Attachment 29. Public Comments
Comments received 3/24/2021 through 4/6/2021

From: ANGELA CORDOVA
To: Crystal Acker
Subject: Glenn Ellen Cannabis Dispensary
Date: March 24, 2021 11:45:09 AM

EXTERNAL

Hello Ms. Acker,

I am sending my email in support of the proposed Cannabis Dispensary.
This business is no different than local wine tasting or bars. I have visited this site and do not see any concern with traffic congestion. As for security, I believe the State of California regulates the industry and requires a level of security that will provide comfort to the community.
I would like to see the tax revenue prosper for our area.
Please proceed with the applicants request to open this dispensary.

Thank you,

Angela Cordova

BRENDA BUCKERFIELD & THOMAS MENSING
1000 Morningside Mountain Road
Glen Ellen CA 95442
415-819-4740 / 612-860-4888

March 23, 2021

Crystal Acker, M.S. ***Letter sent via email – Crystal.Acker@sonoma-county.org***
Planner III
County of Sonoma
PRMD - Planning Division | Project Review
2550 Ventura Avenue, Santa Rosa, CA 95403

Re: Loe Firehouse 3,847 square foot Cannabis Dispensary, 15499 Arnold Drive, Glen Ellen
Sonoma File No. UPC17-0094

Dear Ms. Acker,

As parents and grandparents, my husband & I are very concerned about the serious effect to our children and grandchildren of having a Cannibis dispensary right across the street (on Arnold Drive) from our property on Morningside Mountain Drive) in Glen Ellen. Our grandchildren climb trees and play on our property all the time! They also walk across the 4 way stop to get doughnuts from the Mexican market next to the proposed site. Our grandchildren (13) of them range in age from 10-16. All vulnerable ages and curious. Especially if a distributing Cannabis store were to be located in this family neighborhood. We are not the only ones on Morningside Mountain Road who have visiting children & grand children who all love to hike & bike over to Madrone Road where the proposed Cannabis site is to be located.

In addition there are hundreds of families living in the low income apartments next door and across Madrone. Every time I drive by there it is a delight to see all the children of these families running and playing in their yards. It is just totally unacceptable that anyone would consider a cannabis dispensary in our wonderful diversified family neighborhoods.

Therefore, we would appreciate a negative decision to allow this “out of place” and “inappropriate business” to be located in our little family Community.

We would also like to state the following:

First, the Negative Declaration is highly flawed in its consideration of traffic and parking at this facility, given the applicants projected rates of trips and visits (see page 2 of the January 4, 2021 W-Trans Traffic Study) and prejudicial in its failure to consider the astounding projected increase over current usage.

- Daily Trips for this proposed facility increase from 38 trips to 301, **a 792% increase**.
- Peak Hour Weekday AM Trips increase from 4 to 21, **a 525% increase.**
- Peak Hour Weekday PM Trips increase from 6 to 42, **a 700% increase**.
- Peak Hour Weekend PM Trips increase from 2 to 70, **an unheard of 3500% increase**.

The traffic impacts from only 12 guest parking spaces will also be astounding and permanently detrimental to this residential neighborhood. There is no calculation made of the average time spent in the store by a customer evaluating possible purchases and completing necessary requirements for a transaction. Assuming an average of 30 minutes, this means that on a weekday there will be at least 12 cars per hour trying to find

spaces on Madrone Road or Marty Way, since no near parking on Arnold Drive is available. This increases to at least 44 cars per hour at peak times on weekend trying to park in a very small residential area, where street parking is already occupied by local residents. It is incomprehensible that this impact has not been considered, or that it is considered to meet the May 2016 Traffic Operation Standard that "parking demand is accommodated." Further, see below – the proposed Project does not provide the required parking per the Sonoma County Municipal Code.

Second, the Application is in direct violation of the Sonoma County Municipal Code on two counts:

1. **100 FOOT RESIDENTIAL SETBACK.** A cannabis dispensary must be at least 100 feet from a residentially zoned property unless a "physical separation" exists between land uses or parcels such that no offsite impacts could occur. **Five residential properties are within 100 feet of the proposed dispensary.** No physical separation of any kind exists between these five residential parcels and the proposed cannabis dispensary. PRMD initially stated to the community that "a public street" represents physical separation. A "public street" is actually the direct opposite of "physical separation" – it is "public access". When it was pointed out to PRMD that the 121-unit apartment project is 57 feet from the dispensary location – **and not separated by a "public street"** - PRMD then opined in June 2018 that the market/burrito store in between the two properties represented "physical separation" even though you can walk directly on Madrone Road from one property to the other. These arguments make no sense and clearly do not meet the intent of the Sonoma County Code of Ordinances. Fortunately, in the 2018 approved Cannabis Cultivation Ordinance Resolution 18-003, the County has now defined physical separation as follows in Sections 26-88-254 f (6) and f (8): *"Physical equivalent separation exists due to topography, vegetation or slope."* That is now the County standard for the term "physical separation". There is no topography, vegetation or slope between the proposed cannabis dispensary and the five residential properties. **The "Environmental Pollution Solutions December 21, 2019" memorandum is highly flawed and under their assumptions, every property in Sonoma County would qualify as allowable for a cannabis dispensary within 100 feet of a residential property.**

2. **INSUFFICIENT PARKING**. The Applicant has proposed 17 spaces on their site plan but one space does not meet County Code. PRMD has confirmed that that the cannabis dispensary is legally only providing 16 parking spaces. **The applicant has calculated the parking code incorrectly and is attempting to only calculate parking on the front retail portion of the facility.** The applicant has arbitrarily not allocated any parking requirements to the remaining 1,956 square feet of their space – which is not how the code calculates parking. This dispensary application is for 3,847 square feet. The parking calculation is 100% clear per Sonoma County Code 26-88-010 which states: "*Required Parking. All uses permitted in Chapter 26 of the Sonoma County Code shall provide parking according to the following formulas:…"* For a Medical Cannabis Dispensary, the required parking is *"2 spaces, including at least 1 van-accessible space; plus 1 additional space for every 200 square feet of **gross floor area**, plus 1 additional space for each employee on maximum shift; but in no case less than 5 off-street parking spaces".* **It clearly says parking must be calculated on the "gross floor area"**. There is no carveout for any non-retail space within a medical cannabis dispensary business. **Therefore, this use requires 2 + 20 + 5 = 27 spaces.** That is equivalent to a 7.02 space per 1000 square foot ratio. The property can only accommodate 16 spaces – **therefore it is 69% under parked.** The application also does not meet the minimum employee parking requirement of 5 spaces (they are only providing 4 spaces).

There are other troubling issues such as adjacency to a bus stop across the street used by numerous families and children, and an inevitable increase in crime issues.

These major environmental and code violation issues should have PRMD terminating this application immediately. This letter is not written in opposition to cannabis dispensaries which are allowed by the Sonoma County Municipal Code. This letter is IN OPPOSITION to allowing a cannabis dispensary in a 99.9% zoned residential neighborhood with many families and hundreds of children and which is in violation of the Sonoma County Municipal Code.

Sincerely,

Brenda Buckerfield & Thomas Mensing
1000 Morningside Mountain Road
Glen Ellen CA 95442

From:	Ricardo Capretta
To:	Crystal Acker
Cc:	Paul Morrison (pmorrison@marinwater.org)
Subject:	RE: UPC17-0094; 15499 Arnold Dr; Loe Firehouse Dispensary; Public Notice
Date:	March 24, 2021 5:12:52 PM
Attachments:	image006.png image007.png image010.png image011.png image016.png

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EXTERNAL

Crystal

We have been through this discussion before on f (4). It is absolutely unbelievable that PRMD feels the applicant has established physical separation. The cannabis shop is 57 feet away from a 122-unit apartment project and the access is a walk along Madrone Road. There is absolutely no physical separation between the cannabis shop and the apartment complex, or for that matter the other 4 residential properties including mine. Public streets also do not provide physical separation. Physical streets are actually the opposite of physical separation because they are public spaces. Second, and very fortunately, in the 2018 the County has now defined physical separation as follows in Sections 26-88-254 f (6) and f (8): *"Physical equivalent separation exists due to topography, vegetation or slope."* That is now the County standard for the term "physical separation" and it's a proper definition for what should be accomplished in the Code.

Secondly, you have never addressed the fact that this project is 69% under parked. I – and other neighbors - have made you aware of this numerous times. The code is very clear. You calculate parking on gross floor area – not only on net retail area as the applicant has done. The County or the applicant can't arbitrarily calculate a different parking number without the applicant legally asking for a variance.

Third, the traffic impacts are massive for such a small use. This does not meet the intent of a Negative Mitigated Declaration in my opinion.

We will see how these hearings go. Hopefully our government officials opine properly and legally per the Sonoma County code. As you have seen from the massive neighborhood opposition from hundreds of residential owners, this will get appealed as far as it has to go so it is not approved. This use does not legally belong in our neighborhood. Our neighborhood does not deserve a massive increase in traffic from such a use. Most importantly, it would decrease our property values.

Every applicant has the legal right to process an application for a use permit. PRMD should be denying this application based on the violation of the 100-foot setback and the violation of the parking requirements. This makes no sense what PRMD is doing – you are supposed to be protecting property owner rights when evaluating applications. I have been holding off on reaching out to Tennis but I am now going to do that to discuss this matter further. Eventually I will also reach out to Supervisor Gorin if this gets to BOS. I unfortunately have no choice now and must protect my

property rights. Once again for the record, I have no opposition to cannabis facilities that meet all Sonoma County codes.

CAPRETTA properties

Ricardo Capretta

415-489-1703 (Office - Sonoma)
415-383-8242 (Office – Mill Valley)
415-203-7700 (Mobile)

From: Crystal Acker <Crystal.Acker@sonoma-county.org>
Sent: Wednesday, March 24, 2021 8:47 AM
To: Ricardo Capretta <rcapretta@capretta.com>
Subject: RE: UPC17-0094; 15499 Arnold Dr; Loe Firehouse Dispensary; Public Notice

Hi Ricardo.

The Negative Declaration is the environmental review document required for projects subject to CEQA (California Environmental Quality Act). It's purpose is for disclosure only.

Staff are recommending approval of the Use Permit because it meets the requirements of the code to request a waiver of the residential zoning district setback under Code Section 26-88-256(f)(4). The ultimate decision to waive the setback and either approve or deny the Use Permit is up to the review authority, in this case the Board of Zoning Adjustments. They won't make that determination until after they have heard all public comment at the hearing.

Sec. 26-88-256. - Cannabis dispensary uses.

f. Location Requirements. Property setbacks for cannabis dispensaries shall be measured in a straight line from the property line of the protected site to the closest property line of the parcel with the cannabis dispensary.
    1. A cannabis dispensary shall not be established on any parcel containing a dwelling unit used as a residence, nor within one hundred feet (100') of a residential zoning district.
    2. A cannabis dispensary shall not be established within one thousand feet (1,000') of any other cannabis dispensary or a public park, nor within five hundred feet (500') from a smoke shop or similar facility.
    3. A cannabis dispensary shall not be established within one thousand feet (1,000') from a school providing education to K-12 grades, childcare center, or drug or alcohol treatment facility.
    4. Notwithstanding, the subsections (f)(1) and (2) may be waived by the review authority when the applicant can show that an actual physical separation exists between land

uses or parcels such that no off-site impacts could occur.

5. A cannabis dispensary proposed within the sphere of influence of a city will be referred to the appropriate city for consultation.

Due to Public Health Orders, Permit Sonoma will be temporarily closing to the public effective Monday, July 20 until further notice. We continue to provide services remotely minimizing person-to-person contact which helps protect our community. We look forward to serving you and will reply to your message within the next three business days. We encourage you to use our online services for permitting, records, scheduling inspections, and general questions. You can find out more about our extensive online services at permitsonoma.com

Thank you for your patience and understanding as we work together to keep our communities safe.

