


From: kbparr@sonic.net
To: [Cannabis](#); [Crystal Acker](#); [Scott Orr](#)
Subject: Additional comments
Date: August 23, 2021 3:26:28 PM
Attachments: [Franz Valley Small Group Session Talking Points - Aesthetics.pdf](#)


Crystal and Scott,

Attached, please find my talking points from the Franz Valley Small Group meeting earlier today. Thank you again for your time.

Kind regards,

Michele Parr

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Franz Valley Small Group Session
Sonoma County Cannabis Program Update
August 23, 2021
11:00 am

Aesthetics

Aesthetics are one of the environmental impact topics which make up CEQA. The topic, as it relates to cannabis cultivation must be studied and the findings included in the EIR.

Franz Valley is a bucolic setting, with scenic vistas and rural character. The Franz Valley Area plan was adopted in 1979 and modified in 2012 to reinforce conservation, wildlife habitat and agricultural management, among other things. Sonoma County sought neighborhood input in an effort to draft and implement the Plan.

Franz Valley Road has been designated a scenic corridor as seen in the map, here. (slide 26).

The area, as enjoyed by neighbors, as well as visitors, should be free of the visual aspects related to a cannabis operation.

The slides included here illustrate the visual impact cannabis operations could make and what we find unacceptable. Here are some examples:

- Hoop houses
- Volumes of plastic containers
- Cannabis compost waste
- Processing facilities and related buildings
- Large security gates, fences and structures, creating a fortress-like appearance
- Outdoor lighting used for grow operations and security that illuminate the night time sky and invade neighbors' homes after dark

Cannabis cultivation would negatively impact the scenic setting and peaceful rural character of the area.

Therefore, cannabis cultivation is unacceptable in Franz Valley and Franz Valley should be an Exclusion Zone.

From: kbparr@sonic.net
To: [Cannabis](#); [Crystal Acker](#); [Scott Orr](#)
Subject: PowerPoint Presentation
Date: August 23, 2021 3:25:26 PM
Attachments: [CannibisPres_Lawer_Draft17pptx.pdf](#)

Crystal and Scott,

Thank you for allowing our group to make a presentation regarding the Cannabis Program Update on behalf of Franz Valley. We appreciated your time, as well as the opportunity to express our views and identify the areas of study for the EIR.

Attached you will find the PowerPoint Presentation used in the Zoom meeting.

Kind regards,

Michele Parr

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*FRANZ VALLEY
SONOMA COUNTY
CANNABIS PROGRAM UPDATE
SMALL GROUP SESSION
AUGUST 23, 2021*



FRANZ VALLEY COMMUNITY PERSPECTIVE

Franz Valley community members believe cannabis grows are unacceptable and entirely unsuitable to our community for reasons we will explain.

We advocate that Franz Valley be an Exclusion Zone from cannabis grows for the following reasons:

- Water Zone 3 - marginal groundwater
- High Fire Risk Zone - history of catastrophic wildfires
- Box canyon the traps and amplifies sounds and will trap and concentrate odor
- Narrow, winding roads and concerns for traffic safety
- Chaotic and dangerous evacuations from wildfires
- Cannabis is crime-attracting and Franz Valley is remote from emergency responders



FRANZ VALLEY COMMUNITY PERSPECTIVE

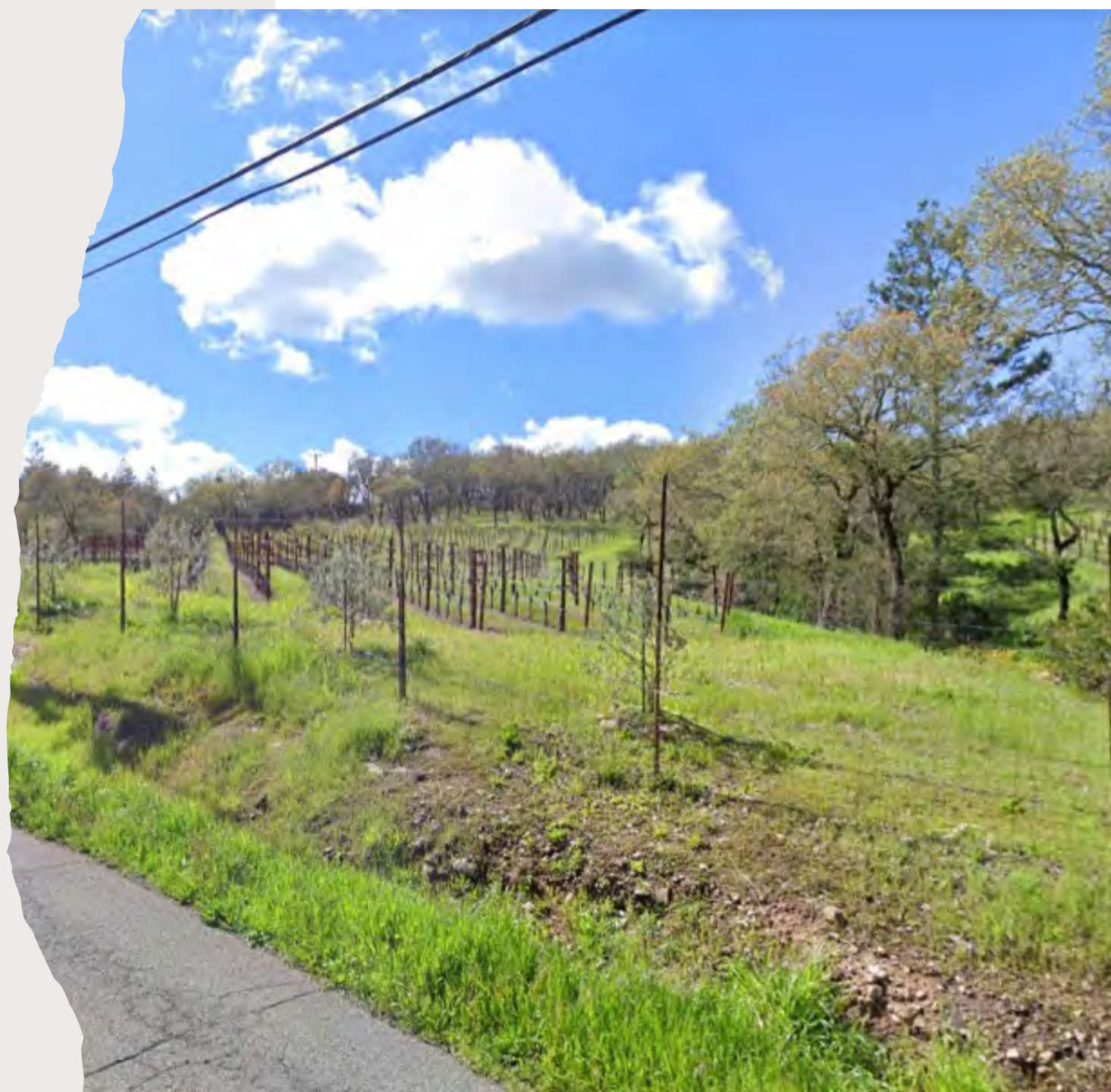
Franz Valley community members believe cannabis grows are unacceptable and entirely unsuitable to our community for reasons we will explain.

We advocate for a baseline survey of current conditions, to include:

- Water/hydrology report- and outlook for 1, 5, 10 , 20 years
- Riparian and wildlife survey
- Air quality report - with odor circulation/recirculation measurements
- Full fire risk evaluation

For the reasons you will be hearing in our presentation, we advocate for:

- Moratorium on all cannabis permit applications - County-wide - pending comprehensive in-depth, science-based EIR
- Moratorium on all permitting activities that increase water usage - County-wide



FRANZ VALLEY

While Franz Valley is divided by the Sonoma / Napa County line on Franz Valley School Road, the community works together on all issues that impact safety and quality of life. Activism and engagement have been hallmarks of Franz Valley residents for decades.

