

From: [Deb Pucillo](#)
To: [Marina Herrera](#)
Subject: Lisa Lai
Date: Friday, March 12, 2021 2:00:01 PM

EXTERNAL

I'm writing this email to show just how important I think it is to support and encourage our local cannabis farmers. Lisa Lai has been an integral part of this community for years and at the forefront of local growing and farming. She epitomizes what supporting your LOCAL farmers can be. Thank you for your consideration.

Sent from my iPhone

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From: [sica](#)
To: [Marina Herrera](#)
Subject: UPC17-0041 Letter of support
Date: Sunday, March 14, 2021 9:21:21 AM

EXTERNAL

Hello,

I am submitting this letter in support of UPC17-0041.

This project would be beneficial to our county. Please grant this application a permit.

I have known Lisa Lai for several years, both professionally and personally. I admire her attention to detail and her determination in helping her fellow community members in their times of need, even when she has been personally affected by misfortune along with those around her, as was the case during and after the 2020 wild fires.

I work with Lisa as a Grange member and can attest to her professionalism and high moral character.

She is a community minded business owner and that is what we need more of in our county !

This business already has longstanding relationships with dispensaries in the county, and can help circulate tax dollars within the county by "Keeping it local". This business can and does represent a great example of what local small scale cannabis cultivation done in a responsible way, can look like.

Please grant this permit and allow this business to keep doing the work that they excel at.

Granting this permit is the right decision.

Thank You,

Sica Roman -CEO- Spring Creek Farm

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From: [Diane M. Bettencourt](#)
To: [Marina Herrera](#)
Subject: Lisa Lai Project
Date: Saturday, March 13, 2021 12:41:02 PM

EXTERNAL

To whom it may concern:

I have know Lisa Lai for several years and have found her to be a responsible and caring person. Regarding her Cannabis Farm Project, she has always been environmentally conscious, and abides by the rules set forth. I fully support her in this endeavor. Sincerely, Diane Bettencourt

Sent from my iPhone

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From: [David Seyms](#)
To: [Marina Herrera](#)
Subject: UPC17-0041
Date: Friday, March 12, 2021 5:21:35 PM

EXTERNAL

Dear Marina Herrera,

I am writing in support of the Lai family's cannabis operation. I know the small family business well and support their endeavors to create a thriving and responsible cannabis farm in Sonoma County. The Lai's are a gift to our community, they are wonderful parents to their two young children and we often see them taking their kids to swim lessons or running into them on hiking trails in Jack London State Park.

Small, family run businesses are the backbone to any economy, and this is a chance to give a family a chance to make an honest, hard work oriented living in our county. When I think of what kind of future I want for my children, I know that small family farms are what I want in our local economy. The Lai's are honest, hard working people trying to follow their passion, working the land, providing local jobs and giving back to their community.

I support them and their project wholeheartedly.

David Seyms
Lifelong Sonoma Resident

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From: [Mayme Kwitkor](#)
To: [Marina Herjavec](#)
Subject: UPC17-0041
Date: Friday, March 12, 2021 3:54:08 PM

EXTERNAL

Greetings Marina,

As a Sonoma County native, I wanted to take the time to write to you in support of Lisa Lai's project: #UPC17-0041.

Over the years I have known and worked with Lisa, I have been impressed by her professionalism and extensive knowledge of sustainable and environmentally conscious cannabis cultivation. She has a background as an environmental scientist, and this experience will absolutely be evident in any project she takes on.

When I had the opportunity to visit her property before the fires, I could see she had done an amazing amount of work to be a true steward of the land. Although she operates as a small (even tiny) legacy farm and has no impact on the nearby park, she had made enhancements to the property that can only positively impact the wildlife of the area, like adding birdhouses and bat boxes, and planting native flowers. In short, she is exactly the type of person people in Sonoma County would want to see operating here.

Please strongly consider approving her project, so she can move forward and continue to contribute positively to our community!

Thank you for your time!

--



Mayme Kwitkor
265 E Todd Rd,
Santa Rosa, CA 95407
t (707) 225-0371
e mayme@naturalcannabis.com
w naturalcannabis.com



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From: [matthew.pope](#)
To: [Marina Herrera](#)
Subject: Subject UPC17-0041
Date: Friday, March 12, 2021 4:46:57 PM

EXTERNAL

Dear Mrs.Herrera,

I am writing to you to express my support for project #UPC17-0041: Cannabis Farm.

I have known Lisa Lai on both a professional and personal for five years now. As the educator of her daughter and our joint participation on school committees, I have seen first hand her willingness to support her school community via her active participation in fundraising for our school as well as lending her expertise in biology as a volunteer in our school garden and on environmental education field trips.

As a gardening and cannabis enthusiast, I have also had the opportunity to see their cannabis farm in operation prior to last year's wildfires. These opportunities demonstrated to me the commitment that Lisa and her family give to providing a quality product that is environmentally sustainable. In addition to the meticulous care put into the cannabis plants, this same high-level of quality was also seen in her beehives used for beekeeping. Clearly, Mrs. Lai applies a lot of her biological background into the nurturing of the lives of the plants and insects that are raised on her farm.

Also being a frequent visitor to Hood Mountain Regional Park (disc golf, hiking) I have never once witnessed any sort of environmental impact with this farm being adjacent to this open space. I think approval of this project can serve as a finer example of how we as a county can creatively and responsibly have open space recreation areas, critical habitats and sustainable agriculture coexist without causing harm to each other.

Mrs. Lai, in my experience has demonstrated her environmental responsibility and expertise in creating a viable model that can be used to further develop agriculture in this county.

I urge you to give your full support to Mrs. Lai and to this project.

Sincerely,

Matthew Pope

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From: [Robyn](#)
To: [Marina Herrera](#)
Subject: High Regards for Lisa Lai
Date: Tuesday, March 16, 2021 10:15:16 AM

EXTERNAL

Good morning.

This is a message in high support for Lisa Lai and her farm. I have known her and her amazing family for years. They are an endlessly kind and generous family and loved in the community. I support her and her work mostly because I know Lisa and have the utmost respect for her. Lisa is responsible and a legacy grower. This is a small, local farm that is not trying to be more. She's honest and trustworthy. I can not express my support for her and her farm enough. She and her farm are an asset to our community.

Thank you,
Robyn Grace Jennings
Sonoma

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From: ray@tbearch.com
To: [Marina Herrera](#)
Subject: Subject: UPC17-0041
Date: Saturday, March 13, 2021 2:05:20 PM

EXTERNAL

Dear Sonoma County Board of Supervisors,

I am writing to express my support for staff's recommendation to adopt a mitigated negative Declaration for my client's project at 2000 Los Alamos Road, APN 030-050-009.

Projects like this support the small employers of Sonoma County and benefit the County Tax base as a whole. During this Pandemic, having clients in the cannabis industry has provided a baseline stability for my firm, my employees, my family and by extension the community at large.

