adopted. **Even if you think there is some uncertainty about these issues, please err on the side of caution when determining appropriate setbacks to residences. Therefore, please require mitigation measures to cannabis cultivation sites and impose setbacks of at least 1000-feet (and preferably more) not only to residential zoning districts but to all residences (regardless of zoning districts).**

**CONCLUSION AND REQUEST.** Please consider all the adverse effects, health issues, social problems, odor, and economic failure for the County that cannabis is responsible for and consider that the neighboring counties of Marin and Napa have chosen to put the interests of its residents over the interests of a few in the industry. If you, after all of this, want to continue to allow commercial cannabis cultivation that you do so in a way that does not disproportionately and negatively impact residents, neighborhoods and the County in general. **Therefore, I merely ask that you analyze these issues objectively, bring balance to the issues and consider what's best for your resident constituents and the County in general.**

**This should not be an us vs. them thing, a generational thing, a political or ideological thing, but rather a commonsense thing. Even if there are controversy or different views on particulars, I urge that you show leadership, do the right thing and err on the side of caution and not continue to experiment with our beautiful County, our homes, our families and our lives.**

Respectively submitted.

Richard Rudnansky

Bennet Ridge Resident

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cannabis operation. The EIR then goes on to state that odors are significant yet unavoidable. Really? How about prohibiting future outdoor cultivation? How about imposing meaningful setbacks? How about requiring other meaningful mitigation measures. Any attempt to get around this issue but adopting a Statement of Overriding Consideration should not be made given the facts and potential mitigation measures that could be adopted. Even if you think there is some uncertainty about these issues, please err on the side of caution when determining appropriate setbacks to residences. Therefore, **please require mitigation measures to cannabis cultivation sites and impose setbacks of at least 1000-feet (and preferably more) not only to residential zoning districts but to all residences (regardless of zoning districts).**

**CONCLUSION AND REQUEST.** Please consider all the adverse effects, health issues, social problems, odor, and economic failure for the County that cannabis is responsible for and consider that the neighboring counties of Marin and Napa have chosen to put the interests of its residents over the interests of a few in the industry. If you, after all of this, want to continue to allow commercial cannabis cultivation that you do so in a way that does not disproportionately and negatively impact residents, neighborhoods and the County in general. Therefore, I merely ask that you analyze these issues objectively, bring balance to the issues and consider what's best for your resident constituents and the County in general.

This should not be an us vs. them thing, a generational thing, a political or ideological thing, but rather a commonsense thing. **Even if there are controversy or different views on particulars, I urge that you show leadership, do the right thing and err on the side of caution and not continue to experiment with our beautiful County, our homes, our families and our lives.**

Respectively submitted.

Richard Rudnansky

Bennet Ridge Resident

**From:** [Richard R. Rudnansky](#)  
**To:** [Rebecca Hermosillo](#); [Chris Coursey](#); [david.rabbit@sonomacounty.gov](mailto:david.rabbit@sonomacounty.gov); [James Gore](#); [Lynda Hopkins](#); [crystal.acker@sonomacounty.gov](mailto:crystal.acker@sonomacounty.gov); [Cannabis](#)  
**Subject:** Petition of the Bennett Ridge Community Association Board of Directors re Cannabis Update / Board of Supervisor Meeting of October 28, 2025  
**Date:** Thursday, October 23, 2025 1:08:26 PM  
**Attachments:** [BRCA CANNABIS PETITION OCT 25.pdf](#)

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Please find attached a Petition from the Bennett Ridge Community Association Board of Directors for the Board of Supervisors Meeting of October 28, 2025, regarding the County's Cannabis Program Update.

Please make this petition part of the public record for the meeting.

if you have any questions please contact me.

Thank you.

Richard Rudnansky

Chair of the Bennett Ridge Ad Hoc Cannabis Committee

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## **PETITION RE CANNABIS PROGRAM UPDATE**

**TO:** Supervisor Hermosillo

Supervisor Rabbitt

Supervisor Coursey

Supervisor Gore

Supervisor Hopkins

Staff Member Crystal Acker

**FROM:** Bennett Ridge Community Association Board Members

**RE:** Cannabis Program Update / EIR / Ordinance, General Plan Amendment

**DATE:** October 20, 2025

The Bennett Ridge Community Association (BRCA) Board of Directors submits the following petition setting forth its opposition to various portions of the proposed EIR, Draft Ordinance and General Plan Amendments related to the County's Cannabis Update

The BRCA is an organization that works to maintain the quality of life on Bennett Ridge. Bennett Ridge is a residential neighborhood consisting of Old Bennett Ridge Road, Bardy Road, Rollo Road, and Bennett Ridge Road. Bennett Ridge is a true neighborhood in every sense of the word. We have residents of all ages, including young children.

**SUPPORT FOR PROHIBITION ON COMMERCIAL CANNABIS CULTIVATION IN THE RURAL RESIDENTIAL ZONING DISTRICT:** While we are pleased that the proposed update continues the prohibition of commercial cannabis cultivation in the Rural Residential Zoning District (RR), the zoning designation for our neighborhood, we have grave concerns about other aspects of the proposed update that would impact the County in general and our Bennett Ridge neighborhood and Bennett Valley in particular.

**ENVIRONMENTAL IMPACT REPORT:** First, we have concerns about the validity of the EIR. As indicated in the letter from the Shute Mihaly Wienberger Law Firm, there seems to be serious deficiencies and inaccuracies in the EIR which should be of concern to the County as well. In any event, we ask that you select Alternative #2 in the EIR which would limit commercial cultivation to indoors which would eliminate most of the problems experienced by residents. However, if you reject this request, here are our comments and requests on just some of the more problematic aspects of the proposed ordinance and general plan amendment.