Crystal Acker, M.S.
Planner III
www.PermitSonoma.org
County of Sonoma
Planning Division | Project Review
2550 Ventura Avenue, Santa Rosa, CA 95403
Direct: 707-565-8357 |
Office: 707-565-1900 | Fax: 707-565-1103

***OFFICE HOURS**: Permit Sonoma's public lobby is open Monday through Friday from 8:00 AM to 4:00 PM, except Wednesdays, open from 10:30 AM to 4:00 PM.*

From: Ricardo Capretta <rcapretta@capretta.com>
Sent: March 22, 2021 10:02 AM
To: Crystal Acker <Crystal.Acker@sonoma-county.org>
Subject: RE: UPC17-0094; 15499 Arnold Dr; Loe Firehouse Dispensary; Public Notice

EXTERNAL

Crystal

I have a question. Has PRMD taken a position recommending approval or denial of the this Negative Declaration? Thanks

Ricardo Capretta

415-489-1703 (Office - Sonoma)
415-383-8242 (Office – Mill Valley)
415-203-7700 (Mobile)

From: Crystal Acker <Crystal.Acker@sonoma-county.org>
Sent: Friday, February 26, 2021 4:12 PM
To: Crystal Acker <Crystal.Acker@sonoma-county.org>
Subject: UPC17-0094; 15499 Arnold Dr; Loe Firehouse Dispensary; Public Notice

Hello,

You are receiving this email because you have requested notification on the subject project as an interested party.

Please see attached legal notice.

The draft Initial Study/Negative Declaration is available for review here:

https://share.sonoma-county.org/link/N6akMIfRJd0/

Due to Public Health Orders, Permit Sonoma will be temporarily closing to the public effective Monday, July 20 until further notice. We continue to provide services remotely minimizing person-to-person contact which helps protect our community. We look forward to serving you and will reply to your message within the next three business days. We encourage you to use our online services for permitting, records, scheduling inspections, and general questions. You can find out more about our extensive online services at permitsonoma.com

Thank you for your patience and understanding as we work together to keep our communities safe.

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Ms. Crystal Acker, M.S. March 24, 2021
Planner III
County of Sonoma
PRMD – Planning Division / Project Review
2550 Ventura Avenue
Santa Rosa, CA 9543

RE: Loe Firehouse 3,847 square foot Cannabis Dispensary, 15499 Arnold Drive, Glen Ellen
Sonoma File No. UPC17-0094, Comments on Draft Negative Declaration

Dear Ms. Acker,

The Board of Zoning Adjustment should DISAPPROVE the Negative Declaration of the above project for the following reasons:

- **Zoning Intent**. A cannabis dispensary is a potential destination site that sells an over-21 product. We have no commercial activity in the neighborhoods adjacent to the proposed site, except for two small community markets. (The art gallery referenced in Negative Declaration has had no discernable commercial traffic for many years.) Community residents drive to Sonoma or toward Glen Ellen / Kenwood / Santa Rosa for their goods and services. This dispensary would not become part of, or derive benefit from, other commercial activity, nor would it share or mitigate any portion of "vehicle trips" or related environmental impacts that are arguably shared in commercially zoned locations. It is an ill-considered fit for this residential crossroads.

- **Opening Hours**. There is no rationale for the increased opening hours of 7 am to 7 pm, Monday through Saturday. This will only add increased traffic and community burden during peak commute times. Furthermore, the increased hours interfere with children and residents using the corner for transit and school bus loading/unloading. This conflict is a significant public hazard.

- **Residential Setback**. Several residential properties are within 100 feet of this property, so the 100-foot setback requirements have not been met. This should be identified as a significant impact in the land use section of the Negative Declaration, under consistency with land use regulations analysis. Also, the site may be within 1000 feet of the nearby public park.

- **Traffic & Safety**. The traffic study addendum in January 2021 reflected changes to vehicle miles traveled (VMT) and new opening hours. Daily trips increased from 38 to 301, an ***increase of 263 trips***. It's not clear whether this accounted for changes to traffic patterns from Covid 19, and if or how the pending development of the Sonoma Developmental Center (SDC) was assessed. This will certainly compound environmental and other impacts and should be considered. The cumulative impact analysis in the Negative Declaration fails to evaluate the future redevelopment of SDC, which will add thousands of daily vehicle trips to the area.

The intersection analysis in the traffic report was for Madrone Road at Arnold Drive only; it did not take into account the Madrone Road/Glenwood Drive intersection. Approximately 50 yards separate the two and both are along a well-trafficked route between Sonoma and Santa Rosa. Northbound traffic stops briefly (if at all) at the Arnold/Madrone corner, then turns right onto Madrone, leaving those turning left (west) from Glenwood onto Madrone precious little breathing room to safely make that turn.

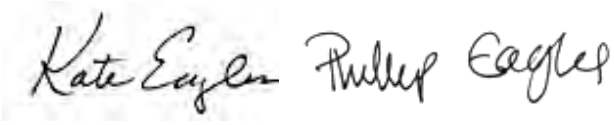
As noted in the 2018 traffic study, "Because the collision rate for Arnold Drive/Madrone Road was slightly higher than the statewide average, the crashes at this location were reviewed in greater detail. All six of the collisions involved northbound vehicles only, with rear-end and side-swipe crashes being the predominant types and unsafe speed or improper turning being the most common primary collision factors."

The Madrone/Glenwood intersection is one of only two access points into the Rancho Madrone neighborhood south of Madrone Road. During busy times of day, exiting the neighborhood safely can be challenging. This is exacerbated when cars are parked tightly on Madrone Road, limiting visibility (see "Parking" below). Both Madrone/Arnold and Madrone/Glenwood intersections are directly adjacent to the proposed dispensary site and will be impacted by the additional trips cited in the traffic impact study and addendum. The increase in traffic at or near these intersections will create a hazardous condition for residents in this area. This impact has not been adequately evaluated in the Negative Declaration.

- **Parking**. It appears that the parking space calculation utilized by the applicant does not meet the square footage requirement. It is my understanding the full square footage must be used, or 3,847 square feet, which would indicate a total of 27 parking spaces versus the 16 to be provided. If the parking assessment for the dispensary is inadequate, it is on residential Madrone and Glenwood Roads where customers will park. These roads already serve as necessarily overflow parking for Rancho Madrone and The Grove apartments. There is no other commercial parking on Arnold Drive or Madrone Road. (There are no crosswalks on any of the roads or intersections adjacent to the proposed site.) While parking itself is not a CEQA issue, the hazards created by unsafe and inappropriate parking are impacts under CEQA.

This proposed dispensary does not meet the necessary environmental and code standards required and would be poorly situated in this residential neighborhood for the reasons cited. We are strongly opposed to its siting at this location.

Sincerely,



Kate and Phil Eagles
983 Glenwood Drive
Sonoma, CA 95476

From: Frank Turner
To: Crystal Acker
Subject: Cannabis Dispensary Project
Date: March 24, 2021 1:00:26 PM

My name is Frank Turner. I have been a Sonoma County resident for 63 years.

I am in agreement with the proposed project. I do not foresee Traffic and parking being a problem

This is the perfect neighborhood for this project. Perfect location in an underserved area.

I have researched and found that crime at licensed dispensaries are low compared to the alternative illegal black market. Which results in illegal activities such as robberies.

Vocal local neighbors should not be allowed to hold back this project that the vast majority of the county wants. They are not the only ones who reside in the area. Like they say, do not let one rotten apple ruin the tree. In this case, do not let the opposing neighbors ruin this opportunity for the town to grow

With all due respect,

Frank Turner

"Live and let live"

March 25, 2021

Crystal Acker, M.S. ***Letter sent via email – Crystal.Acker@sonoma-county.org***
Planner III
County of Sonoma
PRMD - Planning Division | Project Review
2550 Ventura Avenue, Santa Rosa, CA 95403

Re: Loe Firehouse 3,847 square foot Cannabis Dispensary, 15499 Arnold Drive, Glen Ellen

Dear Ms. Acker,

The scheduled Board of Zoning Adjustment hearing on April 8, 2021 should DISAPPROVE a Negative Declaration for CEQA approval of the above project for two major reasons:

First, the Negative Declaration is highly flawed in its consideration of traffic and parking at this facility, given the applicants projected rates of trips and visits (see page 2 of the January 4, 2021 W-Trans Traffic Study) and prejudicial in its failure to consider the astounding projected increase over current usage.

- Daily Trips for this proposed facility increase from 38 trips to 301, **a 792% increase**.
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- Peak Hour Weekday PM Trips increase from 6 to 42, **a 700% increase**.
- Peak Hour Weekend PM Trips increase from 2 to 70, **an unheard of 3500% increase**.

The traffic impacts from only 12 guest parking spaces will also be astounding and permanently detrimental to this residential neighborhood. There is no calculation made of the average time spent in the store by a customer evaluating possible purchases and completing necessary requirements for a transaction. Assuming an average of 30 minutes, this means that on a weekday there will be at least 12 cars per hour trying to find spaces on Madrone Road or Marty Way, since no near parking on Arnold Drive is available. This increases to at least 44 cars per hour at peak times on weekend trying to park in a very small residential area, where street parking is already occupied by local residents. It is incomprehensible that this impact has not been considered, or that it is considered to meet the May 2016 Traffic Operation Standard that "parking demand is accommodated." Further, see below – the proposed Project does not provide the required parking per the Sonoma County Municipal Code.

Second, the Application is in direct violation of the Sonoma County Municipal Code on two counts:

1. **100 FOOT RESIDENTIAL SETBACK.** A cannabis dispensary must be at least 100 feet from a residentially zoned property unless a "physical separation" exists between land uses or parcels such that no offsite impacts could occur. **Five residential properties are within 100 feet of the proposed dispensary.** No physical separation of any kind exists between these five residential parcels and the proposed cannabis dispensary. PRMD initially stated to the community that "a public street" represents physical separation. A "public street" is actually the direct opposite of "physical separation" – it is "public access". When it was pointed out to PRMD that the 121-unit apartment project is 57 feet from the dispensary location – **and not separated by a "public street"** - PRMD then opined in June 2018 that the market/burrito store

in between the two properties represented "physical separation" even though you can walk directly on Madrone Road from one property to the other. These arguments make no sense and clearly do not meet the intent of the Sonoma County Code of Ordinances. Fortunately, in the 2018 approved Cannabis Cultivation Ordinance Resolution 18-003, the County has now defined physical separation as follows in Sections 26-88-254 f (6) and f (8): *"Physical equivalent separation exists due to topography, vegetation or slope."* That is now the County standard for the term "physical separation". There is no topography, vegetation or slope between the proposed cannabis dispensary and the five residential properties. **The "Environmental Pollution Solutions December 21, 2019" memorandum is highly flawed and under their assumptions, every property in Sonoma County would qualify as allowable for a cannabis dispensary within 100 feet of a residential property.**

2. **INSUFFICIENT PARKING**. The Applicant has proposed 17 spaces on their site plan but one space does not meet County Code. PRMD has confirmed that that the cannabis dispensary is legally only providing 16 parking spaces. **The applicant has calculated the parking code incorrectly and is attempting to only calculate parking on the front retail portion of the facility.** The applicant has arbitrarily not allocated any parking requirements to the remaining 1,956 square feet of their space – which is not how the code calculates parking. This dispensary application is for 3,847 square feet. The parking calculation is 100% clear per Sonoma County Code 26-88-010 which states: *"Required Parking. All uses permitted in Chapter 26 of the Sonoma County Code shall provide parking according to the following formulas:…"* For a Medical Cannabis Dispensary, the required parking is *"2 spaces, including at least 1 van-accessible space; plus 1 additional space for every 200 square feet of **gross floor area**, plus 1 additional space for each employee on maximum shift; but in no case less than 5 off-street parking spaces"*. **It clearly says parking must be calculated on the "gross floor area"**. There is no carveout for any non-retail space within a medical cannabis dispensary business. **Therefore, this use requires 2 + 20 + 5 = 27 spaces.** That is equivalent to a 7.02 space per 1000 square foot ratio. The property can only accommodate 16 spaces – **therefore it is 69% under parked.** The application also does not meet the minimum employee parking requirement of 5 spaces (they are only providing 4 spaces).