Please act swiftly to move this and other similar projects through the hurdles of this process.

Kind Regards,
Raymond Willett

Ray Willett AIA, LEED AP
ARCHITECT/OWNER
C35917
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579 5th Street West, Sonoma CA 95476
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From: [Taniya Fuller Green](#)
To: [Marina Herrera](#)
Subject: UPC17-0041
Date: Monday, March 15, 2021 10:16:43 PM

EXTERNAL

I am writing in support of Lisa and her farm. She is a small, local, legacy farmer who is an active member of the cannabis industry in Sonoma County.

Taniya Fuller
Rohnert Park

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April 09, 2021

Marina Herrera
Permit Sonoma
2550 Ventura Avenue, Santa Rosa, CA 95403
(707) 565-2397

Re: Review of Mitigated Negative Declaration (SCH No. 2021030269) – UPC17-0041; Indoor & Mixed Light Cannabis Cultivation – Use Permit (UP) 17-0041.

Dear Ms. Herrera:

Thank you for providing the California Department of Food and Agriculture (CDFA) CalCannabis Cultivation Licensing Division (CalCannabis) the opportunity to comment on the Mitigated Negative Declaration (MND; SCH No. 2021030269) prepared by Sonoma County for the proposed UPC17-0041; Indoor & Mixed Light Cannabis Cultivation (Proposed Project).

CDFA has jurisdiction over the issuance of licenses to cultivate, propagate and process commercial cannabis in California. CDFA issues licenses to outdoor, indoor, and mixed-light cannabis cultivators, cannabis nurseries and cannabis processor facilities, where the local jurisdiction authorizes these activities. (Bus. & Prof. Code § 26012(a)(2).) All commercial cannabis cultivation within California requires a cultivation license from CDFA. Therefore, with respect to the Proposed Project, CDFA is a responsible agency under the California Environmental Quality Act (CEQA). For a complete list of all license requirements, including CalCannabis Licensing Program regulations, please visit: https://static.cdfa.ca.gov/MCCP/document/CDFA%20Final%20Regulation%20Text_01162019_Clean.pdf.

CDFA expects to be a Responsible Agency for this project because the project will need to obtain an annual cultivation license from CDFA. In order to ensure that the IS/MND is sufficient for CDFA's requirements, CDFA requests that a copy of the IS/MND, revised in response to the comments provided in this letter, and a signed Notice of Determination be provided to the applicant, so the applicant can include them with the application package it submits to CDFA. This should apply not only to this



Proposed Project, but to all future CEQA documents related to cannabis cultivation applications in Sonoma County.

CDFRA offers the following comments concerning the IS/MND.

General Comments (GC)

GC 1: Proposed Project Description

In general, more detailed information related to Proposed Project operations and routine maintenance would be helpful to CDFRA. This includes:

- the types and projected duration equipment anticipated for operations and maintenance activities;
- the number of workers employed at the cultivation site, and estimated number of daily vehicle trips projected to occur during operation; and
- the source (equipment) and amounts of energy expected to be used in operating the cultivation facility, including any energy management and efficiency features incorporated into the Proposed Project.

It appears that some of these details may be contained in the Stormwater Management Plan, Odor Management Plan, and other reports and studies prepared for the Proposed Project (as indicated in the list of sources at the end of the IS/MND). CDFRA requests that the County remind applicants to include a copy of these documents with their application to CDFRA.

GC 2: Acknowledgement of CDFRA Regulations

The IS/MND states that CDFRA is responsible for “monitoring commercial cannabis cultivation.” CDFRA is responsible for the licensing of cannabis cultivation and is responsible for the regulation of cannabis cultivation and enforcement, as defined in the Medicinal and Adult Use Cannabis Regulation and Safety Act (MAUCRSA) and CDFRA regulations related to cannabis cultivation (Bus. & Prof. Code, § 26103(a)). The IS/MND’s analysis would also benefit from discussion of the protections for environmental resources provided by CDFRA’s regulations (Cal. Code Regs. tit.3, § 8000 et seq.). In particular, the impact analysis would be further supported by a discussion of the effects of state regulations on reducing the severity of impacts on the following resource topics:

- Aesthetics (See 3 California Code of Regulations § 8304(c); § 8304(g).)
- Air Quality and Greenhouse Gas Emissions (See § 8102(s); § 8304(e); § 8305; § 8306.)
- Biological Resources (See § 8102(w); § 8102(dd); § 8216; § 8304(a-c); § 8304(g).)

- Hazards and Hazardous Materials (See § 8102(q); § 8106(a)(3); § 8304(f); § 8307.)
- Hydrology and Water Quality (See § 8102(p); § 8102(v); § 8102(w); § 8102(dd); § 8107(b); § 8216; § 8304(a and b); § 8307.)
- Noise (See § 8304(e); § 8306.)
- Utilities and Service Systems (See § 8102(s); § 8108; § 8308.)
- Energy (See § 8102(s); § 8305; § 8306.)
- Cumulative Impacts (related to the above topics).

GC 3: CalCannabis PEIR potential impacts

The CalCannabis PEIR determined that some environmental topics generally fell outside of CalCannabis' regulatory authority because these topics are regulated by local land use. Additionally, there are other topics for which detailed analysis in the CalCannabis PEIR was not possible because of the statewide nature of the CalCannabis licensure program. Many of these topics involve the evaluation of site-specific conditions, the details of which were infeasible to identify and evaluate in a statewide PEIR, and the characteristics of which were unknown at the time the PEIR was published (e.g., the locations of new cultivation sites that would be planned and licensed were unknown at the time the PEIR was published).

For those topics, listed below, the CalCannabis PEIR determined that potential impacts would most appropriately be evaluated in local regulatory program-level documents or site-specific documents.

CalCannabis requests that CEQA documents prepared by or on behalf of cannabis cultivation applicants evaluate the impacts of commercial cannabis cultivation projects for these resource topics, at an appropriate regionally-focused and site-specific level, and include mitigation measures that will ensure projects will not result in significant adverse impacts on the environment.

Conclusion

CDFA appreciates the opportunity to provide comments on the IS/MND for the Proposed Project. If you have any questions about our comments or wish to discuss them, please contact Kevin Ponce, Senior Environmental Scientist, at (916) 247-1659 or via e-mail at Kevin.Ponce@cdfa.ca.gov.

Sincerely,

Lindsay Rains, Licensing Program Manager

From: [Alexa Wall](#)
To: [Marina Herrera](#)
Subject: Project Support for UPC17-0041
Date: Thursday, April 1, 2021 4:06:58 PM

EXTERNAL

Hello!

My name is Alexa Wall and I am a local Sonoma County resident. I am writing in **full support of Lisa Lai's project** UPC17-0041. Not only is Lisa a wonderful person but she is also a great cultivator and respected member of the cannabis industry. Her project meets the requirements of the ordinance and would provide much needed jobs and tax dollars for the County. Sonoma has had cannabis growing here for decades and Lisa is one of the many legacy farmers that put their faith in Sonoma County's Cannabis Program by coming out of the shadows and followed all the rules so in return I fully support this project being awarded a CUP.