- The (approximate) population of Franz Valley: 120
- Participation in COPE (Citizens Organized to Prepare for Emergencies): Nearly 80 percent
- Participation in the neighborhood communications system "GroupMe": Nearly 80 percent
- The Franz Valley Mothers Club is a 111-year-old activist and support "institution" that tackles Franz Valley - and Sonoma County -- issues and concerns.



FRANZ VALLEY

The short distances that define *Franz Valley*:

Running East and West:

- From the Franz Valley Road / Franz Valley School Road intersection to Petrified Forest Road: 6.3 miles.
- (The Sonoma County Line is at mile 2.7)

Running North and South:

- From Porter Creek to Highway 128 on Franz Valley Road: 7 miles





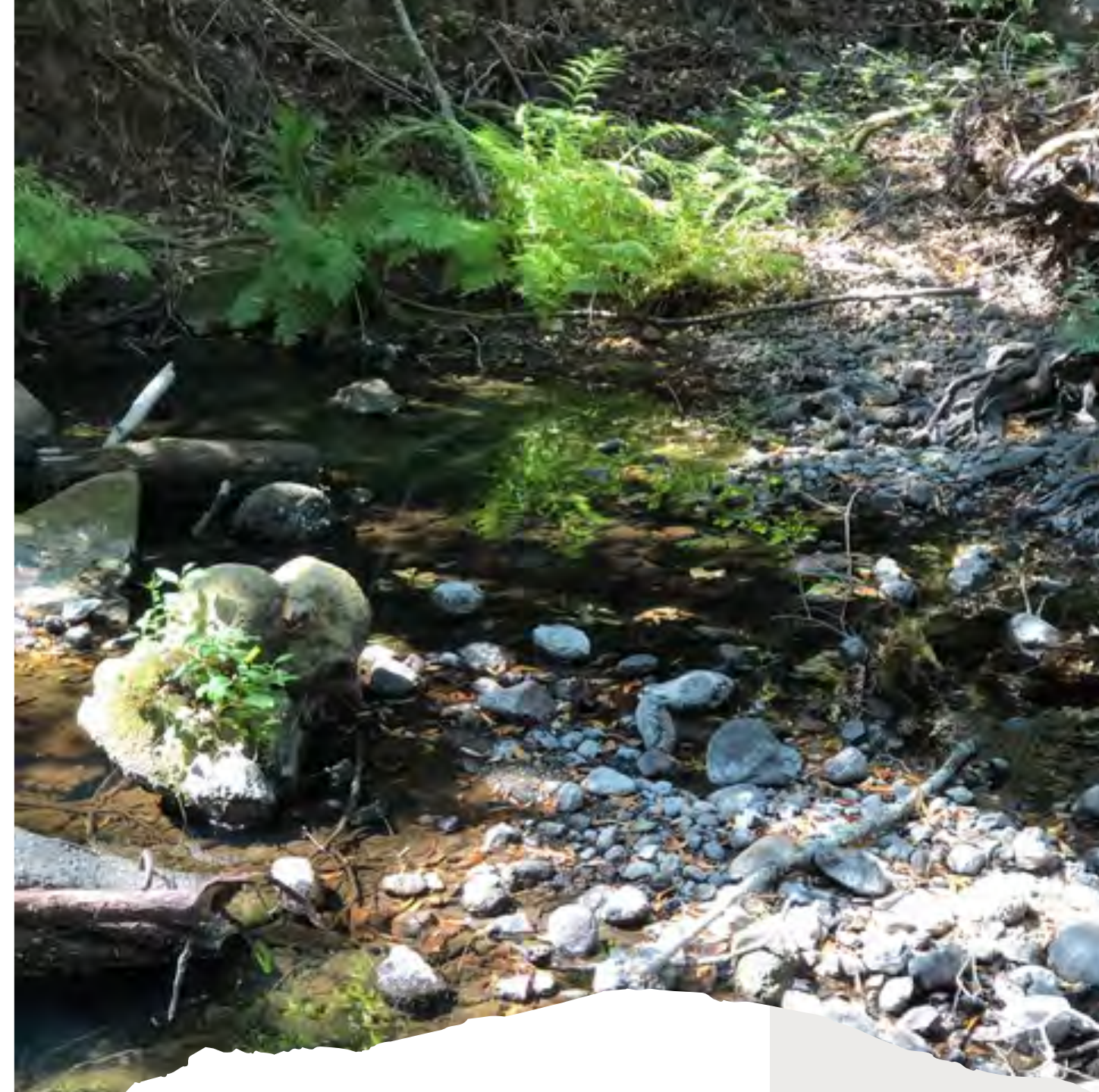
*THREE ARGUMENTS AGAINST
CULTIVATION OF CANNABIS
IN FRANZ VALLEY DUE TO
WATER RELATED ISSUES:*



1. According to the 1979 Franz Valley Specific Plan and the modified May 22, 2012, version (Resolution No. 12-0280), Franz Valley is in a marginal water availability area, zone 3. There should be a ban on all permits, pending or new applications for Cannabis cultivation and new wells for that purpose. Franz Valley is NOT suited for Cannabis plants due to their high-water usage of 1.5 to 3 million gallons of water per acre per year, most of which is used during the driest time of the year.



2. All residents living in Franz Valley are on wells. There should not be a further drain in a marginal water availability zone 3 that will jeopardize the existing residences.



3. The only surface water is Franz Creek which empties into the Russian River. It is reduced to a trickle and small pools during the summer which is home to the California Freshwater Shrimp, (a federally endangered species) and Steelhead fingerlings, (also federally endangered species). Increased usage of water will further limit what water reaches the creek.

ADDITIONAL ARGUMENT

- Further argument against Cannabis growing in Franz Valley, not entirely related to water issues is the fact that the 1979 Franz Valley Study rates Franz Valley as “showing that 80% of the area has extreme fire hazard, 10% high and 10% moderate”, based on weather, slope and fuel load. The catastrophic Tubbs fire of 2017 followed the exact path of the Hanly fire of 1964. Planting highly flammable Cannabis plants in Franz Valley should be banned.



THE FRANZ VALLEY CWPP

The *Franz Valley Community* contracted with Wildland Resource Management in 2020 to prepare a comprehensive *Community Wildfire Protection Plan*.

The Plan was presented in Spring 2021.

The consultant's findings reinforce and confirm alarms that large-scale, Coordinated, vertically integrated commercial cannabis grow operations amplify the high risks *Franz Valley* already faces:

- *Water shortages* and watershed impacts,
- Fire and emergency response challenges,
 - Ecological and *soil degradation*.

FROM THE CWPP DOCUMENT:

Franz Valley is a small, boxed-in valley with two centered knolls which act to separate Franz Valley into two areas north and south of those knolls (also bisected by Franz Valley School Road).

During northeast wind conditions, Franz Valley receives accelerated winds from the canyons in Knights Valley.