There are other troubling issues such as adjacency to a bus stop across the street used by numerous families and children, and an inevitable increase in crime issues.

These major environmental and code violation issues should have PRMD terminating this application immediately. This letter is not written in opposition to cannabis dispensaries which are allowed by the Sonoma County Municipal Code. This letter is IN OPPOSITION to allowing a cannabis dispensary in a 99.9% zoned residential neighborhood with many families and hundreds of children and which is in violation of the Sonoma County Municipal Code.

Sincerely,

Xxxxxxxxx (Name)Paula B.Bunting
Xxxxxxxxx (Address)2207 Morning Side Mnt. Rd., Glen Ellen, CA, 95442

From:	julie oleson
To:	Crystal Acker
Subject:	Loe Firehouse 3,847 square foot Cannabis Dispensary, 15499 Arnold Drive, Glen Ellen
Date:	March 26, 2021 7:10:24 PM
Attachments:	Julie Oleson Objection to Neg Dec for Loe Firehouse Dispensary 3-26-21.pdf

March 25, 2021

Crystal Acker, M.S. ***Letter sent via email – Crystal.Acker@sonoma-county.org*** Planner III
County of Sonoma
PRMD - Planning Division | Project Review

2550 Ventura Avenue, Santa Rosa, CA 95403

Re: Loe Firehouse 3,847 square foot Cannabis Dispensary, 15499 Arnold Drive, Glen Ellen

Dear Ms. Acker,

In addition to the reasons with specific details below, I object to approval of the Negative Declaration for this project because:

1. Traffic will negatively impact the major commute route through Sonoma Valley . This location on Arnold Drive is at the 4-way stop intersection with Madrone Rd, already a point of major commute traffic congestion. Madrone Rd is the major connector between Arnold Dr and Highway 12. It is the primary route for commuters who bypass the highly congested Highway 12 route through downtown Sonoma, because they are commuting from Napa, Vallejo, and points east to Santa Rosa and points north. In an effort to relieve congestion on this critical north-south artery of Arnold Dr, about 7 years ago, the County built a roundabout to replace the 4-way stop on Arnold Dr at Agua Caliente. Going south, the next connector between Arnold Drive and Highway 12 was Boyes Blvd, which has a signal light, but is closed to through traffic for the multi-year rebuilding of the Sonoma Creek bridge. It would be logical to expect that, when this project substantially increases traffic congestion at the Arnold Dr intersection with Madrone Rd, either a signal light, or another roundabout would be required. Since the need for the signal or roundabout would be triggered by traffic generated by this project, that signal or roundabout should be paid for by the developers of this project.

2. My second point is from an Area-wide Planning Perspective. I do not know the status of the application for a dispensary along Highway 12 in Kenwood. However, that location is much more suitable, since it is already a retail area, unlike this project, in the middle of a long-established residential area. The distance between the two locations is very short, only 7 miles. Residents of this area regularly do business at Kenwood retail and downtown Glen Ellen retail. From a Sonoma Valley planning perspective, or even from a broader Sonoma County planning perspective, it does not make sense to approve two dispensaries this close together. Citizens reasonably expect dispensaries to be geographically dispersed in retail locations throughout Sonoma County.

Neither of these two issues was considered in the Negative Declaration, and both require the more in- depth Environmental Impact Study, before this project can be considered for

approval.

The scheduled Board of Zoning Adjustment hearing on April 8, 2021 should DISAPPROVE a Negative Declaration for CEQA approval of the above project for two major reasons:

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1. **100 FOOT RESIDENTIAL SETBACK.** A cannabis dispensary must be at least 100 feet from a residentially zoned property unless a “physical separation” exists between land uses or parcels such that no offsite impacts could occur. **Five residential properties are within 100 feet of the proposed dispensary.** No physical separation of any kind exists between these five residential parcels and the proposed cannabis dispensary. PRMD initially stated to the community that “a public street” represents physical separation. A “public street” is actually the direct opposite of “physical separation” – it is “public access”. When it was pointed out to PRMD that the 121-unit apartment project is 57 feet from the dispensary location – **and not separated by a “public street”** - PRMD then opined in June 2018 that the market/burrito store in between the two properties represented “physical separation” even though you can walk directly on Madrone Road from one property to the other. These arguments make no sense and clearly do not meet the intent of the Sonoma County Code of Ordinances. Fortunately, in the 2018 approved Cannabis Cultivation Ordinance Resolution 18-003, the County has now defined physical separation as follows in Sections 26-88-254 f (6)

and f (8): *"Physical equivalent separation exists due to topography, vegetation or slope."* That is now the County standard for the term "physical separation". There is no topography, vegetation or slope between the proposed cannabis dispensary and the five residential properties. **The "Environmental Pollution Solutions December 21, 2019" memorandum is highly flawed and under their assumptions, every property in Sonoma County would qualify as allowable for a cannabis dispensary within 100 feet of a residential property.**

2. **INSUFFICIENT PARKING**. The Applicant has proposed 17 spaces on their site plan but one space does not meet County Code. PRMD has confirmed that that the cannabis dispensary is legally only providing 16 parking spaces. **The applicant has calculated the parking code**

incorrectly and is attempting to only calculate parking on the front retail portion of the facility. The applicant has arbitrarily not allocated any parking requirements to the remaining 1,956 square feet of their space – which is not how the code calculates parking. This dispensary application is for 3,847 square feet. The parking calculation is 100% clear per

Sonoma County Code shall provide parking according to the following formulas:..." For a

Sonoma County

Code 26-88-010 which states: "*Required Parking. All uses permitted in Chapter 26 of the*

Medical Cannabis Dispensary, the required parking is *"2 spaces, including at least 1 van-accessible space; plus 1 additional space for every 200 square feet of* ***gross floor area****, plus 1 additional space for each employee on maximum shift; but in no case less than 5 off-street parking spaces"*. **It clearly says parking must be calculated on the "gross floor area"**.

There is no carveout for any non-retail space within a medical cannabis dispensary business.

Therefore, this use requires 2 + 20 + 5 = 27 spaces. That is equivalent to a 7.02 space per

1000 square foot ratio. The property can only accommodate 16 spaces – **therefore it is 69%**

under parked. The application also does not meet the minimum employee parking

requirement of 5 spaces (they are only providing 4 spaces).

There are other troubling issues such as adjacency to a bus stop across the street used by numerous families and children, and an inevitable increase in crime issues.

These major environmental and code violation issues should have PRMD terminating this application immediately. This letter is not written in opposition to cannabis dispensaries which are allowed by the Sonoma County Municipal Code. This letter is IN OPPOSITION to allowing a cannabis dispensary in a 99.9% zoned residential neighborhood with many families and hundreds of children and which is in violation of

the Sonoma County Municipal Code.

Sincerely,

Julie Oleson

Julie Oleson
1700 Morningside Mtn Glen Ellen, CA 95442

From: Barb Roy
To: Crystal Acker
Subject: UPC 17-0094, APN 054-130-024, 15499 Arnold Drive
Date: March 26, 2021 1:58:15 PM

EXTERNAL

A great deal of effort goes into land use regulations in Sonoma County. While, as residents, we may be individually impacted by them, for the most part and for most people, we accept their purpose as the greater good for the community.

As the project is reported in the Kenwood Press, it is surprising that the "impacts on people" was found to be "less than significant" when the location is within 100 feet of a residential neighborhood as is not allowed by regulation. Additionally, it is a school bus stop. There is also a red zone for street parking which may well impact the neighborhood. Most residents don't have the time and resources to find a way to bypass the rules.

The applicant, according to the Press, believes he should not be bound by the rules because he has "roots running deep into the local community", however, he does not live in Glen Ellen. Some have argued that Glen Ellen has stores that sell alcohol within 100 feet of residential areas, however, these stores also sell groceries and sundries and therefore benefit the community. There seems to be little of benefit to the community of Glen Ellen that warrants abandoning the safeguards put in place by the County to protect neighborhoods.

We join with the other residents of Glen Ellen who believe this location is inappropriate and not compliant with the regulations meant to separate such businesses from residential neighborhoods.

Thank you,
Barbara and Patrick Roy
1310 Hill Road
Glen Ellen

Sent from my iPad

From: Ellen McKnight
To: Crystal Acker
Subject: opposed to dispensary at 15499Arnold Dr, Glen Ellen
Date: March 28, 2021 10:15:14 PM

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re: Permit Sonoma File No.UPC17-0094

Dear Crystal: I think it is unwise to allow a cannabis dispensary at 15499 Arnold Dr. for the following reasons:
1: this corner will be very busy one when the SDC project gets underway, as this will be the closest connection between Hwy 12 and Arnold Drive, there are many children who wait for the bus to and from school here, the parking is inadequate at this location, and will degrade the current family neighborhood and lower property values, as well as increasing crime.
2:Even more importantly, CBD is a cannabis product that will be sold here and there are multiple warnings about CBD being sold in dispensaries, as they ARE NOT approved by the FDA and therefore it's illegal to sell them in dispensaries or anywhere else.
3. The FDA has prosecuted many companies selling these illegal products
4. Even the Sonoma County Official Guide to using Cannabis Products recommends following the FDA guidelines, as many of these products are very harmful to children and adults.
5.Please have enough sense to follow both the FDA and Sonoma County Guidelines and do NOT allow this proposed dispensary to operate in Glen Ellen. (in case you are wondering, I am a retired Women's Health Nurse Practitioner who had a Furnishing License and had quite a bit of training in this matter.
Ellen Bundschu McKnight, retired WHNP.

From: Rudy
To: Crystal Acker
Subject: Glen Ellen Dispensary
Date: March 29, 2021 7:28:33 AM

Hello, my name is Rudy Palomares, I am Sonoma county local resident and cannabis supporter. I'm writing to you today in support of the upcoming Glen Ellen dispensary. I personally think it's a much needed and greatly anticipated change for the Glen Ellen community. Following the approval of the dispensary this will provide medicinal and recreational aid to customers in need. Glen Ellen is the ideal location because locals like myself won't have to travel miles aways to get to the next dispensary, not only wasting gas for myself, but also producing unnecessary carbon emissions. I feel that this dispensary is a good opportunity for us to bring another gem to our community, a positive attraction just like a winery, and through this, property values and business will go up. Opposers will try and argue that with opening this dispensary problems will arise such as parking, traffic and crime. But these aren't true. It's proven through in depth studies that traffic won't be Affected, And if anything positive tourist attraction will come with this dispensary. Cannabis isn't like alcohol. People are less likely to commit crimes with cannabis in comparison to liquor or wine, which is sold at a store usually at every street corner. With parking, the dispensary has its own parking lot and customers aren't known for staying longer than 5-10 minutes during a pick up. The fact of the matter is people in our community are afraid of change. So I say open this dispensary and let's bring community's together and bring positive attraction to Glen Ellen.
Thank you.
Sincerely,
Rudy Palomares.

From: FAITH ALVARADO
To: Crystal Acker
Subject: Glen Ellen Dispensary Support Letter
Date: March 29, 2021 11:09:59 PM
Attachments: glen ellen.pdf

EXTERNAL

Hello,

To whom it may concern please view the attached document letter written in support of the new coming Glen Ellen dispensary.

Thank You,

Faith

Hello,

To Whom It may concern I, Faith Alvarado, wish to express my support for the new coming dispensary in Glen Ellen. I am a local resident of Sonoma County and full-time employee of a Restaurant Supply chain. As a resident I feel that by adding this new dispensary it will bring change to the community for the better and create an outlet for those seeking medicinal and recreational cannabis products. Having a local dispensary will provide convenience for locals in the area who will no longer need to travel elsewhere.