Kindly,
Alexa

--

Alexa Rae Wall

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Via email to Marina.Herrera@sonoma-county.org

Marina Herrera
Sonoma County

April 9, 2021

Re: **Comments on UPC 17-0041**

Dear Ms. Herrera,

I appreciate the opportunity to provide my perspective on this proposed conditional use permit. This is the wrong location for this project and it should be denied. The grower should relocate to a more suitable location, such as an industrial-zoned area.

1. Water Issues

The project is located in a class 4 water zone—the most challenging zone in the county—and uses groundwater. By definition wells in this zone always have very low water yields. Moreover, I understand the well has not been tested under the current drought conditions and there are questions as to whether this area can recharge adequately.

NOAA/National Marine Fisheries (NMFS), a federal trustee agency, has raised concerns in the attached letter dated February 26, 2021 to Sonoma County's Director of PRMD. NMFS is concerned that because "the vast majority of cannabis cultivation applications throughout the County are opting for groundwater wells as their water source, . . . wells are being drilled and pumped without appropriate analysis regarding their potential impact to surface water, especially near-stream wells that may also impact groundwater/surface water dynamics and result in streamflow depletion." P. 1. Because of this concern, NMFS recommends that the county "require either a net zero water plan, or a hydrogeologic analysis confirming streamflow depletion impacts are unlikely, before any cannabis operation utilizing a near-stream well is approved." P. 2. There is no net zero water plan, nor has the analysis confirming streamflow depletion impacts been completed. For this reason alone, the permit should be denied.

The California Department of Fish and Wildlife (CDFW), a Trustee Agency, raises concerns about water in the attached letter dated March 17, 2021 to Sonoma County. At p. 6 it states

CDFW recommends the County assess the aquatic carrying capacity of watersheds to support cannabis cultivation and propose a limit on density or number of cultivation sites. The focus of the assessment should be to determine the maximum water use availability from watersheds that maintains adequate water supply for fish and wildlife species, considering the cumulative impact

of existing and future legal and illegal diversions. Prior to issuing permits for new cultivation sites, the County should prepare the assessment at a watershed scale describing a) existing water use and availability, b) potential for sediment and other pollutant discharge, and c) percentage of habitat fragmentation within a given watershed.

The analyses recommended by the state trustee agency have not been completed. For this reason alone, the permit should be denied.

2. Fire Safe Road Issues

The project is located at mile 5.6 on the 6-mile dead end Los Alamos Road in a high and/or very high fire zone. Then a private 0.4-mile road that is 10-12 feet wide provides access to the project site. Because this is a state responsibility area (SRA), Cal Fire's SRA regulations apply, Cal. Code. Regs., tit. 14, §§ 1270-1276. Because the dead-end road exceeds one mile in length, this project violates the limit on dead-end roads, § 1273.08(a). The access road also violates the requirement that access roads be at least 20 feet wide. § 1273.01.

In 2019, the Office of the Attorney General confirmed that dead-end road limitations apply to projects such as this when it commented the proposed Paraiso Springs Resort located in a fire-prone area in Monterey County. The Attorney General's Office wrote

The Project does not comply with the state's dead-end road limitations and road width limitations applicable to the State Responsibility Area (SRA). . . . the County expresses its view that the dead-end road limitation does not apply to the Project, because the road, having been built in the 19th century and maintained by the County, is not subject to the SRA regulations. Neither the regulations nor the statute setting forth the SRA requirements, however, include an exemption for historic roads or roads maintained by the county. In general, the SRA requirements apply to any application for new construction with only limited exceptions for certain parcel or tentative maps approved before 1991 and roads used solely for agriculture, mining or timber related purposes.¹

When Monterey County contended that its local code exempts existing roads from the regulation for width and a ban on long, dead-end roads, the Attorney General's Office responded that whether a road "is a preexisting road is inconsequential," and "a County Code exemption for existing roads is inapposite."² Fundamentally, "exempting a Project from the SRA regulations simply because [it] is a pre-existing road would undermine the intent of the SRA regulations."³

¹ Letter from Deputy Attorney General Heather C. Leslie to Planning Commission of Monterey County, pp. 1-2 (July 9, 2019).

² Letter from Deputy Attorney General Nicole Rinke to Planning Commission of Monterey County, p. 2 (October 25, 2019).

³ *Id.*

The application of the SRA Fire Safe Regulations to existing roads was reconfirmed by the Senior Board Counsel, Board of Forestry and Fire Protection, in October 2020 (attached). With regard to the failed attempt of Sonoma County to certify its ordinance as equal of exceeding the regulations, he wrote

Throughout the certification process, Sonoma County has repeatedly maintained that Public Resources Code section 4290 and the Fire Safe Regulations do not apply to existing roads. Sonoma County's position is incompatible with the plain language of PRC § 4290.5 the Fire Safe Regulations, and opinions and letters issued by the Attorney General of California. More importantly, the Fire Safe Regulations themselves—which constitute the basis for the certification determination—clearly provide no exemption for existing roads, and it is these regulations that the Sonoma County ordinance must equal or exceed. [citations omitted].⁴

Sonoma County claims that installing a turnaround at the end, one turnout in the middle, and widening the entrance from Los Alamos Road has the same practical effect as a 20-foot-wide road for achieving concurrent evacuation and fire apparatus ingress. This is clearly erroneous and would be overturned by any court of law.

3. Tree Removal.

The grower should not be allowed to remove 38 trees (two-thirds of the trees on a 15-acre parcel) to build new structures. This area burned a few months ago in the Glass Fire, and the remaining oak trees should be allowed to recover to provide needed habitat. The report fails to mention the size of the trees. CDFW is very concerned about tree removal, especially large diameter trees 15-inches and greater. Its letter, pp. 13-14 states

The Project avoids large diameter tree removal (e.g., 15-inches and greater), prohibits loss of oak woodlands and conversion of timberland, and avoids special-status botanical resources. On-site tree replacement should be considered as a potential impact minimization measure, but not sufficient to completely offset temporal impacts from loss of large mature trees. CDFW recommends Project mitigation from loss of large trees on-site, and potentially should include off-site preservation of trees in perpetuity.

In addition, the trees are needed to prevent soil erosion in the headwaters of Santa Rosa Creek, a spawning ground to both steelhead and coho salmon that are under protection of the federal Endangered Species Act. As stated in the letter from NMFS, the federal trustee agency is concerned about cannabis cultivation impacting ESA-listed salmonids and their habitat.

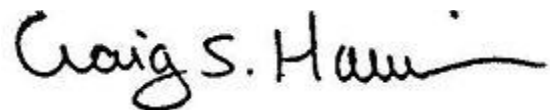
⁴ Letter from Jeff Slaton, Senior Board Counsel, Board of Forestry and Fire Protection to Linda Schiltgen, Deputy County Counsel, County of Sonoma, p. 6 (October 23, 2020).