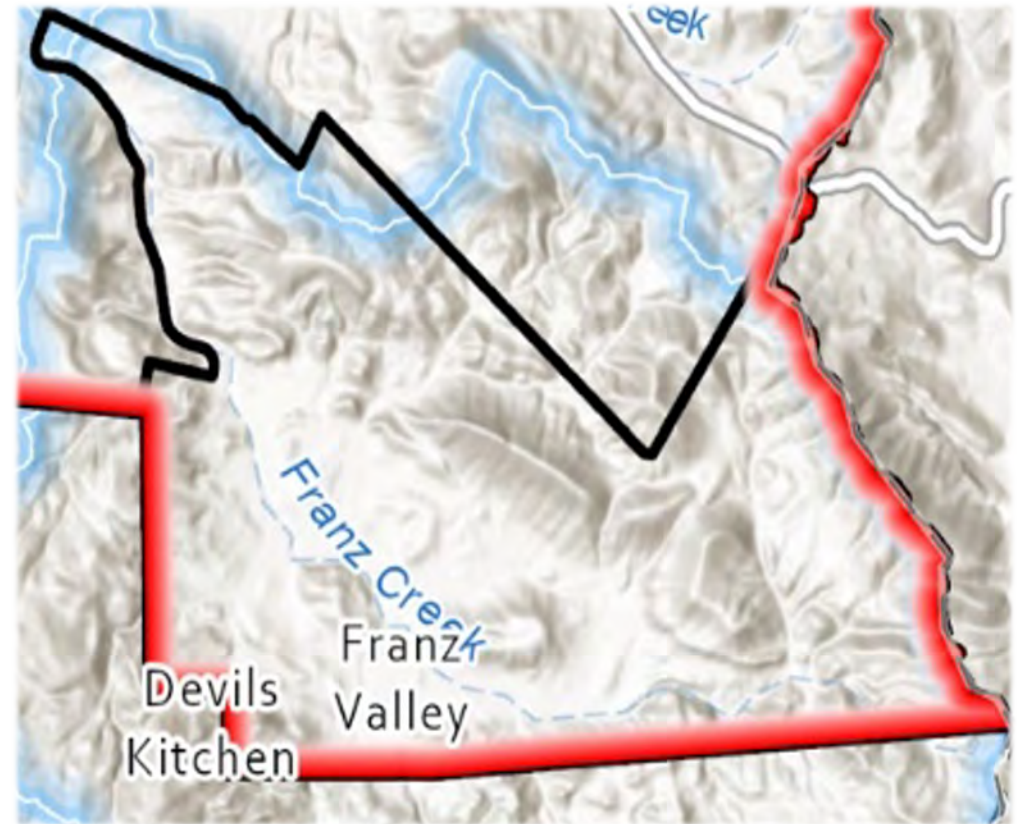
This boxed-in valley and southwestern-facing aspect of Franz Valley exacerbates its risk from the Diablo Winds because these subsiding winds accelerate with decreasing elevation.

Portions of the Knights/Franz Valley neighborhood lie in a relatively protected area and would be subject to occasional episodes of still, stagnant air formed by stationary highs during summer months.

This overall weather pattern -- characterized by continuous high temperatures and low relative humidities -- enhances the possibilities of ignition, extreme fire behavior and extreme resistance to fire control.

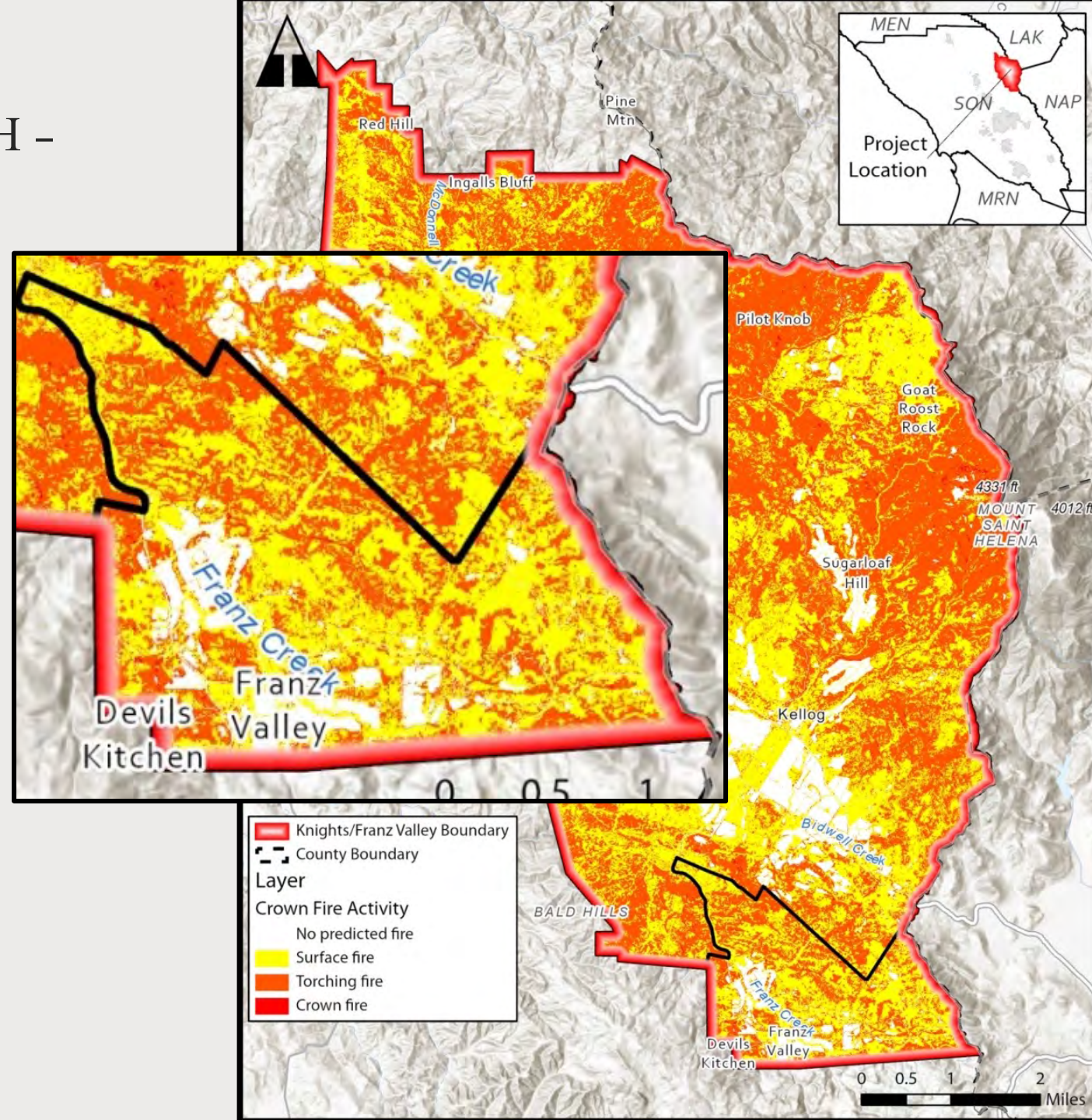
EVACUATION AND FIRST RESPONDER ACCESS

- Most lengths of the often very winding roads are barely two lanes, with no shoulders.
- Despite the low density of residential use, congestion on these narrow road was significant during evacuation.
- Franz Valley's unique patchwork of government entities - involving two counties, two Sonoma County Supervisorial Districts, and three Fire Protection Districts - has often resulted in confusion and has slowed reaction to both urgent and ongoing matters.



CANNABIS IS A HIGH-OIL CONTENT FLAMMABLE PLANT

- Unlike cannabis, vineyards are fire-suppressing. Vineyard biomass is concentrated in live vines, with a mowed or bare soil surface.
- Vineyards were instrumental in stopping the Howell Mountain fire in 1983, formed the edges of fires in the Tubbs, Nunns, and Kincadee Fires.



AIR QUALITY

- Waste Management
- Processing
- Odor

WASTE MANAGEMENT

- Composting
 - Chopping
 - Pesticides
 - Drift
 - Cumulative impact on landfills
 - Environmental impact of tilling and composting
-
- Each of the 11 applications states that “Cannabis waste should never exceed four cubic yards per week.” One of the challenges of considering this commercial grow operation over 30 acres, is that the applications are considered as individual $\frac{1}{4}$ acre grow operations. The cumulative effect of the entire commercial operation is not analyzed. For instance each $\frac{1}{4}$ acre grow operation might not exceed four cubic yards per week, but over the 11 permit operations, that is 44 cubic yards per week.

WASTE MANAGEMENT

- The compost pile generated by that waste will be stationed at the edge of the cultivation area where the garden rows begin. 44 cubic yards of materials to be compost in just a week is a huge pile, and, over time, it will grow significantly.
- How will that growing compost pile be managed? If chopped, will the pile be covered, so that there will not be any particle drift from the compost. Will there be a perpetual order from the growing compost pile that will drift to neighbors?
- According to the application, those 44 cubic yards per week, does not include root balls, stalks, etc., which will be tilled directly into the agricultural land.
- What is the quality of the compost and the materials that are tilled directly into the agricultural land? What will be the cumulative impact on the environment in the future?
- Has Sonoma County forecasted the impact on landfills of cannabis waste materials?
- I have digressed a bit from the air quality portion of plant materials waste management, but as I learned more about the challenge, it appeared to me that managing cannabis harvest waste is a significant challenge – for the cumulative impact on landfills and the environmental impact on soils as the plant waste is tilled into the soil, particularly if there is no pesticide oversight during the grow season.