Aside from the customers personal gain I believe this new addition will bring positive business and create a new village attraction for passing visitors and long term residents. Adding a new dispensary will help circulate money throughout the community, and also prove to be a benefactor to neighboring businesses by providing a larger scale of new clientele in the surrounding area. New jobs will be open and available for community members to join, which would greatly support those struggling to find work during such a rough pandemic. Those who are concerned or are opposed to the opening of this business will try to argue that it will create disruption and unnecessary traffic in the streets or unwanted attention but I fully disagree. Street parking would be available and or the dispensary will provide a reserved parking lot for customers that in no way could severely disrupt the flow of everyday traffic.

I feel completely comfortable and safe with a cannabis dispensary in my residential area and I am sure many others do as well. The approval that was made by the city for this facility to soon be open to the public provides a sense of comfort in its own means, considering the time and thought the board must have taken to analyze the safety of the citizens that could potentially be impacted and deemed it safe enough to continue and proceed to add this soon to be hot spot. Thank you for taking the time to read this letter of support.

Regards,

Faith Alvarado

From:	Stephen Brett
To:	Ellen McKnight
Cc:	Crystal Acker
Subject:	Re: opposed to dispensary at 15499Arnold Dr, Glen Ellen
Date:	March 29, 2021 9:28:19 AM

Dear Crystal : I've been writing on this subject, most recently to Susan Goren. I completely agree with Ms. McKnight. I would like to add a huge irony to this. Somehow there's an extremely strict set of laws regarding cigarette smoking .I'm in favor of all that.But, why is marijuana smoking so coddled here ? Aside from the fact that today's marijuana is multiple times stronger than what was smoked in the 60's, the inhalation /use of this gateway drug is that much more dangerous. Cigarette smokers are well aware and mindful of the troubles they get into by smoking in social settings and commercial space. On the contrary, marijuana smokers are NOT on the whole. I regularly observe marijuana smokers smoking anywhere they please and no one enforces anything regarding their smoking. Everything is surrounded and cloaked, officially, law enforcement -wise etc unbder ther banner: "Well, Gee, Marijuana is legal. in California " - as if there are NO RULKES. That may not be the fact, (no rules) but this is the way it comes down.
Lastly : Driving and operational matters. I grew up in a city of 9,000,000 people . I was not a poor kid and got around and drove the highways, boulevards, avenues ,turnpikes etc etc of New York and Long Island through age 28 ; We listened to the radio ,watched the news and socialized with tons of people.We were on top of everything happeneing -inlcudied oin the congested streets and roads.
THERE WAS NOTHING LIKE THE KIND OF ROAD AND PEDESTRIAN MASSASCRES OCCURRING OUT HERE IN SONOMA, ON ROUTE 12 AND TH8IS AREA. NOTHING !! Now why is that?
No wineries , strict alcohol controls and VERY STRICT LAW ENFORCEMENT(and penalties). What do we have here : Wineries galore .Tasting Rooms galore . And VERY WEAK AND SPARSE LAW ENFORCEMENT . Hence , all the head on collisions, people driving over embankments and tons of people run over while walking .AND WE HAVE DISTRACTED DRIVING -people looking anywhere but through their windshields as they text and talk . SO, CRYSTAL : DO WE REALLY WANT TO ADD MARIJUANA AND INFUSED WINE WITH MARIJUANA ? How many more deaths do we need on our hands ????
The myth of the NEED for a dispensary is a joke in itself. Are people wanting for pot ? Don't make me laugh.
Yours,Steve Brett , Glen Ellen ,

On Sun, Mar 28, 2021 at 10:15 PM Ellen McKnight <ellenbmcknight@gmail.com> wrote:

> re: Permit Sonoma File No.UPC17-0094
>
> Dear Crystal: I think it is unwise to allow a cannabis dispensary at 15499 Arnold Dr. for the following reasons:
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Ellen Bundschu McKnight, retired WHNP.

From:	Edward A. Dougherty
To:	Crystal Acker
Cc:	eadougherty@attglobal.net
Subject:	Loe Firehouse 3,847 square foot Cannabis Dispensary, 15499 Arnold
Date:	March 29, 2021 3:06:42 PM

Dear Ms. Acker:

Re: Loe Firehouse 3,847 square foot Cannabis Dispensary, 15499 Arnold Drive, Glen Ellen

We are writing to register our opposition to the approval of the above project. We live at 15600 Arnold and strongly note the congestion and traffic problems that will result from the proposed location. There is very little or no parking in the area now, and this approval will compound the issues and make the already busy road situation that much more unsafe due to increased traffic, double parking, and related problems. The Arnold /Madrone intersection is already subject to high traffic flow and this development will exacerbate the existing issues. We also understand that an approval of this project is inconsistent with or in violation of existing Code or planning policy.

Ed and Linda Dougherty

15600 Arnold Drive

415-860-2762

P.O. Box 1436

Glen Ellen, CA

From: Donna Nonemountry
To: Crystal Acker
Subject: Cannabis project
Date: March 29, 2021 11:44:42 AM

I am one of the people who supports legal cannabis. For instance there is extremely low crime in license cannabis business. This cannabis business is suitable for the neighborhood especially for people who needs it for medical use.

From: David Oslislo
To: Crystal Acker
Subject: Glen Ellen cannabis dispensary proposed
Date: March 29, 2021 11:44:47 AM

Crystal

I believe this would be great for the community as well as bring in a local revenue stream. As Marijuana becomes a part of life why not have it where we as a community can also benefit.

concerned
Citizen
David

From: Dave palmgren
To: Crystal Acker
Subject: John Lobro, Loe Firehouse, Inc., Permit Sonoma File No. UPC 17 – 0094
Date: March 29, 2021 10:59:30 PM

Crystal,

Re: John Lobro, Loe Firehouse, Inc., Permit Sonoma File No. UPC 17 – 0094

I am vehemently opposed to the Cannabis Dispensary, proposed for the Loe Firehouse at the corner of Madrone Rd and Arnold Drive in Glen Ellen.

This would be a low blow to our Neighborhood!

I strongly urge our representatives on the planning commission and on the board of supervisors to deny this application and to not waive the distance rule in the County Ordinance.

I measured the distance of the property lines to the following single family home addresses just South of the proposed site: 998 Glenwood Drive – 32', 989 – 54', 990 – 78', 983 – 81', 982 – 112', 975 – 115'. I have lived in the Rancho Madrone neighborhood for 25 years, at 964 Glenwood Drive, my property is less than 200' from the firehouse.

A cannabis dispensary must be at least 100 feet from a residentially zoned property unless a "physical separation" exists between land uses or parcels such that no offsite impacts could occur. Four single family homes are within 100' of the proposed dispensary. No physical separation of any kind exists between these parcels and the proposed dispensary and offsite impacts are significant.

Immediately to the East is the Rancho Madrone family market and the Grove apartment complex; owners of both properties are against the proposed use. I estimate that approximately 10 apartments are within 100' of the proposed dispensary to the North and East.

Immediately to the North is a single-family home that was zoned as commercial due to a former art gallery housed in a temporary tiny house in the front yard. The Grove apartments extend over to Arnold Drive just North of the former "Arlene's Art Gallery" now closed for business.

To the West, only Arnold Drive separates the site from more residential properties, but to construe a road as a physical separation is ridiculous. It is just the opposite!

The negative impact of this proposed business being jammed into a small island of a property surrounded on all sides by residential would be detrimental to property values.

Since dispensaries are often targets for theft, security measures will need to be added and the neighborhood would be downgraded as a result of the added risk to public safety.

Since the property is woefully short on parking spaces, dispensary customers will use Glenwood Drive for overflow parking and we are already absorbing overflow parking from Rancho Market.

Commuters use Madrone road as a major artery as they travel up and down Sonoma Valley, using it to connect from Hwy 12 to Arnold Drive. We have already experienced more traffic noise over recent years and adding even more traffic to this intersection would be another drawback to the neighborhood.

Furthermore, the local school bus drops off students on Arnold Drive at the proposed site and a public park is within approximately 1000 feet.

This is simply the wrong location for a dispensary, it should be located in a business district with ample access, parking and distance from homes.

Please note – a cannabis dispensary has been approved that is 4 miles to South of this site in a commercial zone Sonoma.

Also, the proposed conversion of the corner firehouse to cannabis dispensary was rejected by the Sonoma Valley Citizens Advisory Committee in 2019.

We trust the board of planning commissioners and the board of supervisors will stand in support of our neighborhood and vote according to the intent of the distance ordinance.

Please confirm receipt.

Thank you for your time.

Sincerely,

Dave Palmgren

964 Glenwood Drive Sonoma, CA 95475

dave.palmgren1@gmail.com

707-319-2050 cell

From: MS
To: Crystal Acker
Subject: Loe Firehouse Dispensary
Date: March 29, 2021 8:14:14 AM

I just wanted to show support for this project. Currently there is nowhere in the nearby area to purchase cannabis legally. I feel like this will be a great benefit to this community. Especially by creating new jobs.

Thank you for your time,
Mark

Valley of the Moon Alliance

March 29, 2021

Via E-Mail @ Crystal.Acker@sonoma-county.org

Crystal Acker
Planner III
Permit Sonoma
County of Sonoma

Re: UPC17-0094: Cannabis Dispensary proposed at 15499 Arnold Drive

Dear Ms. Acker,

The Valley of the Moon Alliance (VOTMA) submits comments on the February 26, 2021 Notice of Intent (NOI) to adopt a draft Initial Study and Negative Declaration (IS/ND) for the referenced project. Although VOTMA does not oppose the establishment of cannabis dispensaries within Sonoma Valley per se, VOTMA believes that such projects are only appropriate where they fully comply with the Sonoma County's Code of Regulations and are otherwise appropriately screened and mitigated for adverse environmental impacts. Neither of those pre-conditions appear to be satisfied for this project.

Proximity to Residential Parcels: As reflected on the aerial map on page 5 of the IS/ND and described in the "Setting" discussion on page 2, the proposed location appears to be located very close to residential zoned parcels on several sides. Code Section 26-88-256 requires that a medical cannabis dispensary may not be established on any parcel within 100 feet of a residential zoning district. Section 26-88-256 provides for a decision-maker override option of the location restriction where an "actual physical separation exists between land uses or parcels such that no off-site impacts could occur." From the aerial map on page 5 it appears that a driveway into parcel 054-130-047 may well be within 100 feet of the project parcel. There is no physical barrier on the street side sidewalk/path that runs from the project parcel to parcel 047. Since the 047 parcel is a high density (R3) residential development it is difficult to see how Permit Sonoma (PS) could conclude that there was no possibility that off-site impacts "could occur." In any event, the IS/ND does not address Code Section 26-88-256, the 100 foot exclusion, and the absence of a physical barrier, and thus appears deficient to that extent.

Proximity to Sonoma Development Center site: Neither the traffic studies nor the IS/ND address the proximity to the SDC site less than a mile north. The SDC site is vacant and easily accessible. It is a known development site and must be considered in the context of traffic and other impacts. Since the SDC site is not currently operational, the traffic volumes at Madrone and Arnold Drive in the W-Trans TIS almost certainly understate the expected/anticipated future conditions once the SDC has been revitalized. Development of SDC is years away but the IS/ND ignores that effect in assessing 2040 "Future Conditions" (July 24, 2018 TIS, pg. 10).

Underestimate of Likely Trip Generation: W-Tran's TIS methodology (TIS, pg. 13) for estimating trip generation is curious on several fronts. After indicating that the 2017 *Trip Generation Manual* daily rate for marijuana dispensary is based on a small sample size of four studies, W-Trans states "two of the data points are outliers that appear to overestimate the number of daily trips produced by a dispensary of the size of the proposed project." W-Trans thus eliminated those data points. The effect of that data management produces a rate that W-Trans concludes "appears to more reasonably estimate daily trips." That estimate, with two of the four data points eliminated, reduced the dispensary trip generation from 478 trips to 291 trips per day. Combined with the assumption that the 1,956 sq ft second floor should be characterized as a general light industrial use generating only 10 trips per day, and not an adjunct storage and operational element of the dispensary, the W-Trans TIS resulted in a net increase trip generation of 263 daily trips for the project. The rate with all studies is higher.