4. Proximity to Hood Mountain Park

The grower claims the mixed light greenhouse is shielded by thick vegetation from the park. After the Glass Fire, this is certainly not true. Los Alamos Road is frequented by bicyclists- both competitive for training as well as recreational as well as park visitors. This violates § 26-88-254(f)(3), which provides “[o]utdoor cultivation areas shall not be visible from a public right of way.”

This permit should be denied.

Sincerely,

A handwritten signature in black ink that reads "Craig S. Harrison". The signature is written in a cursive style with a long horizontal flourish at the end.

Craig S. Harrison
Santa Rosa

**Comments on Mitigated Negative Declaration for the proposed indoor cannabis cultivation
at 2000 Los Alamos Road, Santa Rosa, CA 95409
UPC17-0041; Indoor & Mixed-light Cannabis Cultivation. APN 030-050-009**

Deborah A. Eppstein, PhD April 8, 2020

Aesthetics (p10).

The MND states “Construction of the two new cultivation structures would require the removal of trees east of the current development. After tree removal, the site would still be protected by intervening vegetation and topography to the east that would protect any views from travelers of Los Alamos Road,”

How many trees will be removed, and what is the status of the trees after the Sept 2020 Glass Fire that heavily burned this area? In a prior project proposal, it stated that over 2/3 (~45) trees would be removed to build the greenhouse. Many oak trees damaged in the fire will recover, but it can take up to 2-3 years to determine this. The whole area has been severely stressed from the fire, and it is critical to restoring the area and the habitat to let oak trees recover. Also, how much will the greenhouse be screened after the fire? Hood Mt Regional Park is adjacent to the parcel, and the road is frequented by bicyclists. It may take several years before trees recover sufficiently to screen the greenhouse. The greenhouse should not be built until an assessment can be made as to which trees may recover, and confirming the sufficient availability of water to serve both the water intensive mixed light and indoor cultivation sites (discussed under Hydrology). A greenhouse is very visible and glaring, disturbing the prior visual character of the area. The prior mature vegetation discussed in the MND has been severely damaged by the Glass fire, and the extent of its recovery needs to be assessed no sooner than October 2022 before any decision should be made on removing trees or building new structures, including the greenhouse. The park variance request needs to be re-evaluated in light of the damage to mature vegetation from the 2020 Glass Fire.

Concerning light pollution, the MND mentions that the lights in the indoor facilities will be fully contained such that little or no light escapes, but concerning the greenhouse, it only states that the lights in the greenhouse will be downward facing, but does not state that light would not escape. Unless it is fully shielded at night, light from a greenhouse will escape and be visible in the night sky. This could be a big problem for animals such as migratory birds, who fly at night, bats (including the pallid bat, a species of special concern) and all nocturnal animals. In order to meet the requirements noted in County Code 26-88-254(f)(19), the greenhouse also needs to be fully shielded.

All lighting shall be fully shielded, downward casting and not spill over onto structures, other properties or the night sky. All indoor and mixed light operations shall be fully contained so that little to no light escapes. Light shall not escape at a level that is visible from neighboring properties between sunset and sunrise.”

Biological Resources- p 17—28.

In light of the vegetation destruction from the Glass Fire and the location of the subject property near the headwaters of Santa Rosa Creek (1900 ft, downhill to the east as stated on page 38), in

**Comments on Mitigated Negative Declaration for the proposed indoor cannabis cultivation
at 2000 Los Alamos Road, Santa Rosa, CA 95409
UPC17-0041; Indoor & Mixed-light Cannabis Cultivation. APN 030-050-009**

Deborah A. Eppstein, PhD April 8, 2020

conjunction with proposed grading to build two new structures, run-off affecting the headwaters of Santa Rosa Creek is of concern. This is another reason to avoid proceeding with the 2 new structures until at least 2 years of recover post fire have transpired.

Energy- p30-31.

The concern with the increased electricity usage from the 2 indoor and 1 greenhouse grow facilities relates to fire risk. This project is in a very high fire risk zone, according to the CalFire maps. It burned in the 2020 Glass Fire, and was very close to the burned area in the 2017 Nuns fire. I did not see this addressed, but to reduce the risk of fire, all electrical infrastructure should be underground from the PG&E poles.

Hazards. p35-37. The MND states:

“The project would not impair implementation of, or physically interfere with, the County’s adopted emergency operations plan. There is no separate emergency evacuation plan for the County.”

Stating that there is no emergency evacuation plan is not a sufficient answer! This area has been under mandatory evacuation in 2017, 2019 and 2020. Evacuation is of major concern, and the MND should address it. Users of Hood Mt Regional Park, employees of the cannabis operation, and ~240 households on Los Alamos Road and feeder roads will all use the same, sole evacuation route. Wildfires move rapidly. It is also relevant to note that Los Alamos Road is used frequently by bicyclists, both recreational as well as competitive training. Additional traffic especially during the multiple periods of harvest will increase risk of accidents with bicyclists.

Hydrology- p38-53.

The MND states;

“Though Santa Rosa Creek is located downhill and in the vicinity of the project site, the abundant vegetative cover, including cismontane woodland and foothill grasses, and physical space located in between the project site and the creek would conceivably prevent project discharge from entering Santa Rosa Creek.”

As the Glass Fire destroyed all of the brush vegetation and much of the tree vegetation, the above statement is no longer applicable. Without this vegetative cover, there is concern on project discharge entering the sensitive headwaters of Santa Rosa Creek. This creek is home to both Steelhead and Coho salmon. This needs to be re-evaluated with the new landscape post fire. Until there is sufficient evidence demonstrating the runoff potential has been adequately addressed, no new structures should be constructed. The level of recovery of vegetation must be evaluated over the next two-three years.

Groundwater supplies and recharge (p39-48).

The MND refers to the hydrology report prepared by O’Connor Environmental, Inc, dated. May

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Deborah A. Eppstein, PhD April 8, 2020

1, 2018). That report evaluated groundwater recharge using data from 2010, a year when Santa Rosa rainfall was 30% higher at 39 inches than the historical average of 30 inches/year. It concluded that the level of water taken by the applicant's two wells would use the equivalent of 7.0% of the mean annual groundwater recharge. This analysis is flawed as it must address ground water availability and recharge during prolonged years of drought. We are currently in a two-year significant drought, and with climate change, droughts will become more common. We ended a three-year drought in 2017, with our current drought starting in 2019. Thus in a 6 year period, we currently have 4 years of drought. The project should be limited to at most rebuilding the prior barn (destroyed in the Glass Fire) used for indoor cultivation, with no expansion unless a re-evaluation the hydrological situation, during multiple years of drought, supports the proposed combined water usage.

The analysis of runoff from grading, road expansion, and construction needs to be redone in light of the changes in vegetation after the Glass Fire.

Noise- p45.

The MND discussed noise from circulation fans and carbon filters required for all three indoor/greenhouse cultivation facilities.