PROCESSING

- The Franz Valley community believes cannabis processing should only be done in an industrial zone. Please confirm that there will be no processing done on the Franz Valley site.
- The applicants state: No waste material will be generated from processing activities, (eg., drying, trimming, etc.) since all cannabis material will be transferred off the site immediately after harvest.
- The Franz Valley community believes processing should only be done in an industrial zone. Please confirm that there will be no processing done on the Franz Valley site.
- The applicants state: No waste material will be generated from processing activities, (eg., drying, trimming, etc.) since all cannabis material will be transferred off the site immediately after harvest.

ODOR

- Skunk smell from cannabis plants
- “Boxed” valley: odors will be concentrated and lingering
- Quality of life
- Health impacts of long term breathing skunk smell
- Reduced property values and resulting impact on property tax revenues
- 1,000 different cannabis terpenes
- Nearly 100 acres of prime vineyards immediately surrounding the proposed vertically integrated commercial cannabis grow operation across 30 acres
- No scientific studies about the impact of cannabis terpenes on wine grapes, general thoughts are that they will have the same impact on wine grapes as eucalyptus
- Risk to vineyard operations of grape buyers backing away from grape contracts due to concerns about cannabis terpene impact on the grapes
- Direct impact on property tax revenue, business income revenue and broader impact on tourism tax revenue

ODOR

- Cannabis, frankly, has a stinky “skunk” smell. Who wants to live in stinky skunk smell? And, moreover, how will that skunk smell impact the almost 100 acres of vineyard production immediately adjacent to the proposed cannabis operation?
- Franz Valley is a small, narrow “boxed” valley. The lovely maritime breezes that come through the valley every afternoon, ones that contribute to the balance and acidity of the premium and ultra premium grapes grown in Franz Valley, will also hold and concentrate that stinky skunk smell in the valley. It will not dissipate over a broader valley that does not have surrounding hills to “box” it in. As a result, in Franz Valley, odors will be stronger, more persistent and hang around longer than they may in other areas.

ODOR

- That strong, lingering stinky skunk smell will impact the quality of life for Franz Valley residents. And there have yet to be any scientific studies about the long-term health impacts of breathing cannabis stink by adults, teenagers and children.
- Moreover, the strong, lingering cannabis stink in the air will impact the ability of Franz Valley residents to sell their properties at fair market value. They will likely need to take a steep market discount. Given the other alternatives, who would want to purchase a property and smell cannabis stink?
- There have already been a number of law-suits about the impact on property values by cannabis stink.
- Has the Board of Supervisors quantified the potential loss of property tax revenue caused by lowered residential property values in cannabis areas?
- Cannabis growers won't look for less potent plants anytime soon, in fact, if the trend continues, the demand will be for more potent, and stinky, plants. Why? Because smell might be a perceived indicator of quality. It has become apparent that the more potent marijuana varieties spark more interest and a willingness to pay higher prices.

ODOR

- The skunk smell actually comes from terpenes, tiny volatile molecules created by the cannabis plant. These terpenes are the aromatic component of the plant's essential oils. Cannabis plants produce more than 1,000 different types of terpenes. While only a few can be distinguished by the human nose, there has been no scientific study as to the impact of these terpenes on wine grapes.
- I have confirmed with a number of testing labs, that there is no scientific study about the impact of cannabis terpenes on wine grapes. A number of the people in labs that I spoke with, assumed that the impact would be the same as that of eucalyptus terpenes. And there have been studies conducted which document that impact on wine grapes.
- There are almost 100 acres of vineyards immediately surrounding the proposed vertically integrated commercial cannabis grow operation across thirty acres in Franz Valley. And double that if other nearby vineyards are considered.
- Franz Valley, with its unique terrior, which provides heat to develop flavors during the day and the maritime breezes for cool evenings and nights that fosters acidity has a great reputation for producing quality premium and ultra premium wine grapes. The threat of lingering skunk stink that could taint the grapes is a real threat to businesses in Franz Valley, which now have second generations involved in the business. What winery owner, in his or her right mind, would want to take the risk of buying fruit grown in skunk stink to put in a bottle with their name on it?

In summary, the current application process for the proposed cannabis cultivation in Franz Valley does not provide enough information to thoughtfully understand the impact on the neighborhood – the quality of life due to odors, property values or the impact on existing vineyards. Neither does the application process consider the environmental impact – management of harvest waste. And it does not take into consideration the increased impact of concentrated, lingering odors from cultivation in the unique box valley geography that is Franz Valley, with the daily maritime breezes holding those concentrated odors in our valley.

RESPECTING THE
COUNTY'S
FRANZ VALLEY
SPECIFIC PLAN

In 1979, Sonoma County adopted the **Franz Valley Specific Plan**.

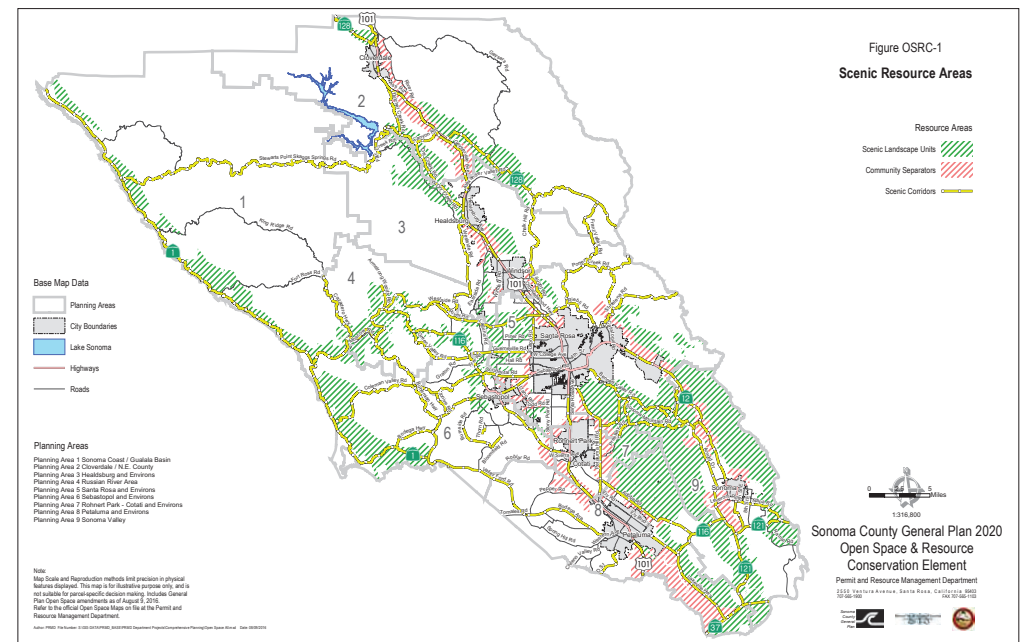
The Plan was Last Modified by Resolution in May 2012

Relative to other areas of Sonoma County, the Franz Valley area remains of major importance as an area of resource conservation.

1. Large blocks of lands of limited access and marginal economic productivity are extremely important for **maintaining and building soil**, recharging groundwater, producing oxygen and consuming carbon dioxide, **moderating climate**, and sustaining biological diversity and **genetic adaptability to future change**.
2. An additional **human benefit** resulting from resource conservation areas is the preservation of some of the County for **tranquility**, the **freedom** from urban noise and congestion necessary for **spiritual growth and artistic exploration**.
3. Scientific and educational uses of these areas are also important. **Pepperwood Preserve** is located on the western ridge of Franz Valley. The Preserve is dedicated to studying the impact of climate change on our environment.