The likely reality is that there is no clear good estimate of what trip generation from this project will actually be. But we do know that at least for the time being it would be the only dispensary in Sonoma Valley. That suggests that eliminating the "outliers" from the *Trip Generation Manual* that produce far higher trip estimates would not be the appropriate approach here.

Traffic impacts are hard to forecast. VOTMA suggests a precautionary approach: a) initially impose a reservation system for all purchasers, b) limit the aggregate daily reservations accepted to a small defined number, and c) schedule a one year (with follow ups) review of how that experience worked out. After reviewing the applicant's year-one operational reports and the traffic impacts, consider whether to either tighten, relax or eliminate that reservation approach based on that experience. Releasing the site to all comers at the outset is not wise.

VOTMA understands that the County has implemented a medical cannabis reservation system in the past as a means to reasonably assess and control actual operational impacts. The IS/ND should evaluate and implement such a mitigation approach here given the uncertainties and impacts associated with underestimation of actual trip generation.

Thank you for the opportunity to comment on the proposed project and the IS/ND.

Kathy Pons
President
Valley of the Moon Alliance

From:	Williams, Bari
To:	Crystal Acker
Subject:	Glen Ellen dispensary
Date:	March 29, 2021 11:13:27 AM

EXTERNAL

I am a Sonoma resident and fully support this location for a medical dispensary.
Local residents have to drive to Santa Rosa for medical marijuana which I find to be very inconvenient for locals.
I do not believe that this will have any impact on traffic at this corner, and the location meets the strict GUI lines by the county.
Please approve this location !!!!!!

Bari Williams
Real Estate Professional

Sonoma Valley
Top 5% in Sales Volume Sonoma Valley

D: 707.738.9709
Bari.Williams@sothebyshomes.com
BariWilliams.com

Sotheby's International Realty
25 E Napa St.
Sonoma , CA 95476
DRE:01263855

March 15, 2021

Crystal Acker, M.S.
Planner III
County of Sonoma
PRMD - Planning Division | Project Review
2550 Ventura Avenue, Santa Rosa, CA 95403

Letter sent via email – Crystal.Acker@sonoma-county.org

Re: Loe Firehouse 3,847 square foot Cannabis Dispensary, 15499 Arnold Drive, Glen Ellen
Sonoma File No. UPC17-0094

Dear Ms. Acker,

The scheduled Board of Zoning Adjustment hearing on April 8, 2021 should DISAPPROVE a Negative Declaration for CEQA approval of the above project for two major reasons:

First, the Negative Declaration is highly flawed in its consideration of traffic and parking at this facility, given the applicants projected rates of trips and visits (see page 2 of the January 4, 2021 W-Trans Traffic Study) and prejudicial in its failure to consider the astounding projected increase over current usage.

- Daily Trips for this proposed facility increase from 38 trips to 301, **a 792% increase**.
- Peak Hour Weekday AM Trips increase from 4 to 21, **a 525% increase.**
- Peak Hour Weekday PM Trips increase from 6 to 42, **a 700% increase**.
- Peak Hour Weekend PM Trips increase from 2 to 70, **an unheard of 3500% increase**.

The traffic impacts from only 12 guest parking spaces will also be astounding and permanently detrimental to this residential neighborhood. There is no calculation made of the average time spent in the store by a customer evaluating possible purchases and completing necessary requirements for a transaction. Assuming an average of 30 minutes, this means that on a weekday there will be at least 12 cars per hour trying to find spaces on Madrone Road or Marty Way, since no near parking on Arnold Drive is available. This increases to at least 44 cars per hour at peak times on weekend trying to park in a very small residential area, where street parking is already occupied by local residents. It is incomprehensible that this impact has not been considered, or that it is considered to meet the May 2016 Traffic Operation Standard that "parking demand is accommodated." Further, see below – the proposed Project does not provide the required parking per the Sonoma County Municipal Code.

Second, the Application is in direct violation of the Sonoma County Municipal Code on two counts:

1. **100 FOOT RESIDENTIAL SETBACK.** A cannabis dispensary must be at least 100 feet from a residentially zoned property unless a "physical separation" exists between land uses or parcels such that no offsite impacts could occur. **Five residential properties are within 100 feet of the proposed dispensary.** No physical separation of any kind exists between these five residential parcels and the proposed cannabis dispensary. PRMD initially stated to the community that "a public street" represents physical separation. A "public street" is actually the direct opposite of "physical separation" – it is "public access". When it was pointed out to

PRMD that the 121-unit apartment project is 57 feet from the dispensary location – **and not separated by a "public street"** - PRMD then opined in June 2018 that the market/burrito store in between the two properties represented "physical separation" even though you can walk directly on Madrone Road from one property to the other. These arguments make no sense and clearly do not meet the intent of the Sonoma County Code of Ordinances. Fortunately, in the 2018 approved Cannabis Cultivation Ordinance Resolution 18-003, the County has now defined physical separation as follows in Sections 26-88-254 f (6) and f (8): *"Physical equivalent separation exists due to topography, vegetation or slope."* That is now the County standard for the term "physical separation". There is no topography, vegetation or slope between the proposed cannabis dispensary and the five residential properties. **The "Environmental Pollution Solutions December 21, 2019" memorandum is highly flawed and under their assumptions, every property in Sonoma County would qualify as allowable for a cannabis dispensary within 100 feet of a residential property.**

2. **INSUFFICIENT PARKING**. The Applicant has proposed 17 spaces on their site plan but one space does not meet County Code. PRMD has confirmed that that the cannabis dispensary is legally only providing 16 parking spaces. **The applicant has calculated the parking code incorrectly and is attempting to only calculate parking on the front retail portion of the facility.** The applicant has arbitrarily not allocated any parking requirements to the remaining 1,956 square feet of their space – which is not how the code calculates parking. This dispensary application is for 3,847 square feet. The parking calculation is 100% clear per Sonoma County Code 26-88-010 which states: *"Required Parking. All uses permitted in Chapter 26 of the Sonoma County Code shall provide parking according to the following formulas:..."* For a Medical Cannabis Dispensary, the required parking is *"2 spaces, including at least 1 van-accessible space; plus 1 additional space for every 200 square feet of* ***gross floor area****, plus 1 additional space for each employee on maximum shift; but in no case less than 5 off-street parking spaces"*. **It clearly says parking must be calculated on the "gross floor area"**. There is no carveout for any non-retail space within a medical cannabis dispensary business. **Therefore, this use requires 2 + 20 + 5 = 27 spaces.** That is equivalent to a 7.02 space per 1000 square foot ratio. The property can only accommodate 16 spaces – **therefore it is 69% under parked.** The application also does not meet the minimum employee parking requirement of 5 spaces (they are only providing 4 spaces).

There are other troubling issues such as adjacency to a bus stop across the street used by numerous families and children, and an inevitable increase in crime issues.

These major environmental and code violation issues should have PRMD terminating this application immediately. This letter is not written in opposition to cannabis dispensaries which are allowed by the Sonoma County Municipal Code. This letter is IN OPPOSITION to allowing a cannabis dispensary in a 99.9% zoned residential neighborhood with many families and hundreds of children and which is in violation of the Sonoma County Municipal Code.

Sincerely,

Name Daniel Arietta

Address 905 Sonoma Glen Circle, Glen Ellen CA 95442

March 15, 2021

Crystal Acker, M.S.
Planner III
County of Sonoma
PRMD - Planning Division | Project Review
2550 Ventura Avenue, Santa Rosa, CA 95403

Letter sent via email – Crystal.Acker@sonoma-county.org

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Sonoma File No. UPC17-0094

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Sincerely,

Name Dayna Arietta
Address 905 Sonoma Glen Circle, Glen Ellen CA 95442

March 15, 2021

Crystal Acker, M.S. *Letter sent via email – Crystal.Acker@sonomacounty.org*
Planner III
County of Sonoma
PRMD - Planning Division | Project Review
2550 Ventura Avenue, Santa Rosa, CA 95403

Re: Loe Firehouse 3,847 square foot Cannabis Dispensary, 15499 Arnold Drive, Glen Ellen
Sonoma File No. UPC17-0094

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Sincerely, Louis E Barton

Name LOUIS BARTON

Address 892 MADRONE RD
SONOMA, CA 95476

March 15, 2021

Crystal Acker, M.S.
Planner III
County of Sonoma
PRMD - Planning Division | Project Review
2550 Ventura Avenue, Santa Rosa, CA 95403

Letter sent via email – Crystal.Acker@sonoma-county.org

Re: Loe Firehouse 3,847 square foot Cannabis Dispensary, 15499 Arnold Drive, Glen Ellen
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Vicki L Baseheart

Name Vicki L Baseheart
Address 15241 Marty Dr
Glen Ellen CA 95442

March 15, 2021

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Planner III
County of Sonoma
PRMD - Planning Division | Project Review
2550 Ventura Avenue, Santa Rosa, CA 95403

Letter sent via email – Crystal.Acker@sonoma-county.org

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Name JAMES M. BLAKE
Address 15429 WOODSIDE COURT
GLEN ELLEN, CA 95442

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Planner III
County of Sonoma
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Barbara Chatham

Name Barbara Chatham
Address 15244 Arnold Dr
Glen Ellen, Ca

March 15, 2021

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2550 Ventura Avenue, Santa Rosa, CA 95403

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Name Sharon I. Church
Address 15241 Marty Dr.
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Sincerely,

Mary Fedarchak
Name
Address
9102 Sonoma Glen Cir
Glen Ellen Ca
95442

March 15, 2021

Crystal Acker, M.S.
Planner III
County of Sonoma
PRMD - Planning Division | Project Review
2550 Ventura Avenue, Santa Rosa, CA 95403

Letter sent via email – Crystal.Acker@sonoma-county.org

Re: Loe Firehouse 3,847 square foot Cannabis Dispensary, 15499 Arnold Drive, Glen Ellen
Sonoma File No. UPC17-0094

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Name
Address

9462 Sonoma Glen Cir
Glen Ellen, Ca 95442

March 15, 2021

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Planner III
County of Sonoma
PRMD - Planning Division | Project Review
2550 Ventura Avenue, Santa Rosa, CA 95403

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Sincerely, Anne Goldmann

Name
Address 893 Glenwood Dr
Sonoma Ca 95476

NOTICE OF INTENT TO ADOPT A NEGETIVE DECLARATION PURSUANT TO THE CALIFIRNIA ENVIROMENTAL QUALITY ACT FOR A CANNABIS DISPENSARY USE PERMIT

Expanded Initial Study
File # UPC 17-0094

Opposition Issues & Facts Against Dispensary Location

- 150 Patrons per day
- Parking spaces - 12 Public - 5 Employee
- Corner bus stop for Sonoma Valley Transit and local school bus
- Sonoma Valley Citizen Advisory Commission May 23, 2018 voted not to recommend this project for approval.
- During this meeting on May 23, 2018 Mr. Labro (applicant for cannabis dispensary at Madrone and Arnold Dr.) addressing another Use Permit Applicant became so outrage the entire Commission had to declare a recess and all commissioners had to leave the room.
- Because previous comments, letters, petitions and signatures apposing this project were not in response to a formal public review period or County action, they were simply registered to the project file.
- Most recent public notification was distributed in February 2021 was to only 300 residence within 1000' ($1/5^{th}$ of a mile) of the parcel located at 15499 Arnold Dr. Glen Ellen.
- Many times, the following statement is mentioned throughout this study, "There are no operating dispensaries in Sonoma Valley area or in the City of Sonoma"
- August 18, 2020 article in Sonoma Index Tribune Sparc cannabis company will receive Sonoma's lone business license to operate a storefront dispensary in the city limits located at 19315 Sonoma Highway (Previously Mexican restaurant next to Lucky's shopping Center). The dispensary has been approved for operation in 2021 and will be staffed by 15 to 20 employees.
- The state required double-locked entrance, additional lighting, additional security fencing and/or gates is not mentioned in study.
- Cannabis dispensaries odors can occur from such facilities if not properly managed.
- Zoning had been previously changed to limited commercial only to accommodate a firehouse request, not for a cannabis dispensary.
- Sonoma County will not allow a cannabis dispensary within a 1,000' of a park. Strong consideration should be given to the fact that Moran-Goodman Park 980 Sonoma Glen Circle is 1,001' from project.