“This equipment would be small scale in nature (due to the limited building square footages associated with the project) and would primarily operate during the daytime (9:00 AM-2:00 PM)”

The above statement is not supported by the prior discussion of required operation of carbon filters to remove odor continuously. This analysis needs to be properly conducted, and impact of noise on animal life including humans assessed.

Transportation. P51

It is relevant to note that Los Alamos Road is used frequently by bicyclists, both recreationally as well as for competitive training. Additional traffic especially during the multiple periods of harvest will increase risk of accidents with bicyclists.

Utilities and Service Systems. P53.

Although the hydrology report concluded that sufficient groundwater was available, as noted above this analysis was done in a year of above normal rainfall, not in drought years. This project is located in water scarce zone 4. The two wells are very low yield, at 0.69 gpm, and 1.69 gpm. Half of this water must be reserved for fire fighting; thus only 2500 gal is available for irrigation, necessitating filling the tank frequently. However, it does not appear that the well yield or groundwater recharge rate have been tested during the drought. All the hydrological information needs to be re-assessed under several years of drought conditions. As building two new structures for indoor cannabis cultivation with multiple harvest/year will result in significant

**Comments on Mitigated Negative Declaration for the proposed indoor cannabis cultivation
at 2000 Los Alamos Road, Santa Rosa, CA 95409
UPC17-0041; Indoor & Mixed-light Cannabis Cultivation. APN 030-050-009**

Deborah A. Eppstein, PhD April 8, 2020

more water usage than in the past, as well as increase hardscape reducing ground water recharge, these new structures should not be built until adequate water has been determined to be available during years of prolonged drought. Sonoma County has a water crisis and we need to carefully evaluate any new water usage in light of demands for existing projects and reduced water availability.

Wildfire. p54-57.

The project is located in a very high fire hazard severity zone in the SRA. It was very close to being burned in the 2017 Nuns Fire, and was severely burned in the 2020 Glass Fire. Fire will come to this area again.

The MND states (p56):

“Additionally, the project site is located within the fire scar of the 2020 Glass Fire. The project parcel has a western to eastern downhill slope with elevations ranging from 1,490 feet MSL along its northwestern boundary to 1,280 feet MSL along the eastern boundary. In addition, project components would be located approximately 1,900 feet from the base of a small gulch in which the Santa Rosa Creek runs. Thus, the project area has geographic features, including steep inclines and a gulch, that could potentially contribute to or augment fire intensity.”

The Glass Fire in 2020 burned particularly hot in and up gulches along Los Alamos Road. Adding new development to high fire risk areas further increases the probability of wildfire, as humans are the major cause of wildfire, causing 84% of all wildfires in the US. Increased vehicle traffic, smoking, increased electrical usage, new power infrastructure, all contribute to increased fire risk. Adding combustible structures further increases intensity of burning and wildfire destruction.

The state Title 14 SRA Fire Safe Regulations require that all roads accessing a parcel for new development meet minimum specifications. These include being 20 ft wide, and that dead-end roads are no longer than one mile. The subject property does not meet those requirements. Although the regulations allow for exceptions to the standards if they provide ‘the same practical effect’ as the regulations, this has not been met. The exception statement filed by applicant reiterates, as do the regulations, that this will provide safe access for emergency wildfire equipment and civilian evacuation concurrently, and shall provide unobstructed traffic circulation during a wildfire emergency consistent with 14 CCR § 1273.00-1273.09. The access roads to the property clearly do not meet those requirements including both for road width and dead-end road length. The report prepared by Permit Sonoma on November 19, 2020 states that providing a turnaround and two turnouts on a 10-12 ft wide road approximately 0.4 miles long provides the same practical effect as a 20 ft wide road to ensure concurrent evacuation and fire apparatus ingress. That is simply not true. Concurrent evacuation and ingress cannot occur on a 10-12 ft wide road. Fire engines are 8-9 ft wide, over 10 ft wide including mirrors. Although

**Comments on Mitigated Negative Declaration for the proposed indoor cannabis cultivation
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Deborah A. Eppstein, PhD April 8, 2020

sequential evacuation and fire apparatus ingress can occur using the turnouts, concurrent evacuation and ingress are impossible. Furthermore, the fire prevention evaluation report ignores the other major access road Los Alamos Road, which is 5.6 miles dead end to the private dead-end access road. Los Alamos Road narrows to one lane (12 ft wide) for $\frac{3}{4}$ mile before it enters Hood Mountain Regional Park, and continues for another 0.6 miles until the applicant's shared private road, McCormick Road, exits. The state Attorney General's office has confirmed that the dead-end nature of a road cannot be changed, and the 1-mile length limitation must be met. The MND states that the applicant is looking for a secondary egress via a PG&E utility road (dirt, one lane). Even if such an emergency route were obtained, it would not meet the SRA requirements of 20 ft wide for new development.

When Sonoma County analyzed the applicability of RRD lands for potential cannabis cultivation in 2015, it stated in its report entitled:

Background: Discussion Paper Key Issues and Policy Options

Fire Hazards

Cannabis operations are associated with high fire risk and have been responsible for structure fires in both urban and rural areas. Indoor and mixed light cultivation utilize large amount of electricity and operations have been known to install inadequate or improper electrical equipment, which increases the likelihood of fire hazards. The Sonoma County Hazard Mitigation Plan and GP 2020 designate the majority of RRD lands within the Wildland Fire Hazard Areas as "very high" or "high." Although cannabis cultivation operations would have to obtain proper building and electrical permits, allowing cannabis in this area would increase the number of structures and people that would potentially need emergency protection.

Emergency Services

The remote RRD zoned areas are primarily accessed by one lane gravel roads that are remnants of old logging roads. Most cultivation facilities would be required to construct paved, 2-way roads with an 18 foot minimum width, sufficient for emergency vehicle access. Water for fire suppression may also be required. Emergency response in these areas are handled by volunteer fire departments and response times vary.

Water Availability

The majority of land within the RRD zone is water scarce, and designated Groundwater Availability Class 4 area with low or high variable water yield. This low availability of water is problematic because cannabis needs a sustained amount of moisture.

All of the above concerns are applicable to this application. In addition to the fire danger, the remote location will make emergency response take longer, both for fire as well as combating crime. Other prior cannabis operations in this vicinity had a 45 min response time from the

From: [Deborah Eppstein](#)
To: [Marina Herrera](#)
Subject: comments on MND for cannabis operation 2000 Los Alamos Rd, UPC 17-0041
Date: Thursday, April 8, 2021 10:18:57 AM
Attachments: [2000 LAR Comments on MMD for CEQA 4-8-21 .pdf](#)

EXTERNAL

Hi Marina,

I have attached my comments on the MND for the application UPC 17-0041, for the cannabis operation at 2000 Los Alamos Rd. Let me know if you wish to discuss any points. The issue on the SRA fire safe regulations should be uncontroversial, as the fire road inspection report failed to address the 5.6 mile long dead-end Los Alamos Rd, which clearly violates the state regulations limiting dead-end roads to 1 mile or less..