AESTHETICS

- Impact of Cannabis grow sites and related **infrastructure** on the scenic vistas and **rural landscape** of Franz Valley
- The area is made up of small to mid-size parcels with orchards and vineyard dotting the landscape. Open pasture and rugged hillsides contribute to the **bucolic vistas, serene, quiet environment** and aesthetic qualities of the valley.
- Sonoma County has a long history of collaborating with residents on **Area Specific Plans**, dating back to at least 1979. Maintaining a pleasing environment and **visual aesthetics** of the area has been a critical component of each plan. That requirement has endured, as evidenced by its designation as a scenic corridor.



A scenic view of a rocky stream bed. The foreground is filled with smooth, dark grey and blue-grey rocks of various sizes, interspersed with patches of vibrant green moss and small ferns. In the background, more rocks and dense green foliage are visible, creating a lush, natural setting. The lighting is soft, highlighting the textures of the rocks and the vibrant colors of the vegetation.

AESTHETICS

- Franz Valley Road runs through the valley and has been designated a scenic corridor as defined in the Sonoma County General Plan 2020 Open Space and Resource and Conservation Element Map.
- It is the County's responsibility to protect these aesthetic qualities which residents enjoy.

AESTHETICS

Vistas visible by neighbors as well as visitors to Franz Valley should be consistent with our bucolic aesthetics.

The following images are not consistent and are unacceptable in Franz Valley



Unacceptable Growing & Cultivation:

- Hoop Houses
- Large numbers of plastic containers used in propagation
- Piles of composted cannabis and other waste



Unacceptable Operational Infrastructure:

- Processing facilities, drying, harvest storage areas/buildings
- Other buildings for related growing/processing/packaging supplies
- Greenhouses
- Any other temporary structures

AESTHETICS

Also inconsistent with Franz Valley aesthetic.

Unacceptable Outdoor Lighting & Artificial Lighting Methods:

- Lights used in growing operations
- Light Pollution



Unacceptable Enclosures & Access Prevention:

- Security Gates and Fencing to prevent intrusion
- Shielding of operations
- Security lighting



AESTHETICS

Cannabis Operations Light Pollution - Unacceptable



SAFETY & SECURITY



SAFETY AND SECURITY

[Hostile pot farmers forced Lava Fire retreat, CA sheriff says](https://www.sacbee.com/news/fires/article252471823)

<https://www.sacbee.com> > [news](#) > [fires](#) > [article252471823](#)

Jul 1, 2021 — Cannabis farmers near the town of Weed, CA, say firefighters let the Lava Fire burn through their greenhouses. A Hmong farmer was killed in ...

[Berkeley Police Seize Guns, Nearly 5 Pounds Of Marijuana, In ...](https://sanfrancisco.cbslocal.com/2021/01/20/berkel...)

<https://sanfrancisco.cbslocal.com> > [2021/01/20](#) > [berkel...](#)

Jan 20, 2021 — BERKELEY (CBS SF) - Three people were arrested in Berkeley on drugs and weapons charges after officers said they found loaded handguns and a ...

[California community torn apart by legal and illegal cannabis ...](https://www.desertsun.com/news/local/2019/10/18)

<https://www.desertsun.com> > [news](#) > [local](#) > [2019/10/18](#)

Oct 18, 2019 — The resulting feuds are tearing the Anza Valley apart ... Eight growers were arrested

... the unchecked growth of the industry poses serious dangers to the community, including petty theft, frequent use of guard dogs and a murder that allegedly took place the night before the June raids. He said Californians who support the cannabis industry don't understand the chaos that has swept agricultural communities like Anza.

SAFETY AND SECURITY

There are many many proximal risks associated with cannabis cultivation, whether legal or illegal (ask law enforcement up in California's famed emerald triangle). We don't know in many cases just how large or small those risks are, but what we do know is that there is MUCH LESS risk to citizens when pot is not permitted nearby.



SLO Cannabis Watch Group

COUNTY

Safeguarding our Neighborhoods

SAFETY AND SECURITY

Growers must comply with with environmental rules for human, riparian and wildlife safety and health. They must comply with fire safety, support fire fighters; comply with all statutory laws.

Crime:

- Unlike conventional agricultural activities, cannabis grow sites attract thieves.
- Franz Valley is remote location, far from law enforcement responders.
- Current suit by a grower for right to carry a weapon on his grow site.

Uncomfortable confrontations have occurred:

- Trespass
- Destruction of vines
- Threat: You don't want to get hurt

Shared rights-of-way and fire roads:

- An informal emergency exit has been blocked
- Increased vehicular traffic/dust/damage to private shared road
- Neighbor fears of confrontation

County Roads:

- Increased traffic, increased risk of accidents
- Wear and tear on public roadways

Related:

- *Community respiratory health*
- *Wildlife health*
 - Need County protection from poisons and special crop protection licenses to kill
 - Protect movement within normal range
- *Riparian health*
 - Rare and endangered aquatic life
- *Safety of firefighters*
 - Confrontations with grow workers
 - Respiratory health

FRANZ VALLEY COMMUNITY PERSPECTIVE

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We advocate that Franz Valley be an Exclusion Zone from cannabis grows.



From: [Mary Plimpton](#)
To: [Cannabis](#)
Cc: [Scott Orr](#); [Crystal Acker](#)
Subject: Franz Valley Group - Safety and Security
Date: August 23, 2021 3:37:20 PM
Attachments: [Safety and Security.docx](#)

EXTERNAL

Supplemental statements for public record.

Thank you,
Mary Plimpton

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From: [Betsy Lawer](#)
To: [Mary Plimpton](#); [Betty and Ken Parr](#); [Nancy Graalman](#); [June Lee Saler](#); [Amara Morrison](#); [Scott Orr](#); [Crystal Acker](#); [Cannabis](#)
Subject: Air Quality portion of the Franz Valley Small Group Session August 23, 2021
Date: August 23, 2021 4:52:05 PM
Attachments: [BoS Air Quality 4.1.docx](#)

Scott and Crystal, thank you for your time this morning. We look forward to future collaborative discussions.

Betsy



BETSY LAWER

PRESIDENT

907.230.8512

lawerestates.com

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Franz Valley
Sonoma County Cannabis Program Update
Small Group Session
August 23,2021

Betsy Lawer

Air Quality
Waste Management * Processing * Odor

Waste Management

Each of the 11 cannabis applications for Franz Valley states that “Cannabis waste should never exceed four cubic yards per week.” One of the challenges of considering this commercial grow operation over 30 acres, is that the applications are considered as individual ¼ acre grow operations. The cumulative effect of the entire commercial operation is not analyzed. For instance each ¼ acre grow operation might not exceed four cubic yards per week, but over the 11 permit operations, that is 44 cubic yards per week.

The compost pile generated by that waste will be stationed at the edge of the cultivation area where the garden rows begin. 44 cubic yards of materials to be compost in just a week is a huge pile, and, over time, it will grow significantly.

How will that growing compost pile be managed? If chopped, will the pile be covered, so that there will not be any particle drift from the compost. Will there be a perpetual order from the growing compost pile that will drift to neighbors?

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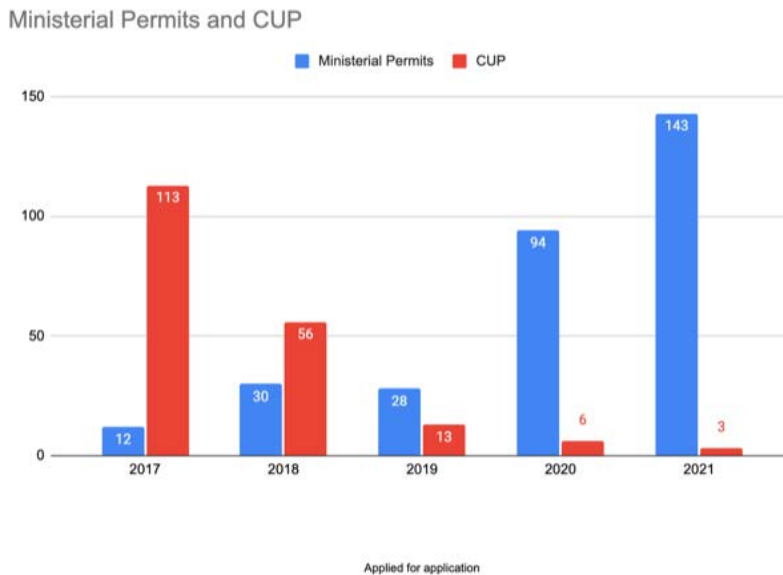
This example of the cumulative impact of 4 cubic yards of compost times 11 applications across what is really a commercial cannabis grow operation is just one example of why the county must take back control of the industry and require CUP permits for all projects that exceed 10,000 square feet on a single parcel.