Traffic Impact Study for the Apothevert Dispensary July 24, 2018

- This study indicates a "left-turn lane is not warranted on Arnold Drive or Madrone Road at the project entrance". This will be a very unsafe situation.
- **Traffic Impact Study Dated July 24, 2018. County of Sonoma Guidelines for Traffic Studies will only be acceptable if it is less than two years old.**

March 15, 2021

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Planner III
County of Sonoma
PRMD - Planning Division | Project Review
2550 Ventura Avenue, Santa Rosa, CA 95403

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Sincerely,

Name Darren W Goodman
Address 15399 Thomas St.
Glen Ellen, Ca. 95442

March 15, 2021

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Planner III
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Name DON Goodman
Address 825 Madrone Rd. - Glen Ellen, 95442 Ca.

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Sincerely,

Name
Address

mailing address:
Karen Lynn Goodman
P.O. Box 38
Eldridge, Ca. 95431
Karen Goodman

Physical address:
825 Madrone Rd.
Glen Ellen, Ca. 95442

March 15, 2021

Crystal Acker, M.S.
Planner III
County of Sonoma
PRMD - Planning Division | Project Review
2550 Ventura Avenue, Santa Rosa, CA 95403

Letter sent via email – Crystal.Acker@sonoma-county.org

Re: Loe Firehouse 3,847 square foot Cannabis Dispensary, 15499 Arnold Drive, Glen Ellen
Sonoma File No. UPC17-0094

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Sincerely,

Mark Hamilton

Name
Address 912 Jane Ct
Glen Ellen CA 95442

March 15, 2021

Crystal Acker, M.S.
Planner III
County of Sonoma
PRMD - Planning Division | Project Review
2550 Ventura Avenue, Santa Rosa, CA 95403

Letter sent via email – Crystal.Acker@sonoma-county.org

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Name Vicki Handon

Address 912 Jane Ct
Glen Ellen 95442

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2550 Ventura Avenue, Santa Rosa, CA 95403

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Name Lisa M. Hidalgo
Address 911 Jane Ct.
Glen Ellen, CA
95442

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2550 Ventura Avenue, Santa Rosa, CA 95403

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NOTICE OF INTENT TO ADOPT A NEGETIVE DECLARATION PURSUANT TO THE CALIFIRNIA ENVIROMENTAL QUALITY ACT FOR A CANNABIS DISPENSARY USE PERMIT

Expanded Initial Study
File # UPC 17-0094

Opposition Issues & Facts Against Dispensary Location

- 150 Patrons per day
- Parking spaces - 12 Public - 5 Employee
- Corner bus stop for Sonoma Valley Transit and local school bus
- Sonoma Valley Citizen Advisory Commission May 23, 2018 voted not to recommend this project for approval.
- During this meeting on May 23, 2018 Mr. Labro (applicant for cannabis dispensary at Madrone and Arnold Dr.) addressing another Use Permit Applicant became so outrage the entire Commission had to declare a recess and all commissioners had to leave the room.
- Because previous comments, letters, petitions and signatures apposing this project were not in response to a formal public review period or County action, they were simply registered to the project file.
- Most recent public notification was distributed in February 2021 was to only 300 residence within 1000' ($1/5^{th}$ of a mile) of the parcel located at 15499 Arnold Dr. Glen Ellen.
- Many times, the following statement is mentioned throughout this study, "There are no operating dispensaries in Sonoma Valley area or in the City of Sonoma"
- August 18, 2020 article in Sonoma Index Tribune Sparc cannabis company will receive Sonoma's lone business license to operate a storefront dispensary in the city limits located at 19315 Sonoma Highway (Previously Mexican restaurant next to Lucky's shopping Center). The dispensary has been approved for operation in 2021 and will be staffed by 15 to 20 employees.
- The state required double-locked entrance, additional lighting, additional security fencing and/or gates is not mentioned in study.
- Cannabis dispensaries odors can occur from such facilities if not properly managed.
- Zoning had been previously changed to limited commercial only to accommodate a firehouse request, not for a cannabis dispensary.
- Sonoma County will not allow a cannabis dispensary within a 1,000' of a park. Strong consideration should be given to the fact that Moran-Goodman Park 980 Sonoma Glen Circle is 1,001' from project.

Traffic Impact Study for the Apothevert Dispensary
July 24, 2018

- This study indicates a "left-turn lane is not warranted on Arnold Drive or Madrone Road at the project entrance". This will be a very unsafe situation.
- **Traffic Impact Study Dated July 24, 2018. County of Sonoma Guidelines for Traffic Studies will only be acceptable if it is less than two years old.**

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Name ROSALEEN HILL Rosaleen Hill

Address 860 MADRONE ROAD, 95476
Glen Ellen

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Sincerely,

Name Kathleen Maestas-Horner

Address 19050 Orange Avenue
Sonoma, CA 95476

March 15, 2021

Crystal Acker, M.S.
Planner III
County of Sonoma
PRMD - Planning Division | Project Review
2550 Ventura Avenue, Santa Rosa, CA 95403

Letter sent via email – Crystal.Acker@sonoma-county.org

Re: Loe Firehouse 3,847 square foot Cannabis Dispensary, 15499 Arnold Drive, Glen Ellen
Sonoma File No. UPC17-0094

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Sincerely,

Name EARL M. HORNER III
Address 19050 ORANGE AVE.
SONOMA. CA. 95476

March 15, 2021

Crystal Acker, M.S.
Planner III
County of Sonoma
PRMD - Planning Division | Project Review
2550 Ventura Avenue, Santa Rosa, CA 95403

Letter sent via email – Crystal.Acker@sonoma-county.org

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Mary Clark Janis

Name Mary Clark Janis

Address 15244 Arnold Dr.
Glen Ellen, Ca. 95442

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Sincerely,

Name Juanita Pineros
Address 15573 Arnold Dr
Sonoma CA 95476

NOTICE OF INTENT TO ADOPT A NEGETIVE DECLARATION PURSUANT TO THE CALIFIRNIA ENVIROMENTAL QUALITY ACT FOR A CANNABIS DISPENSARY USE PERMIT

Expanded Initial Study
File # UPC 17-0094

Opposition Issues & Facts Against Dispensary Location

- 150 Patrons per day
- Parking spaces - 12 Public - 5 Employee
- Corner bus stop for Sonoma Valley Transit and local school bus
- Sonoma Valley Citizen Advisory Commission May 23, 2018 voted not to recommend this project for approval.
- During this meeting on May 23, 2018 Mr. Labro (applicant for cannabis dispensary at Madrone and Arnold Dr.) addressing another Use Permit Applicant became so outrage the entire Commission had to declare a recess and all commissioners had to leave the room.
- Because previous comments, letters, petitions and signatures apposing this project were not in response to a formal public review period or County action, they were simply registered to the project file.
- Most recent public notification was distributed in February 2021 was to only 300 residence within 1000' ($1/5^{th}$ of a mile) of the parcel located at 15499 Arnold Dr. Glen Ellen.
- Many times, the following statement is mentioned throughout this study, "There are no operating dispensaries in Sonoma Valley area or in the City of Sonoma"
- August 18, 2020 article in Sonoma Index Tribune Sparc cannabis company will receive Sonoma's lone business license to operate a storefront dispensary in the city limits located at 19315 Sonoma Highway (Previously Mexican restaurant next to Lucky's shopping Center). The dispensary has been approved for operation in 2021 and will be staffed by 15 to 20 employees.
- The state required double-locked entrance, additional lighting, additional security fencing and/or gates is not mentioned in study.
- Cannabis dispensaries odors can occur from such facilities if not properly managed.
- Zoning had been previously changed to limited commercial only to accommodate a firehouse request, not for a cannabis dispensary.
- Sonoma County will not allow a cannabis dispensary within a 1,000' of a park. Strong consideration should be given to the fact that Moran-Goodman Park 980 Sonoma Glen Circle is 1,001' from project.

Traffic Impact Study for the Apothevert Dispensary July 24, 2018

- This study indicates a "left-turn lane is not warranted on Arnold Drive or Madrone Road at the project entrance". This will be a very unsafe situation.
- **Traffic Impact Study Dated July 24, 2018. County of Sonoma Guidelines for Traffic Studies will only be acceptable if it is less than two years old.**

March 15, 2021

Crystal Acker, M.S.
Planner III
County of Sonoma
PRMD - Planning Division | Project Review
2550 Ventura Avenue, Santa Rosa, CA 95403

Letter sent via email – Crystal.Acker@sonoma-county.org

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Susanne Kaufhold

Name Susanne Kaufhold
Address 938 Glenwood Drive
Sonoma, California
95476-3224

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Sincerely, Gary G. Kelechava

Name GARY G. KELECHAVA
Address 948 Sonoma Glen Circle
Glen Ellen, CA 95442

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Sincerely, Rhonda S Keller 3-23-21

Name Rhonda S Keller

Address 15565 Maplewood Dr
Sonoma, CA 95476

RECEIVED
MAR 2 6 2021
PERMIT AND RESOURCE MANAGEMENT DEPARTMENT
COUNTY OF SONOMA

March 15, 2021

Crystal Acker, M.S.
Planner III
County of Sonoma
PRMD - Planning Division | Project Review
2550 Ventura Avenue, Santa Rosa, CA 95403

Letter sent via email – Crystal.Acker@sonoma-county.org

Re: Loe Firehouse 3,847 square foot Cannabis Dispensary, 15499 Arnold Drive, Glen Ellen
Sonoma File No. UPC17-0094

Dear Ms. Acker,

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Sincerely,

Name Maria Kinolau & Benjamin Nakawaya
Address 15346 Marty DR
Glen Ellen CA 95442

Maria Kinolau
15346 MARTY DR
GLEN ELLEN, CA
95442

NOTICE OF INTENT TO ADOPT A NEGETIVE DECLARATION PURSUANT TO THE CALIFIRNIA ENVIROMENTAL QUALITY ACT FOR A CANNABIS DISPENSARY USE PERMIT

Expanded Initial Study
File # UPC 17-0094

Opposition Issues & Facts Against Dispensary Location

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July 24, 2018

- This study indicates a "left-turn lane is not warranted on Arnold Drive or Madrone Road at the project entrance". This will be a very unsafe situation.
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I also would like to add that the trash from some patrons will end up on our streets I have seen it at countless dispensaries & we have a lack of police patrol in an area already starting to fill with crime.

March 15, 2021

Crystal Acker, M.S.
Planner III
County of Sonoma
PRMD - Planning Division | Project Review
2550 Ventura Avenue, Santa Rosa, CA 95403

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Sincerely, Dolly Kirtley

Name Dolly Kirtley
Address 932 Madrone Rd.
Sonoma, Ca 95476

March 15, 2021

Crystal Acker, M.S.
Planner III
County of Sonoma
PRMD - Planning Division | Project Review
2550 Ventura Avenue, Santa Rosa, CA 95403

Letter sent via email – Crystal.Acker@sonoma-county.org

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Sincerely,

Name
Address

Olivia Klassen 67 Guadalajara Dr Sonoma CA 95476
Andrew Elliott " " " "
Judith D Arneo 790 W. Thurlsen Ave, Sonoma, 95476

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Sincerely,

Christine Leonard

Name Christine Leonard

Address 948 Sonoma Glen Circle
Glen Ellen, CA 95442

March 15, 2021

Crystal Acker, M.S.
Planner III
County of Sonoma
PRMD - Planning Division | Project Review
2550 Ventura Avenue, Santa Rosa, CA 95403

Letter sent via email – Crystal.Acker@sonoma-county.org

Re: Loe Firehouse 3,847 square foot Cannabis Dispensary, 15499 Arnold Drive, Glen Ellen
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Sincerely,

Name Marilyn J Lewis
Address 846 Oakwood Dr
Sonoma, CA 95476

March 15, 2021

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Planner III
County of Sonoma
PRMD - Planning Division | Project Review
2550 Ventura Avenue, Santa Rosa, CA 95403

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Sincerely,

Alane McCrea

Name ALANE McCREA
Address 4170 GROVE ST
SONOMA, CA 95476
707 996-9089

ADDITIONAL CONCERN ON REVERSE

The primary agencies are well known to the targets of armed robberies - this location would be ideal for robbery due to isolated area, almost 0 highway patrol and no nearby police officer.