**SETBACKS:** It is being proposed that there be a 600-foot setback between commercial cannabis cultivation and the Rural Residential Zoning Districts which is the district that our neighborhood is in. Based on your own EIR and based on studies and previous comments by rural residents that such odors can be detected as far as 2000 feet. The 600-foot setback is insufficient and should be at a minimum 1000 feet as recommended by the Planning Commission and we ask that you consider 2000 feet.

**CANNABIS SPECIAL EVENTS:** We strongly oppose the provisions that would allow so-called "Cannabis Special Events". The proposed ordinance would allow up to 104 such events per year including on site sales and consumption. Studies have shown that driving while under the influence of today's high potency cannabis impairs one's ability to operate a motor vehicle. Given some of the County's narrow roads and the disruption such events would have on residences and neighborhoods, this would not help meet the County's stated objectives to ensure cannabis uses are compatibility with areas of residential uses. Please vote NO on this provision.

**ODOR AND HEALTH ISSUES:** As noted in the EIR and previous comments to the Board and Planning Commission over the years, the odor from commercial cannabis cultivation has a significant adverse effect on resident's ability to live and enjoy their homes. For years residents have told you how the smell of cannabis operations has negatively impacted their lives. In addition, there are some questions whether such odors impart the carcinogenic beta which could affect resident's health. Even if there is some uncertainty on this issue, we ask that you err on the side of caution when determining appropriate setbacks to residences. Therefore, please require mitigation measures to cannabis cultivation sites and impose setbacks of at least 1000-feet (and preferably more) not only to residential zoning districts but to all residences (regardless of zoning districts).

**CROP SWAP:** We are opposed to the provisions that would allow so called crops swaps given that it appears that such swaps can be done through a ministerial process without providing any meaningful ability for neighbors to address issues regarding such swaps. Switching from traditional crops to cannabis can increase water demand and would be contrary to many strict rules in place to protect local water resources and existing residences. Crop swapping could disrupt existing agricultural ecosystems and degrade soil quality affecting long-term sustainability. In addition, such a provision if adopted could bring commercial cannabis cultivation with all the demonstrated detrimental impacts on residents specific to cannabis, as opposed to existing traditional agriculture that does not have the unique problems of cannabis. Please vote NO.

**DESIGNATING CANNABIS AS "CONTROLLED AGRICULTURE".** It is being proposed that there be an amendment to the General Plan designating cannabis as "controlled agriculture". We

strongly oppose such a designation. Although there are many reasons why cannabis is not agriculture and because not one jurisdiction in California so designates it as such, this appears to be merely an attempt to provide cannabis with some added protections and expansion avenues which would lead to a number of detrimental impacts to the County and its residents. One such detriment to residents is that, by employing this fiction, it could bring in the Right to Farm laws that may then prohibit residents from bringing suits against operators whose operations create nuisances. Please vote NO.

**REDUCTION OF MINIMUM PARCEL SIZE:** We are opposed to reducing the minimum parcel size for commercial cultivation from the current 10 acres to only 5 acres. This would have significant impacts on residents and neighborhoods. This is clearly going the wrong way and, along with the proposed reduction of setbacks in certain zoning districts, will only exacerbate the adverse impacts to neighbors. Given the odor and other issues affecting residents, not only should the 10-acre minimum remain, but consideration should be given to increasing the parcel size to more than 10 acres in certain areas where there are neighborhoods. Please vote NO on this proposed reduction in parcel size

Please make this petition part of the public record for the Board of Supervisor's Meeting of October 28, 2025

Respectfully Submitted

Bennett Ridge Community Association Board of Directors

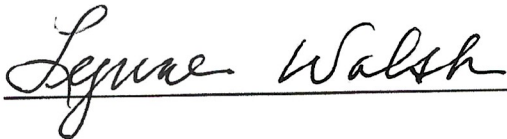
Becky Bass, President



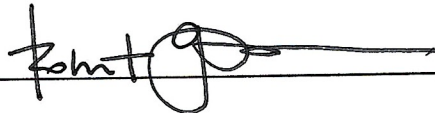
Lise Valbert, Secretary



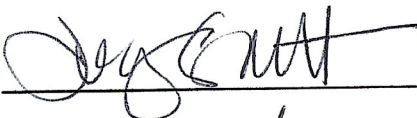
Lynne Walsh, Treasurer



Robert Gleeson, Director at Large



Wendy Schmitt, Director at Large



Bill Sirvatka, Director at Large



**From:** [Hadley Dynak](#)  
**To:** [BOS](#)  
**Subject:** Cannabis Setback Recommendation - Public Comment  
**Date:** Thursday, October 23, 2025 5:05:40 PM

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Dear Sonoma County Board of Supervisors,

I am a District 5 resident and business owner.

I'm writing to express gratitude for the Planning Commissioners and County staff who have taken the huge step of recommending a 1,000-foot setback between RR homes and commercial cannabis operations.

This recommendation is the result of hard work by the citizens of Bloomfield and others who have spent five years advocating on behalf of the health and quality of life of rural residents and their families.

As you work through the policy process -- I strongly encourage you to consider several very important points.

1. An application to operate should not be a vested right.
2. The new setbacks must apply to all applications irrespective of their stage of review.
3. Permits should be time-limited to ensure accountability.

Thank you for your support of this important change.

Best,  
Hadley Dynak  
Occidental, CA

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Hadley Dynak  
510.333.6659 (cell)

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