The Franz Valley project is just 11 out of 143 applications in 2021.

The county amended the cannabis regulations in 2018 to allow for multiple tenants to operate on one property, and created the Dept. of Agriculture ministerial permits for grows of 10,000 square feet or less.

The cannabis industry quickly figured out how to take advantage of the ministerial permits. Only 6 CUP permits were filed in 2020 and only 3 so far in 2021. All the cannabis grows are operating with the ministerial permits.

Here is a chart from the County which shows the significant change in permitting practices used by the cannabis industry once ministerial permits were made available:



This means that there is almost no planning department review of the cannabis industry. Given the size and scope of the industry, and its plans for expansion, this is not fair to all the citizens of Sonoma County who find themselves with a neighbor growing cannabis.

I have digressed a bit from the air quality portion of plant materials waste management, but as I learned more about the challenge, it appeared to me that managing cannabis harvest waste is a significant challenge – for the cumulative impact on landfills and the environmental impact on soils as the plant waste is tilled into the soil, particularly if there is no oversight.

Processing

The Franz Valley community believes processing should only be done in an industrial zone. Please confirm that there will be no processing done on the Franz Valley site.

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Odor

Cannabis, frankly, has a stinky “skunk” smell. Who wants to live in stinky skunk smell? And, moreover, how will that skunk smell impact the almost 100 acres of vineyard production immediately adjacent to the proposed cannabis operation?

That strong, lingering stinky skunk smell will impact the quality of life for Franz Valley residents. “Community character” can be an elusive concept and impacts are difficult to quantify. In Franz Valley, I would offer that the impacts are less difficult to quantify.

While Franz Valley is divided by the Sonoma / Napa County line on Franz Valley School Road, the community works together on all issues that impact safety and quality of life. Activism and engagement have been hallmarks of Franz Valley residents for decades.

- The (approximate) population of Franz Valley: 120 ^[L]_[SEP]
- Participation in COPE (Citizens Organized to Prepare for Emergencies): Nearly 80 percent ^[L]_[SEP]
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And there have yet to be any scientific studies about the long-term health impacts of breathing cannabis stink by adults, teenagers and children.

Moreover, the strong, lingering cannabis stink in the air will impact the ability of Franz Valley residents to sell their properties at fair market value. They will likely need to take a steep market discount. Given the other alternatives, who would want to purchase a property and smell cannabis stink?

Odor impacts depend largely on concentration and proximity; larger cannabis grows produce greater odors, which can be detected at farther distances. In 2018 and early

2019, Carpinteria residents filed 166 complaints with the Santa Barbara County about intrusive cannabis odors. Residents reportedly began stuffing pillows under doors, lighting incense, and closing windows and doors even though that deprived them of cool ocean breezes in the summer. Lawsuits reportedly have been filed in Sonoma County, Colorado, Oregon, and Massachusetts by neighbors claiming cannabis-related odors have harmed their property values and caused other impacts.

My understanding is that one of the suits in Oregon has been filed under the RICO laws.

Has the Board of Supervisors quantified the potential loss of property tax revenue caused by lowered residential property values in cannabis areas and the impact of the quality of life for existing residents as a result of these stinky skunk odors?

Cannabis growers won't look for less potent plants anytime soon, in fact, if the trend continues, the demand will be for more potent, and stinky, plants. Why? Because smell might be a perceived indicator of quality. It has become apparent that the more potent marijuana varieties spark more interest and a willingness to pay higher prices.

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Franz Valley, with its unique terroir, which provides heat to develop flavors during the day and the maritime breezes for cool evenings and nights that fosters acidity, has a great reputation for producing quality premium and ultra premium wine grapes. The threat of lingering skunk stink that could taint the grapes is a real threat to businesses in Franz Valley, which now have second generations involved in the business. What winery owner, in his or her right mind, would want to take the risk of buying Franz Valley, or other, fruit grown in skunk stink to put in a bottle with their name on it?


These vineyard owners have been paying taxes to Sonoma County for years. It is astonishing that the process for considering a vertically integrated commercial cannabis

grow operation across 30 acres, smack dab in the middle of almost 100 acres of producing vineyards doesn't include the impact on these businesses.

Vineyards are the most important agricultural crop in Sonoma County. The scenic views of these vineyards, and the attendant wineries are a significant draw for tourists. Tourist dollars support B&B's, hotels, VRBOs, restaurants, etc. All of which generate significant tax revenue for Sonoma County.

In summary, the current application process of considering individual ¼ acre cannabis grows, instead considering the commercial project as a whole, for the proposed cannabis cultivation in Franz Valley does not take into consideration the cumulative impact of odors, waste management and the impact on the neighborhood – the quality of life due to odors, the property values or the impact on existing vineyards. Neither does the application process consider the environment impact – management of harvest waste. And it does not take into consideration the increased impact of concentrated, lingering odors from cultivation of cannabis in the unique box valley geography that is Franz Valley, with the daily maritime breezes holding those concentrated odors in our valley.

From: [Jon Saler](#)
To: [Crystal Acker](#)
Subject: Follow up todays Franz Valley Presentation, Jonathan Saler portion
Date: August 23, 2021 3:55:50 PM
Attachments: [Cannabis letter to Scott Orr, Crystal Aker and County Cannabis.docx](#)


Hello Crystal, Attached is the verbiage from my portion of the slide presentation from Franz Valley,
Jonathan Saler

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8/23/2021

To Scott Orr, Crystal Acker and county cannabis:

Follow up on Slide and presentation given on August 23 at 11AM with Scott Orr and Crystal Acker present:

My name is Jonathan Saler and have been a resident of Franz Valley for several decades. I have chosen to reside here because of its beauty and desirability to raise children. However, the desire to have a Cannabis grow in the valley is a hindrance to both those attributes and threatens the possibility of living here at all due to the high water usage. According to the 1979 Franz Valley Specific Plan and modified plan of 2012, Franz Valley is in a marginal water availability area, zone 3. I commend the Planning Commission for recommending NOT allowing Chapter 38 ministerial permits in zone 3 areas. However, they still felt a use permit is viable. Due to the marginal water availability and the high cannabis water usage I propose that Franz Valley be declared an Exclusion Zone for Cannabis cultivation. Cannabis is native to south-east Asia, a tropical climate with plenty of moisture. Sonoma County cannot make that claim with its six months of drought per year and low precipitation in the other six months. According to the CA Dept. of Fish and Game, the Brookings Institute and Nature Outlook, one Cannabis plant uses 6 gallons of water per day. For an outdoor grow, the Cannabis season is June to October, or 153 days meaning one Cannabis plant will use 918 gallons a season. One acre averages 4200 plants according to Canvast Supply Co. That means one acre of Cannabis per season will require 3,855,600 gallons. Our Marginal Water Available Zone 3 valley cannot afford that much water. Currently we have 11 applications for permits to grow approximately 3 acres requiring almost 12 million gallons per season. In the words of former Healdsburg Mayor Brigitte Mansell, "Don't be building something you cannot show you have water for. We don't feel confident in our water security", Now replace 'building' with 'planting' and you have the sentiments of Franz Valley Residents.