I will be happy to discuss this if you contact me - Sorry 787 996-2089

NOTICE OF INTENT TO ADOPT A NEGETIVE DECLARATION PURSUANT TO THE CALIFIRNIA ENVIROMENTAL QUALITY ACT FOR A CANNABIS DISPENSARY USE PERMIT

Expanded Initial Study
File # UPC 17-0094

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Julienne H Michelena

Name JuLienne H MicheLena

Address 15230 ARNOLd Dr

GLen ELLen, CA 95442

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Name MISTER AND MRS. William Morgantini

Address 15571 MAPLEWOOD DR SONOMA, CA. 95476

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Sincerely,

Name
Address

March 15, 2021

Crystal Acker, M.S.
Planner III
County of Sonoma
PRMD - Planning Division | Project Review
2550 Ventura Avenue, Santa Rosa, CA 95403

Letter sent via email – Crystal.Acker@sonoma-county.org

Re: Loe Firehouse 3,847 square foot Cannabis Dispensary, 15499 Arnold Drive, Glen Ellen
Sonoma File No. UPC17-0094

Dear Ms. Acker,

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Name
Address

March 15, 2021

Crystal Acker, M.S. *Letter sent via email – Crystal.Acker@sonoma-county.org*
Planner III
County of Sonoma
PRMD - Planning Division | Project Review
2550 Ventura Avenue, Santa Rosa, CA 95403

Re: Loe Firehouse 3,847 square foot Cannabis Dispensary, 15499 Arnold Drive, Glen Ellen
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Sincerely,

Name Tryce Alvarez-Pihl & Michael Pihl
Address 926 Glenwood Dr.
Sonoma, CA 95476

March 15, 2021

Crystal Acker, M.S.
Planner III
County of Sonoma
PRMD - Planning Division | Project Review
2550 Ventura Avenue, Santa Rosa, CA 95403

Letter sent via email – Crystal.Acker@sonoma-county.org

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Sincerely,

Emily Robledo

Name Emily Robledo
Address 934 Sonoma Glen Circle
Glen Ellen, CA 95442

March 15, 2021

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Planner III
County of Sonoma
PRMD - Planning Division | Project Review
2550 Ventura Avenue, Santa Rosa, CA 95403

Letter sent via email – Crystal.Acker@sonoma-county.org

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Sincerely,

Name Osvaldo Robledo
Address 937 Sonoma Glen Circle
Glen Ellen, 95442

March 22, 2021

Crystal Acker, M. S.
Project Planner
County of Sonoma
PRMD – Planning Division I Project Review
2550 Ventura Avenue, Santa Rosa, CA 95403

Reference Permit Sonoma File No. UPC17-0094

Dear Ms. Acker,

We are writing with great concern over the possibility that our County could approve an application that would allow a Cannabis Dispensary here in our residential neighborhood. The property in question is not in a currently commercial area and is immediately adjacent to many private homes and apartments in our neighborhood. Not only is it on a very busy main artery, it is on an intersection with the only direct road to Glen Ellen and the only connecting street to Highway 12 that is within several miles of our homes. Traffic and parking would be a major concern at this location.

Many of our neighbors who have children in the close-by elementary school and have called our attention to the dangers involved in having this project inserted in our neighborhood. We haven't heard one person comment that they thought a dispensary of this type would be good for the people who live here.

I'm enclosing a copy of another letter to you which lists many reasons why this DISAPPROVAL should be made and we ask that you review these reasons carefully and do all that you can to see that permission to sell Cannabis near our home is denied.

Very truly yours,

Stephen H. Sherer
Elizabeth B. Sherer

Stephen H. Sherer & Elizabeth B. Sherer
1750 Morningside Mt. Rd.
Glen Ellen, CA 95442

March 15, 2021

Crystal Acker, M.S. Planner III
County of Sonoma
PRMD - Planning Division | Project Review
2550 Ventura Avenue, Santa Rosa, CA 95403

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Sincerely,

Stephen H. Sherer

Elizabeth B. Sherer

March 15, 2021

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Planner III
County of Sonoma
PRMD - Planning Division | Project Review
2550 Ventura Avenue, Santa Rosa, CA 95403

Letter sent via email – Crystal.Acker@sonoma-county.org

Re: Loe Firehouse 3,847 square foot Cannabis Dispensary, 15499 Arnold Drive, Glen Ellen
Sonoma File No. UPC17-0094

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Sincerely,

Name A A Bindley

Address 1 Wood Lawn
Glen Ellen, Ca.
95442

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Expanded Initial Study
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County of Sonoma
PRMD - Planning Division | Project Review
2550 Ventura Avenue, Santa Rosa, CA 95403

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Name Barry Valiasek
Address 915 Caton Ct.
Sonoma, CA. 95476

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Tjisko Van Wyk

Name Tjisko Van Wyk
Address 15234 Arnold Dr.
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Sincerely,

Name Tomasa P. Velazquez
Address

March 23, 2021

Dear Ms. Icker,

Hello, I am writing to express our disapproval for a proposed cannabis dispensary at 15499 Arnold Drive, Glen Ellen, California. Sonoma file No. UPC17-0094

A dispensary at that location is hugely problematic on many fronts:

1. This is a residential area with many families with small children
2. The allocated parking is extremely insufficient
3. Arnold Drive is one of two routes traversing Sonoma Valley and Madrone Road is one of the main connectors between Hwy 12 and Arnold Drive. The increased traffic assumptions are drastically underestimated.
4. The entrance and exit from the undersized parking lot is to close to a four way Stop sign at Arnold & Madrone Road. If someone is making a left turn from the parking lot onto Arnold they have only about sixty feet to the stop sign where they need to stop. All the while contending with cars turning right onto Arnold from Madrone, cars continuing North on Arnold, and cars going South on Arnold.

Just to name some of the issues. We urge you to please disapprove this project

Doris Margo VanHaaren - 1877 Morningside Mt. Dr.

March 15, 2021

Crystal Acker, M.S.
Planner III
County of Sonoma
PRMD - Planning Division | Project Review
2550 Ventura Avenue, Santa Rosa, CA 95403

Letter sent via email – Crystal.Acker@sonoma-county.org

Re: Loe Firehouse 3,847 square foot Cannabis Dispensary, 15499 Arnold Drive, Glen Ellen
Sonoma File No. UPC17-0094

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Sincerely,

Heidi Winslow

Name Heidi Winslow
Address 998 Sonoma Glen Circle
Glen Ellen, CA. 95442

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Planner III
County of Sonoma
PRMD - Planning Division | Project Review
2550 Ventura Avenue, Santa Rosa, CA 95403

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Sincerely,

Name Dave & Connie Wells
Address 200 Cecelia Drive
Glen Ellen, Calif. 95442

NOTICE OF INTENT TO ADOPT A NEGETIVE DECLARATION PURSUANT TO THE CALIFIRNIA ENVIROMENTAL QUALITY ACT FOR A CANNABIS DISPENSARY USE PERMIT

Expanded Initial Study
File # UPC 17-0094

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March 15, 2021

Crystal Acker, M.S. *Letter sent via email – Crystal.Acker@sonoma-county.org*
Planner III
County of Sonoma
PRMD - Planning Division | Project Review
2550 Ventura Avenue, Santa Rosa, CA 95403

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Sincerely,

Cara Young

Name Cara Young
Address 940 Glenwood Dr
Sonoma, CA 95476

March 15, 2021

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Planner III
County of Sonoma
PRMD - Planning Division | Project Review
2550 Ventura Avenue, Santa Rosa, CA 95403

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Lori Ajax

Name Lori Ajax
Address 854 Oakwood Dr.
Sonoma, CA 95476

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The scheduled Board of Zoning Adjustment hearing on April 8, 2021 should DISAPPROVE a Negative Declaration for CEQA approval of the above project for two major reasons:

First, the Negative Declaration is highly flawed in its consideration of traffic and parking at this facility, given the applicants projected rates of trips and visits (see page 2 of the January 4, 2021 W-Trans Traffic Study) and prejudicial in its failure to consider the astounding projected increase over current usage.

- Daily Trips for this proposed facility increase from 38 trips to 301, **a 792% increase**.
- Peak Hour Weekday AM Trips increase from 4 to 21, **a 525% increase.**
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Sincerely,

Jane Bertorelli

Name JANE BERTORELLI
Address 15580 Maplewood Dr
Sonoma CA 95476

March 15, 2021

Crystal Acker, M.S.
Planner III
County of Sonoma
PRMD - Planning Division | Project Review
2550 Ventura Avenue, Santa Rosa, CA 95403

Letter sent via email – Crystal.Acker@sonoma-county.org

Re: Loe Firehouse 3,847 square foot Cannabis Dispensary, 15499 Arnold Drive, Glen Ellen
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Sincerely,

Name JEREMY BRANCONI

Address 1100 SONOMA GLEN CIRCLE

GLEN ELLEN, CA. 95442

March 15, 2021

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Planner III
County of Sonoma
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Sincerely, Judy Condon 15561 Arnold Dr.
Mikal Condon Same Address
Name Mike Ng
Address " "

NOTICE OF INTENT TO ADOPT A NEGETIVE DECLARATION PURSUANT TO THE CALIFIRNIA ENVIROMENTAL QUALITY ACT FOR A CANNABIS DISPENSARY USE PERMIT

Expanded Initial Study
File # UPC 17-0094

Opposition Issues & Facts Against Dispensary Location

- 150 Patrons per day
- Parking spaces - 12 Public - 5 Employee
- Corner bus stop for Sonoma Valley Transit and local school bus
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Sincerely, Owen Edwards (and Regina)

Name OWEN EDWARDS
Address 830 MADRONE RD
SONOMA CA
95476

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Sincerely,

Name CRAIG NICOL
Address 15100 ARNOLD DRIVE, 95442
GLEN ELLEN, CA

March 15, 2021

Crystal Acker, M.S. ***Letter sent via email – Crystal.Acker@sonoma-county.org***
Planner III
County of Sonoma
PRMD - Planning Division | Project Review
2550 Ventura Avenue, Santa Rosa, CA 95403

Re: Loe Firehouse 3,847 square foot Cannabis Dispensary, 15499 Arnold Drive, Glen Ellen
Sonoma File No. UPC17-0094

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Sincerely,

Darrell Osbourn

3/24/01

Name
Address

Darrell Osbourn
912 Caton Ct
Sonoma, CA 95476

NOTICE OF INTENT TO ADOPT A NEGETIVE DECLARATION PURSUANT TO THE CALIFIRNIA ENVIROMENTAL QUALITY ACT FOR A CANNABIS DISPENSARY USE PERMIT

Expanded Initial Study
File # UPC 17-0094

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- 150 Patrons per day
- Parking spaces - 12 Public - 5 Employee
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- Sonoma Valley Citizen Advisory Commission May 23, 2018 voted not to recommend this project for approval.
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March 15, 2021

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County of Sonoma
PRMD - Planning Division | Project Review
2550 Ventura Avenue, Santa Rosa, CA 95403

Letter sent via email – Crystal.Acker@sonoma-county.org

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Name

Address 834 Marty Drive
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95442