I will look forward to reading your staff report once its released.

Best regards,
Debby

Deborah Eppstein
801-556-5004

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From: [Dan Levitis](#)
To: [Marina Herrera](#)
Subject: Subject: UPC17-0041
Date: Tuesday, April 13, 2021 8:25:28 PM

EXTERNAL

Dear Marina Herrera,

I am writing regarding Lisa Lai's cannabis agriculture project proposal. More specifically, I am writing regarding Lisa Lai, as my knowledge of the proposal itself is quite limited.

I know Lisa through two channels. First, we are both parents at Flowery Elementary school, where I am the Volunteer Coordinator and PTO Vice President. Before the pandemic I spent an extraordinary amount of time at the school, and got to know a large proportion of the student. I was deeply impressed by the maturity and kindness of Lisa's children, Leilani and Kaia. They both frequently go well out of their way to help and support the younger children. They are tidy, polite, joyful, clever, and responsible, just to name a few. I knew, even before I met Lisa, that they must have excellent role models as parents.

Second, I am employed by Sonoma Ecology Center at Sugarloaf Ridge State Park, where among my duties is managing our online biodiversity database on inaturalist.org. I there encountered Lisa contributing high quality natural history observations to our database. In the ensuing conversation, I learned of her deep love of, and care for, our native plants and animals, and deep concern about water quality.

In short, I know Lisa to be an excellent parent and active community member committed to responsible environmental practices.

I am happy to answer any questions you have should that be helpful.

Sincerely,
Daniel Levitis Ph.D
120 Calle del Monte, Sonoma, CA 95476
207-440-0062

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From: [Grace Barresi](#)
To: [Marina Herrera](#)
Subject: Comments on UPC 17-0041
Date: Thursday, April 8, 2021 11:33:00 PM

EXTERNAL

Dear Ms. Herrera,

Thank you for giving me the opportunity to voice my concerns about the proposed Conditional Use Permit, UPC 17-0041. I am opposed to the approval of this permit because the parcel is in a Class 4 scarce water zone, the project uses groundwater and the removal of 38 protected trees. This project will result in major environmental impacts, as evidenced by letters from National Oceanic and Atmospheric Administration (NOAA) and California Department of Fish and Wildlife (CDFW) and is in an inappropriate location. Please deny this permit.

1. Class 4 water zone: This parcel is in a Class 4 water zone which is water scarce. In March 2021, the Planning Commissioners recommended prohibiting cannabis cultivation in these scarce water zones (Class 3 and 4) when reviewing the proposed cannabis ordinance revisions. They recognized cannabis is a water intensive agricultural product and class 3 and 4 zones are inappropriate locations for the cultivation of cannabis.

2. Groundwater use: The applicant proposes to use groundwater as well as well water as a water source for the cultivation of cannabis. According to your assessment, ***"All of the parcels are in areas of low or highly variable water yield (Class 4). The proposed project's most conservative annual water demand (without subtracting anticipated offsets from rainwater or greywater capture and reuse) increases the current total water demand within the cumulative impact area by only 7.0%. The combined project contributions are not anticipated to rise to a cumulatively considerable level. Significance Level: Less than Significant Impact"***.

And, yet, this analysis of ground water is flawed. The analysis was prepared in July 2018, but the actual analysis for ground water recharge was based on 2010 (reference page 11). "Groundwater recharge was simulated for Water Year 2010 which was selected as precipitation was close to the 30-year average for much of Sonoma County".

The National Oceanic and Atmospheric Administration (NOAA) recently expressed concerns about the use of groundwater in a letter to Tennis Wick, Director of Permit Sonoma, dated February 26, 2021. According to NOAA in their analysis of the SMND,

"Groundwater is the predominant source of water for cannabis cultivation operations within Sonoma County. State Water Board regulations concerning surface water diversions for cannabis cultivation contain required best management practices (BMP's) highly protective of instream flow volume and fish habitat, such as

requiring summer forbearance, winter diversions, and fish friendly bypass flows. However, similar BMP's are not required by the State Water Board for cultivation sites utilizing groundwater wells as a source for cannabis cultivation. Because of this discrepancy under state law, the vast majority of cannabis cultivation applications throughout the County are opting for groundwater wells as their water source. **We are concerned in particular, that wells are being drilled and pumped without appropriate analysis regarding their potential impact to surface water, especially near-stream wells that may also impact groundwater/surface water dynamics and result in streamflow depletion. With those concerns in mind, we offer the following comments.**

Re Page 70, Section 10(b): The MND states the following: "Future cannabis facilities in rural areas would rely on either surface (rivers, lakes, and springs) or well water sources. Accordingly, the introduction of cannabis cultivation in these areas could increase the use of groundwater. As explained above, very few rural cultivation sites are currently using surface water diversions as a water source, likely to work around the required BMP's mandated by the State Water Board for surface water diversions. NMFS is concerned about both surface water and groundwater diversions, as they are linked, and we believe the potential for impacts from unrestricted groundwater use is high".

California Department of Fish and Wildlife (CDFW) also expressed concerns about the use of groundwater for cannabis cultivation in a letter addressed to McCall Miller, dated March 17, 2021: "CDFW is concerned about the impact of groundwater diversions and their potential to deplete surface water (e.g., rivers and streams) and affect groundwater dependent ecosystems.

The U.S. Geological Survey, in cooperation with the Sonoma County Water Agency, the cities of Cotati, Rohnert Park, Santa Rosa, and Sebastopol, the Town of Windsor, the California American Water Company, and the County of Sonoma, undertook development of a fully coupled groundwater and surface-water model to better understand and to help manage the hydrologic resources in the Santa Rosa Plain watershed (Woolfenden and Nishikawa, 2014). According to the modeled result from that report, "increased pumping lowered groundwater levels, causing increased recharge and reduced groundwater evapotranspiration along stream channels, which partially mitigated the loss of groundwater storage, but the lower groundwater levels resulted in decreased baseflow, especially during late spring and summer."

We are in a major drought and will likely have to conserve water in Sonoma County and, yet, **Permit Sonoma is recommending approval of this application despite significant concerns addressed in writing from two highly reputable state agencies, NOAA and CDFW.**

3.Tree removal and grading of land: The applicant is requesting the removal of 38 (thirty-eight) existing trees to clear the land for new buildings. The applicant states none of the trees compose designated forest land. Has Sonoma County verified the diameter and size of these trees? What species are these trees? Are these oak trees that are protected? In your report, "*The project site does not include any riparian habitat or natural community identified as rare in the CNDDDB. However, one sensitive vegetation community, oak woodland, previously referred to as*

“montane hardwood forest”, occurs on the project site. Oak woodlands are protected by state law (Public Resources Code Section 21083.4, see directly above). Project-related impacts to oak woodland would include the removal of at minimum 26 native trees within the oak woodland community that are protected by the Sonoma County Tree Protection Ordinance.”