Next Slide and Next point:

All residents living in Franz Valley are on wells. Sonoma county does not supply any of our water. We get nothing from Lake Mendocino, Lake Sonoma or the Russian River The only surface water is Franz Creek which empties into the Russian River. It is reduced to a trickle and small pools during the summer. Each resident must provide their own water through wells, pumped by electricity and filtered. We cannot afford to have our aquifers depleted by proposed Cannabis growers. The 11 applications are for 3 ten-acre parcels that were formally used by a vineyard that was dry farmed, using no water. The proposed 3 acre grow plans to use three wells with holding tanks to supply their needs. This is a huge drain on our "marginal Availability zone 3" aquifers.


Next slide and Next point:

The only surface water in Franz Valley is Franz Creek and its few small tributaries. One of the small streams that feeds Franz Creek is Bidwell Creek which comes from the area of the proposed 11 applicant grow. The chemicals and water usage will adversely affect Franz Creek and the aquatic life that reside there, which includes the federally endangered California Freshwater Shrimp and the federally endangered Steelhead fingerlings.

Next Slide and Final point:

Because water is needed to put out fires, I mention fire suppression along with water usage. The 1979 Franz Valley Study rates Franz Valley as 80% extreme fire hazard based on weather, slope and fuel load. This conclusion was certainly influenced by the Hanly fire of 1964. Since then, the 1979 report on Franz Valley rating has been downgraded. However, the 2017 Tubbs fire which followed the same footprint as the Hanly fire proves from its destruction, that Franz Valley is still an extreme fire hazard area and will need all the water it can get. Therefore, I conclude with the proposal to make Franz Valley an Exclusion Zone for Cannabis cultivation.

From: kbparr@sonic.net
To: [Cannabis](#); [Crystal Acker](#); [Scott Orr](#)
Subject: Additional comments
Date: August 23, 2021 3:26:28 PM
Attachments: [Franz Valley Small Group Session Talking Points - Aesthetics.pdf](#)


Crystal and Scott,

Attached, please find my talking points from the Franz Valley Small Group meeting earlier today. Thank you again for your time.

Kind regards,

Michele Parr

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Franz Valley Small Group Session
Sonoma County Cannabis Program Update
August 23, 2021
11:00 am

Aesthetics

Aesthetics are one of the environmental impact topics which make up CEQA. The topic, as it relates to cannabis cultivation must be studied and the findings included in the EIR.

Franz Valley is a bucolic setting, with scenic vistas and rural character. The Franz Valley Area plan was adopted in 1979 and modified in 2012 to reinforce conservation, wildlife habitat and agricultural management, among other things. Sonoma County sought neighborhood input in an effort to draft and implement the Plan.

Franz Valley Road has been designated a scenic corridor as seen in the map, here. (slide 26).

The area, as enjoyed by neighbors, as well as visitors, should be free of the visual aspects related to a cannabis operation.

The slides included here illustrate the visual impact cannabis operations could make and what we find unacceptable. Here are some examples:

- Hoop houses
- Volumes of plastic containers
- Cannabis compost waste
- Processing facilities and related buildings
- Large security gates, fences and structures, creating a fortress-like appearance
- Outdoor lighting used for grow operations and security that illuminate the night time sky and invade neighbors' homes after dark

Cannabis cultivation would negatively impact the scenic setting and peaceful rural character of the area.

Therefore, cannabis cultivation is unacceptable in Franz Valley and Franz Valley should be an Exclusion Zone.

Michele Parr
Parr Vineyards
5th Generation, Franz Valley

From: [Mary Plimpton](#)
To: [Cannabis](#)
Cc: [Scott Orr](#); [Crystal Acker](#)
Subject: Franz Valley Group - Safety and Security
Date: August 23, 2021 3:37:20 PM
Attachments: [Safety and Security.docx](#)

EXTERNAL

Supplemental statements for public record.

Thank you,
Mary Plimpton

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FRANZ VALLEY

Safety and Security issues and concerns

August 23, 2021

A sign reading “You are entering a High Risk Zone” is located at the western entrance to Franz Valley Road, where it intersects with Mark West Springs and Porter Creek Roads at Safari West. It was posted in late 2016/early 2017 after the Tubbs Fire, and it serves to underscore our contention that Franz Valley is an example of a place in which cultivation of cannabis should be excluded, or to rephrase it: We believe Franz Valley should be an Exclusion Zone for cannabis.

It is our position that because the region is in Extreme Drought which may foretell a Mega Drought that could last many years – meaning that current conditions are our New Normal – a MORATORIUM should be placed on the permitting of any and all activities that increase regional water usage.

In view of this drought, cannabis seems a questionable idea at best for the County. **Drought puts every human, animal, plant and business at mortal risk.**

The County is mandated to add a huge number of affordable housing units, an important, necessary, and laudable program. There is no argument that new housing units require an increase in water hook-ups. How will County-wide water usage allocations be determined? Cannabis is surely far far down the list of County water usage priorities compared to drinking water, water for cooking and hygiene, water for food crops and animals....

Wouldn't wise and truly visionary leadership focus first on water? How did cannabis get to the front of the line?

If/when the County determines to proceed with a cannabis strategy:

We have grave concerns about the impact of cannabis on several elements of safety and security in Sonoma County – and, selfishly, specifically in our Franz Valley community.

Cannabis growers – throughout the County – must comply with all rules, regulations and requirements affecting the health and safety of human, animal, and riparian life.

Since cannabis is high oil content, it increases the fire risk anywhere it is grown. Growers must comply with fire safety regulations, support fire fighters and in general comply with all laws, ordinances, rules and regulations.

We are assured that legal grows will reduce crime, but experiences within our own County and news stories from other growing locations suggest the opposite.

- Unlike conventional agricultural activities, cannabis grow sites attract thieves.

- We understand there is a current lawsuit by a legal grower against Sonoma County. The plaintiff demands the right to carry a weapon on his legal grow site because he has experienced frequent break-ins and product losses. He states there he has had inadequate law enforcement responses. This undermines confidence in the argument that legalizing cannabis reduces crime.
- FV is remote from all emergency responders, and, as elsewhere noted in our presentation, so-called responsibility for FV is divided among various jurisdictions in 2 counties. That fact alone results in delayed response times far beyond normal drive times.

Are we unreasonable to ask that the County reach out to other California counties that have legalized cultivation of cannabis. Can we not learn from their experiences, including their mis-steps. (Santa Barbara County is a cautionary example.)

Are we unreasonable to insist that the County budget for and staff up to monitor and enforce compliance with all cannabis-related ordinances, rules, and regulations.

As things stand today, based on our own short recent experience as well as reports from elsewhere in Sonoma County, it falls to lay citizen neighbors to report violations and non-compliances, attesting to the current insufficiency of County monitoring and enforcement.

Related safety and security concerns:

Franz Valley has just 2 paved roads; all other roads are private, 95+% of which are dirt roads.

For years, for decades, our county roads have not been regularly or well-maintained. We lurched from pothole to pothole, and it was a relief to cross the county line and onto Napa County's better-maintained section of the road leading to our closest town, Calistoga.

In the aftermath of the Tubbs Fire, the poor condition of our roads deteriorated further due to temporarily increased traffic of heavy equipment hauling out fire debris, followed by a huge number of big rigs bringing in construction materials. Franz Valley Road and Franz Valley School Road became more like plowed tracks, hard on the tires, axles and frames of private cars and pickup trucks.

A shout out to your colleague in DTPW: Johannes Hoevertsz found the money to repave both County roads. We are very grateful. (And we are the ENVY of our Napa County neighbors.)

We are worried about the prospect of cannabis grow-site related increases in traffic. The pictures in the slide deck illustrate our already dangerously narrow winding roads, in far too many places too narrow for 2 cars to pass without one going off the roadway.

- Increase in traffic will increase risk of accidents
- We worry about increased wear and tear on our beautiful newly repaved road surfaces

We also are worried about impact of cannabis-related traffic on our shared private right-of-way and farm roads:

- Increased vehicular traffic increases dust and will accelerate the inescapable wear and tear on these shared private dirt roads
- Loss of emergency exit: Recently one part of a network of shared farm roads, considered for decades as an emergency fire exit, has been blocked at the fence line with the proposed cannabis grow site
- Neighbor fears of confrontation with the cannabis workers

Uncomfortable interactions have already occurred

- Trespass (A stranger appeared from the vicinity of the proposed grow site, asking a young wife (mother of an infant and toddler) to drive him to town. He didn't demand or threaten, but it frightened her.)
- Destruction of grape vines (most likely a simple misunderstanding of property lines, but...)
- Hostile verbal interactions: "You don't want to get hurt" – which felt like a threat to the person so "cautioned."

Other Safety and Security concerns:

We are concerned about and ask that the EIR incorporate County-wide standards, regulations – and that the County provide enforcement – to protect

- Community respiratory health – including cannabis worker health
- We worry about the safety of firefighters
 - Hostile firefighter confrontations with cannabis grow workers – as reportedly already occurred elsewhere (the Lava Fire)
 - Firefighter respiratory health
- Health of wildlife/animal life
 - Request County protection of wildlife, all animal life, from poisons (necropsies of animal corpses found near cannabis grow sites confirm use of poisons).
 - A poisoned rabbit leads to a poisoned dog, coyote or other critter
 - We further ask that you deny so called "crop protection" licenses to kill foraging wildlife
 - We raise concerns about aggressive fencing around cannabis grows
 - Protect wildlife movement within their normal range
 - Franz Valley is a wildlife corridor into our neighbor the Pepperwood Preserve which lies on our western ridge.
- Riparian health
 - Stream flows and all riparian life – including rare and endangered species (fresh-water shrimp and steelhead trout/fingerlings)

In summary and to repeat: Franz Valley is the Poster Child of where NOT to plant cannabis.

WE REQUEST and ASSERT THAT FRANZ VALLEY SHOULD BE AN EXCLUSION ZONE FOR CANNABIS

Thank you for your consideration.

Mary Plimpton
Franz Valley, 6th generation
Owner
8425 Franz Valley School Road
Calistoga 94515

From: [Mary Plimpton](#)
To: [Cannabis](#)
Cc: [Scott Orr](#); [Crystal Acker](#)
Subject: Franz Valley - Supplemental info
Date: August 23, 2021 4:59:23 PM

This has just come to our attention - and may be of value as you consider the cannabis strategy:

Researchers analysed the impact of large-scale cannabis growing in northern California, finding soils and ecosystems in the region to be seriously damaged by extensive cultivation. Cannabis farming requires a generous amount of water, which can contribute to droughts, while its waste water pouring into soil and rivers is often polluted with some sort of residual chemicals. Moreover, the volatile compounds that produce cannabis' aroma can dangerously increase ozone levels surrounding a big plantation.

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From: [Nancy Graalman](#)
To: [Scott Orr](#); [Crystal Acker](#); [Cannabis](#)
Subject: Franz Valley Small Group "narrative"
Date: August 23, 2021 4:38:58 PM
Attachments: [Franz Valley Small Group presentation Aug 23 2021_.pdf](#)

Good afternoon ~~~

Please find the attached document that formed the narrative for my part of the "Franz Valley Small Group" PowerPoint presentation.

Please do not hesitate to contact me if you have questions or need further clarification.

Regards,
Nancy Graalman
415. 515. 1616

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“Franz Valley Small Group: August 23, 2021)

Wildfire in Franz Valley

I am Nancy Graalman. I have owned property in Franz Valley since 1987, and have been a full-time resident since 2013.

=====

(Starting with the photo array on Page 11)

These images mark the moments and aftermath of the Tubbs fire as Franz Valley burned and residents -- without warning other than neighbor-to-neighbor -- fled through three treacherous exit routes. One of the exits -- north to Highway 128 -- was blocked until our local fire chief cut open a gate through a vineyard off of Spencer Lane to provide an escape.

The photo of the inferno shows the fire as it roared from the northeast through Franz Valley School Road and over the site now proposed for the vertically integrated commercial cannabis grow operation. In 2017 that site was a dry-farmed vineyard that survived the fire.

The incinerated home was the multi-generational family home on the property adjacent to and just below the proposed commercial cannabis grow operation. **Remember the sight of this destruction for later discussion.

=====

October 2017 further galvanized an already tight-knit Franz Valley community. Highlighting our years of activism, we contracted in 2020 with the highly respected Wildland Resource Management company and its fire ecologists to research our historical and ongoing fire risks and to advise on ways to curb those risks.

Those findings -- with some further actions to come -- were presented this past spring at a community gathering attended by nearly 80 Knights Valley and Franz Valley residents. The discussion reinforced our alarms that coordinated, vertically integrated commercial cannabis grow operations would amplify the high risks Franz Valley already faces:

- Water shortages and watershed impacts,
- Fire and emergency response challenges,
- Ecological and soil degradation.

=====

Items from the CWPP Document:

- (1) Franz Valley is a small boxed-in valley
- (2) Northeast wind conditions put us directly in the path of accelerated winds from Knights Valley
{Nancy note: The first home to burn in Franz Valley on Franz Valley School Road -- just east of the Sonoma/Napa County line -- came within 20 minutes after the fire's first ignition near Hwy 128.}
- (3) Our boxed-in valley brings exacerbated risks from the Diablo winds.
- (4) This boxed-in feature also brings episodes of still, stagnant air during summer months due to stationary fronts.
- (5) High temperatures and low relative humidity enhance potential of ignition and extreme fire behavior.

=====

The cannabis plant itself and planting practices contradict the known benefits of vineyards in fire-prone areas owing to the vine itself and planting methods that include distance between vines, and mowed and bare soil surfaces.

In an October 29, 2019, *San Francisco Chronicle* article, S. Kaan Kurtural, UC Davis professor of viticulture and oenology, explained the phenomenon noted throughout wine-growing regions here and abroad: "Vines are green and full of water. With the amount of water they can hold in their tissue, they become an oasis in a hot environment."

Cal Fire Chief Scott McLean said: "We take everything into account when fighting these wildfires. Natural boundaries, natural borders, natural defenses. A vineyard is one less thing that burns."

In contrast, closely bunched cannabis grow practices and flammable cannabis plants reverse this advantage.

***Reflecting back to the images of the approaching fire and its destruction:*

The incinerated home shown in the array was on the vineyard property adjacent to – and mere yards from -- the site now being proposed for the commercial cannabis grow operation. To try to save his family home and other structures, the decades-long Franz Valley resident fought the flames until he was forced to retreat to the middle of his vineyard where he found life-saving refuge while the fire burned around him.

Multiple Franz Valley vineyards survived the Tubbs fire, including the dry-farmed vineyard that existed (I believe it has now been pulled out by the permit applicant) on the site of the currently proposed commercial cannabis operation on Franz Valley School Road.

(Editorial note: Would anyone be willing to seek refuge from a raging fire in the middle of a cannabis field.)

=====

The Tubbs Fire made manifest the risks Franz Valley residents face in crisis situations, including slow emergency response; congested and potentially blocked roads; communications dead zones (the alarms raised as the Tubbs fire progressed came extensively through neighbors' knocking on doors, which most likely saved many lives); and the confusion of multiple jurisdictions.

Since 2017 residents have invested an extraordinary amount of time and money in fire prevention through funding of the CWPP; commitment to the mission of our Northern Sonoma County Fire Protection District and its "fuel management" campaign and projects; Franz Valley and Sonoma County-wide COPE involvement; establishing a Franz Valley-centered emergency group messaging system; and advancing petitions to local and regional government agencies to bring us a functioning communications infrastructure.

A commercial cannabis grow operation in Franz Valley eradicates these efforts for an excess of reasons, thus elevating questionable impacts and expected entitlements of the few over the merited needs of many.

Regardless of any "alternative" or "promised mitigations" that emerge from the CEQA / EIR process, Franz Valley meets the criteria to earn the irreversible "Exclusion Zone" designation.

#