The Less than Significant assessment is at odds with your statements above. How can the removal of 38 trees be less than significant? On page 34, you also state:

“The proposed project would be required to adhere to all general provisions, tree protection methods during construction, and compensatory mitigation requirements of the Sonoma County Tree Protection Ordinance (Sonoma County Code of Ordinances, Chapter 26, Article 88, Sec. 26-88-010 [m]). As compensatory mitigation for the loss of protected trees, the applicant will be required to plant replacement trees and/or issue payment of in-lieu fees that may be used to acquire and protect stands of native trees in preserves or place trees on public lands”.

If these trees are protected, how can Sonoma County allow them to be removed? Is this trickery how Sonoma County plans to approve these projects, by stating factually that protected trees would be lost but then stating the impact is less than significant because the applicant will plant trees to replace them? Planting trees to replace the removal of these trees will take years to grow and it's unlikely that planted trees will grow given the current drought we are experiencing.

California Department of Fish and Wildlife (CDFW) has expressed concerns about tree removal in their letter to Sonoma County. CDFW recommends the following:

“The Project avoids large diameter tree removal (e.g., 15-inches and greater), prohibits loss of oak woodlands and conversion of timberland, and avoids special-status botanical resources. On-site tree replacement should be considered as a potential impact minimization measure, but not sufficient to completely offset temporal impacts from loss of large mature trees. CDFW recommends Project mitigation from loss of large trees on-site, and potentially should include off-site preservation of trees in perpetuity. Additionally, any on-site tree protection and replacement plans should include specific tree and understory performance criteria, with monitoring and management of the replaced trees”.

Deny this permit. It's not in an appropriate location for large scale cannabis cultivation given the significant water use in a scarce water area and the denuding of trees from the land. This area experienced a major fire last year and there is even more reason to conserve oak trees, as they have a chance of recovering whereas many other trees do not, and the habitat of animals is very stressed post fire and depend on these trees.

Sonoma County property owners were sued because they removed one oak tree from their property and had to pay \$600k. Permit Sonoma would allow the removal of 38 trees from this property, with a conditional use permit. Something is amiss.

<https://www.mercurynews.com/2019/05/10/a-couple-uprooted-a-180-year-old-oak-a->

[judge-ordered-them-to-pay-nearly-600000/](#)

Thank you for your attention,
Grace Barresi
Sebastopol

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From: [Jamie Ballachino](#)
To: [Marina Herrera](#)
Subject: UPC17-0041
Date: Thursday, April 1, 2021 7:21:39 PM

EXTERNAL

I support Lisa Lia's cannabis farm. She is one of the original Sonoma County growers who stepped forward when participation was incredibly low, has abided by the rules, and paid her taxes. Her permit application has been in process for an incredibly long time. She is one of the Sonoma County Legacy Farmers that were promised priority. Please treat her kindly! She's come such a long way and been through so much.

Sincerely,

Jamie Ballachino
President
Hands in the Earth, Inc.
License #:
CCL18-0000131
[1415 Fulton Rd.](#)
[Santa Rosa, Ca](#)
Suite 205-238
Email:
Jamie@HandsInTheEarth.com

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From: [Joanna Cedar](#)
To: [Marina Herrera](#)
Subject: Lisa Lai, All Cali Farms, LLC. Permit Sonoma File No. UPC17-0041
Date: Thursday, April 1, 2021 5:58:41 PM

EXTERNAL

Ms. Herrera,

I am writing in support of the application for a Conditional Use Permit for Lisa Lai of All Cali Farms. Her project has met all the requirements for local approval, is appropriate for the parcel size and character and will be an excellent addition to the county's cannabis program.

I urge approval of the project.

Thank you,

Joanna Cedar
Principal Consultant
The Cedar Group
joanna@cedargroup.org
(707) 953-5829

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From: [Kila Peterson](#)
To: [Marina Herrera](#)
Subject: UPC17-0041
Date: Thursday, April 1, 2021 6:43:16 PM

EXTERNAL

To whom It May Concern,

I am writing in support of Lisa Lia and All Cali Farm. I have gotten to know Lisa through the small Sonoma County Cannabis community associated with the Hessel Farmers Grange. She is a passionate cultivator, a leader, a team player, and dedicated to the cannabis community. I have never seen someone fight so hard for her dream of growing legal Sonoma County cannabis and obtaining the elusive Sonoma County CUP permit. She has jumped through every hoop and hurdle that dropped on her, dealt with a neighbor that is a rabid anti-cannabis opponent.

Lisa, has been operating compliantly for many years and has built a family business around it, and has deep roots in the community. To displace her would mean an economic hardship that would be insurmountable. She has already invested so much time and money into her CUP. Please seriously consider all the stakeholders in any decision in regards to the Original Penalty Relief applicants.

If our small struggling cannabis Community loses a member like Lisa, it would be a travesty. Sonoma County has put Penalty Relief applicants through years of uncertainty and has almost bankrupt most of the small cultivators. Please do not let Lisa fail because of the County's lack of transparency, leadership, and support. Each small legacy cultivator that succeeds is a financial benefit for the County.

Thank you for your time.

Best,

Kila Staub

Sent from my iPad

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From: [Monica Boettcher](#)
To: [Marina Herrera](#)
Subject: UPC 17-0041
Date: Friday, April 9, 2021 5:08:49 AM

EXTERNAL

The applicant has requested a variance from the 1000 ft park setback for a greenhouse. For the safety of the community, please do not yield on park set backs.

Monica Boettcher

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From: [Mark Cederborg](#)
To: [Marina Herrera](#)
Subject: UPC17-0041
Date: Friday, March 19, 2021 10:16:29 AM

EXTERNAL

Hi Marina,

I wanted to write to express my support for Lisa Lai's proposed cannabis farm. I have lived and owned a home in Sonoma Valley for 12 years, and have resided in Sonoma County since 1985. My company has been based in Sonoma County since 1984, employs 110 people – most residing in Sonoma County – and contributes significantly to the community including over \$500K in the last 2 years to the Community Foundation of Sonoma County. I've known Lisa for 6 years personally and professionally. She is an upstanding citizen, dedicated to her family and business. She cares about her neighbors at the farm location, having expressed her concerns and respect for her neighbors to me on a number of occasions. I've also been very impressed with her dedication to following the rules, process and protocol both at the state and local level to ensure the validity and success of her business. I am confident she will be an example of success with her business, as a community member, neighbor, and not least, how to successfully navigate the regulatory process to build a business in Sonoma County.

Thank you and I am happy to provide any additional information to support her business proposal.

Mark Cederborg
(707) 975-3105



Mark Cederborg
Chief Executive Officer
Main 707.996.6633 | Direct 707.975.3105
m.cederborg@hanfordarc.com
755 Baywood Dr. Suite 380, Petaluma, CA 94954
www.hanfordarc.com

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From: [Mark Evans](#)
To: [Marina Herrera](#)
Cc: [Mark Evans](#)
Subject: Re: UPC17-0041
Date: Wednesday, March 17, 2021 6:12:19 PM

EXTERNAL

Wednesday, March 17, 2021

Dear Marina Herrera - and To Whomever it May Concern:

As the owner of the parcel, AP# 030-050-008, directly adjacent to the parcel owned by Joe Henderson, Realtor, and leased by Khi and Lisa Lai, {AP# 030-050-009} I wish to state - for the Record - that Lisa Lai is an upstanding and decent neighbor - and eminently worthy of receiving all considerations as far as the facilitation of her Cannabis Cultivation License goes.

These people are among the Best and most decent among the cultivators of Medical Cannabis in Sonoma County. Lisa is a credentialed Biologist and accomplished Botanist. She and her husband Khi are as far removed from the criminal element that practice Cannabis Cultivation on the North Coast, as they possible can be. They are a family business, with Green degrees from Humboldt State University.

On the night of September 27, 2020, Lisa called me from her home in Sonoma Valley, and informed me about the Fire that was proceeding South towards Los Alamos Canyon, from St. Helena Road. In doing so, she saved my life. I can not thank her enough. She is a Good neighbor and a worthy candidate for a Cannabis Cultivation License.

Sincerely,

Mark Walter Evans
2001 Los Alamos Road
Santa Rosa, California
95409

Property Owner of : AP# 030-050-009

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From: [Rachel Zierdt](#)
To: [Marina Herrera](#)
Subject: UPC 17-0041
Date: Thursday, April 8, 2021 2:57:36 PM

EXTERNAL

Dear County of Sonoma Permitting of Cannabis Department,

I am writing about my concerns with the permitting of this grow. Initially it was on the PRP which I understand was not to be expanded....and here you are allowing to do that.

Another issue is its remote location in a very high fire zone. The area has already burned recently and the long dead end road has not been improved. Many persons along Los Alamos have already lost their homes. Has the county not learned that lesson already?

Additionally this is a class 4 water zone which makes it a water scarce zone. How can you condone using precious water on such a water intensive crop?

Saying that the park's thick vegetation is a barrier is preposterous. The thick vegetation is now burned.

Allowing grading and tree removal on such a stressed area should not be permitted. Erosion is a distinct possibility.

Overall this is a terrible piece of land to allow a permit. Ask the tenant farmer to go elsewhere for a more suitable grow site.

Regards,
Rachel Zierdt

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PRMD Planning Staff
4233 Ventura Ave
Santa Rosa. CA 95403

March 19, 2021

RE: Support for UPC17-0041 for Lisa Lai, All Cali Farms, LLC.

To whom it may concern,

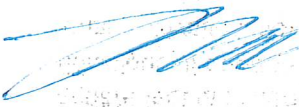
I am writing this letter in support of approving UPC17-0041 for applicant Lisa Lai, owner of All Cali Farms, LLC. I have known Lisa for several years now, and can tell you that she is by far the nicest and most environmentally conscious person I have met in the cannabis industry.

What Lisa has had to go through with the PRMD penalty relief program over the last four years, and to still not already have her permit is almost criminal. The amount of money that All Cali Farms LLC has had to spend with the Use Permit process to date with the county for a Use Permit application for 2850 square feet of mixed lighting; 3,799 square feet indoor cultivation; and, 1020 sq.ft. processing permit, is ridiculous. If approved, and once operational it will take years for Lisa to earn enough of a return on her small cultivation plot to earn the money back that she has spent on the PRMD permitting process. Please process and issue her permit application UPC17-00041.

Not only does the All Cali Farms project have no negative environmental impact, it actually improves the environment. I have witnessed Lisa help wildlife with hanging bird houses, bat boxes, planting native flowers and even starting an apiary. Her farm is a model of the small family farm and of sustainable environmentally friendly agricultural practices. All Cali Farms is a small premium quality farm producer. Just like the many small family owned vineyards, and produce gardens that are a vital part of sustainable agriculture in Sonoma County, and the local economy. The UPC17-0041 application is for mixed lighting and indoor cultivation. With best management farming practices and sustainable farming All Cali Farms will not have a negative impact on the environment.

As a legacy cannabis cultivator, All Cali Farms has been an integral part of the developing Sonoma County cannabis industry. I urge PRMD Planning staff, the Sonoma County Board of Supervisors to approve this small premium cannabis cultivation operation and allow All Cali Farms LLC to continue being a vital part of the local cannabis cultivation community.

Respectfully,


Ron Ferraro

5355 SKYLANE BLVD, SUITE A | SANTA ROSA, CA 95403
707.709.6040 | OFFICE@ELYONCANNABIS.COM
ELYONCANNABIS.COM

From: [Sandra Saldana \(Miranda\)](#)
To: [Marina Herrera](#)
Subject: Subject: UPC17-0041
Date: Saturday, March 20, 2021 12:44:19 PM

EXTERNAL

Hi Marina,

My name is Sandra Saldana, I am local educator and have lived in Sonoma since 2007. I am raising two children in Sonoma, this my home.

I am writing in support of Lisa Lai and at All Cali Farms. I am enjoying sourcing local products. All Cali Farms is one of my favorite local producers. I was upset to hear that she lost her farm in the Glass Fire, and would be excited to see her product back on shelves.

I find Lisa to a be lovely person and we should always support local. Lisa is very knowledgeable and has been helpful to me in regards to which products I should use for my ailments.

I encourage you to grant her permit.

Sincerely,

Sandra Saldana
Sonoma, CA

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From: [Tony Linegar](#)
To: [Marina Herrera](#)
Subject: All Cali Farm (UPC 17-0041)
Date: Saturday, March 20, 2021 9:08:16 AM

EXTERNAL

Dear Marina,

Please include this letter of support in the record for the All Cali Farm project owned by Lisa Lai. As the recently retired Agricultural Commissioner of Sonoma county, I am familiar with Lisa and her efforts to legalize her farm. Lisa is a small, local, legacy farmer who has been active in the public process since Sonoma County began developing cannabis policy. She has contibuted thoughtful, reasoned and objective input designed to make the program more workable for small, local farmers. In my tenure as Agricultural Commissioner, I found Lisa to be conscientious and committed to producing a high quality product on a small scale. She has always shown a propensity to take the regulations seriously and has made compliance a priority in her business operations.

Lisa has shown great patience while navigating the conditional use permitting process since 2017. She has invested a tremendous amount of time, energy and money into doing things the right way. Lisa Lai and All Cali Farm are exactly the type of cannabis business that we should be permitting in Sonoma county. She has shown exemplary leadership and a committment to the legal marketplace that can serve as an example to the local industry. I urge approval of the use permit for All Cali Farm. Perhaps her committment and persistence will inspire other growers to enter the legal market.

Thank you for your consideration,

Tony Linegar
Retired Agricultural Commissioner
County of Sonoma

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