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Name Jordan + Jeremy Parker

Address 868 Madrone Rd

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File # UPC 17-0094

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March 15, 2021

Crystal Acker, M.S.
Planner III
County of Sonoma
PRMD - Planning Division | Project Review
2550 Ventura Avenue, Santa Rosa, CA 95403

Letter sent via email – Crystal.Acker@sonoma-county.org

Re: Loe Firehouse 3,847 square foot Cannabis Dispensary, 15499 Arnold Drive, Glen Ellen
Sonoma File No. UPC17-0094

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Sincerely,

Name Ed Sillari

Address 15140 ARNOLD DR
Glen Ellen, CA. 95442

March 15, 2021

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Planner III
County of Sonoma
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2550 Ventura Avenue, Santa Rosa, CA 95403

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Name ARDENA SPRINKLE
Address 725 CRCENIA DR

March 15, 2021

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County of Sonoma
PRMD - Planning Division | Project Review
2550 Ventura Avenue, Santa Rosa, CA 95403

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Melissa Stevier

Name

Address 862 Oakwood Dr
Sonoma Ca 95476

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Address 958 Glenwood Dr.
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PRMD that the 121-unit apartment project is 57 feet from the dispensary location – **and not separated by a "public street"** - PRMD then opined in June 2018 that the market/burrito store in between the two properties represented "physical separation" even though you can walk directly on Madrone Road from one property to the other. These arguments make no sense and clearly do not meet the intent of the Sonoma County Code of Ordinances. Fortunately, in the 2018 approved Cannabis Cultivation Ordinance Resolution 18-003, the County has now defined physical separation as follows in Sections 26-88-254 f (6) and f (8): *"Physical equivalent separation exists due to topography, vegetation or slope."* That is now the County standard for the term "physical separation". There is no topography, vegetation or slope between the proposed cannabis dispensary and the five residential properties. **The "Environmental Pollution Solutions December 21, 2019" memorandum is highly flawed and under their assumptions, every property in Sonoma County would qualify as allowable for a cannabis dispensary within 100 feet of a residential property.**

2. **INSUFFICIENT PARKING.** The Applicant has proposed 17 spaces on their site plan but one space does not meet County Code. PRMD has confirmed that that the cannabis dispensary is legally only providing 16 parking spaces. **The applicant has calculated the parking code incorrectly and is attempting to only calculate parking on the front retail portion of the facility.** The applicant has arbitrarily not allocated any parking requirements to the remaining 1,956 square feet of their space – which is not how the code calculates parking. This dispensary application is for 3,847 square feet. The parking calculation is 100% clear per Sonoma County Code 26-88-010 which states: "*Required Parking. All uses permitted in Chapter 26 of the Sonoma County Code shall provide parking according to the following formulas:...*" For a Medical Cannabis Dispensary, the required parking is *"2 spaces, including at least 1 van-accessible space; plus 1 additional space for every 200 square feet of* ***gross floor area****, plus 1 additional space for each employee on maximum shift; but in no case less than 5 off-street parking spaces".* **It clearly says parking must be calculated on the "gross floor area".** There is no carveout for any non-retail space within a medical cannabis dispensary business. **Therefore, this use requires 2 + 20 + 5 = 27 spaces.** That is equivalent to a 7.02 space per 1000 square foot ratio. The property can only accommodate 16 spaces – **therefore it is 69% under parked.** The application also does not meet the minimum employee parking requirement of 5 spaces (they are only providing 4 spaces).

There are other troubling issues such as adjacency to a bus stop across the street used by numerous families and children, and an inevitable increase in crime issues.

These major environmental and code violation issues should have PRMD terminating this application immediately. This letter is not written in opposition to cannabis dispensaries which are allowed by the Sonoma County Municipal Code. This letter is IN OPPOSITION to allowing a cannabis dispensary in a 99.9% zoned residential neighborhood with many families and hundreds of children and which is in violation of the Sonoma County Municipal Code.

Sincerely, 3/23/2021

Name Robert T. Winovich

Address 907 Jane Ct.
Glen Ellen, CA 95442
(510) 326-8895

In addition to the above comments please take the time to read my additional comments on the reverse side.

3/23/2021

As with all business ventures and Real Estate transactions, knowing to do Due Diligence prior to setting the wheels in Motion is the Best Practice. This is not the "Best" location for such a business. The proprietor should have done his/her Due Diligence prior to this even getting to the permit process. Chosing to set-up shop in a vacant space in Jack London Village would be much better! the infrastructure is all there! Also with the advent of the Sonoma Developmental Center being reimagined, a location on those grounds would be much more appropriate (Ie: Parking/Traffic/residential seperation could all be addressed prior to development).

Let us not forget that cannabis is a drug, albeit a legal drug is still a drug. All that goes with cannabis is not good. Our family neighborhood is Not the best location for a drug dealership. Lastly, if it is determined that the permit is approved for the business and due to the inevitable increase in traffic in the intersection of Madrone + Arnold, The time would be ripe for the county to ask that the proprietor assist with the cost of installation of a traffic signal light at the corner of Madrone + Arnold, similarly as was done at Madrone and Highway 12 to allow the opening of Hanzel Family Wine to the public. Thank you for your time to review all opinions and I value your service to our community!

NOTICE OF INTENT TO ADOPT A NEGETIVE DECLARATION PURSUANT TO THE CALIFIRNIA ENVIROMENTAL QUALITY ACT FOR A CANNABIS DISPENSARY USE PERMIT

Expanded Initial Stndy
File # UPC 17-0094

Opposition Issues & Facts Against Dispensary Location

- 150 Patrons per day
- Parking spaces - 12 Public - 5 Employee
- Corner bus stop for Sonoma Valley Transit and local school bus
- Sonoma Valley Citizen Advisory Commission May 23, 2018 voted not to recommend this project for approval.
- During this meeting on May 23, 2018 Mr. Labro (applicant for cannabis dispensary at Madrone and Arnold Dr.) addressing another Use Permit Applicant became so outrage the entire Commission had to declare a recess and all commissioners had to leave the room.
- Because previous comments, letters, petitions and signatures apposing this project were not in response to a formal public review period or County action, they were simply registered to the project file.
- Most recent public notification was distributed in February 2021 was to only 300 residence within 1000' ($1/5^{th}$ of a mile) of the parcel located at 15499 Arnold Dr. Glen Ellen.
- Many times, the following statement is mentioned throughout this study, "There are no operating dispensaries in Sonoma Valley area or in the City of Sonoma"
- August 18, 2020 article in Sonoma Index Tribune Sparc cannabis company will receive Sonoma's lone business license to operate a storefront dispensary in the city limits located at 19315 Sonoma Highway (Previously Mexican restaurant next to Lucky's shopping Center). The dispensary has been approved for operation in 2021 and will be staffed by 15 to 20 employees.
- The state required double-locked entrance, additional lighting, additional security fencing and/or gates is not mentioned in study.
- Cannabis dispensaries odors can occur from such facilities if not properly managed.
- Zoning had been previously changed to limited commercial only to accommodate a firehouse request, not for a cannabis dispensary.
- Sonoma County will not allow a cannabis dispensary within a 1,000' of a park. Strong consideration should be given to the fact that Moran-Goodman Park 980 Sonoma Glen Circle is 1,001' from project.

Traffic Impact Study for the Apothevert Dispensary July 24, 2018

- This study indicates a "left-turn lane is not warranted on Arnold Drive or Madrone Road at the project entrance". This will be a very unsafe situation.
- **Traffic Impact Study Dated July 24, 2018. County of Sonoma Guidelines for Traffic Studies will only be acceptable if it is less than two years old.**

From:	Pete Harrison
To:	Crystal Acker
Cc:	Sue Maloney
Subject:	Madrone/Arnold cannabis dispensary
Date:	March 30, 2021 8:10:02 AM

We are shocked to hear that a cannabis dispensary is being considered at the corner of Madrone and Arnold.

Ignoring cannabis politics and safety, their plans for over 150 daily customers would have a significant negative impact.

This is a quiet residential area, filled with homes and kids, within a mile of the middle school, at the intersection of single lane country roads and 4-way stop sign, not a good commercial area.

There have already been multiple vehicular and biking accidents and fatalities nearby, due to the narrow roads, traffic volumes and winery tourists.

This is also near the Sonoma Developmental Center, which may create future traffic issues, and it seems any local expansion or planning should be based on the final SDC plans.

Thanks for considering.

Pete and Sue Harrison
99 Cavedale Rd
Sonoma, CA 95476

https://www.sonomanews.com/article/news/plans-move-forward-for-glen-ellen-dispensary

From: rmulato22
To: Crystal Acker
Subject: Dispensary
Date: March 30, 2021 9:08:54 AM

Hello,
I dont understand how its taken to long to open this dispensary. I just read the article and it says the application was submitted in 2018. A dispensary in Glen Ellen would be amazing and i strongly agree. Talk of rising crime rates around dispensaries is absurd. I see only positivity when talking about opening this dispensary. Now more than ever we should be pushing for natural whole wellness medicine, not only to heal those in need but to open the doors to other posibilities of healing the community. Thank you

From: hendryaaron31@yahoo.com
To: Crystal Acker
Subject: 15499 Arnold Drive proposed dispensary.
Date: March 30, 2021 7:49:39 PM

EXTERNAL

Hello,
As original attendees to the 2018 hearing on this matter, my wife and I would like to show our continued support of the proposed dispensary site. As Sonoma County natives we actually love our short drive into this absolutely beautiful area in the Valley of the Moon. Knowing this area quite well and enjoying all the local restaurants and wine tasting, it only seems fitting to add a medical dispensary that would actually complement the area.
We look forward to seeing this proposed plan granted.

Sincerely
Aaron & Genevieve

Sent from Aaron's mobile office

From: Lizardo Rodriguez
To: Crystal Acker
Subject: Hi there
Date: March 30, 2021 10:01:15 PM

I support the opening of this dispensary in glen ellen, since in my opinion and my own experience, cannabies help me to relax my nerves, and for that reason to open and have cannabis service in the community it will be convenient for me , as long as everything is aga without excess.

Lizardo

Sent from my iPhone

From: Ellen McKnight
To: Crystal Acker
Subject: Re: Recent article: FDA warnings about CBD
Date: March 31, 2021 10:08:04 AM
Attachments: FDA warns against unapproved CBD products.pdf

> See attached PDF, Ellen
>
> Subject: Recent article: FDA warnings about CBD
> To: Crystal.Acker@sonoma-county.org <Crystal.Acker@sonoma-county.org>
>
> https://www.healio.com/news/rheumatology/20210322/fda-warns-against-unapproved-cbd-products-touting-arthritis-pain-relief

March 22, 2021 3 min read

FDA warns against 'unapproved CBD products' touting arthritis pain relief

The FDA has issued warning letters to Honest Globe Inc. and Biolyte Laboratories LLC for allegedly illegally marketing unapproved, over-the-counter drugs labeled as containing cannabidiol, or CBD, for arthritis and other pain indications.

"The FDA continues to alert the public to potential safety and efficacy concerns with unapproved CBD products sold online and in stores across the country," FDA Principal Deputy Commissioner **Amy Abernethy, MD, PhD,** said in a press release. "It's important that consumers understand that the FDA has only approved one drug containing CBD as an ingredient. These other, unapproved, CBD products may have dangerous health impacts and side effects."

"It's important that consumers understand that the FDA has only approved one drug containing CBD as an ingredient," FDA Principal Deputy Commissioner **Amy Abernethy, MD, PhD,** said in a press release. "These other, unapproved, CBD products may have dangerous health impacts and side effects." Source: Adobe Stock

The FDA warning letter to Honest Globe, based in Santa Ana, California, specifically targets the company's "Elixicure Original Pain Relief" and "Elixicure Lavender Pain Relief" products, both of which are labeled to contain CBD and claim to relieve pain related to arthritis, muscle strains, cramps, back aches and tendonitis.

In the letter, dated March 15, 2021, the FDA alleged that these products are unapproved new drugs that are being marketed in violation of the Federal Food, Drug, and Cosmetic Act (FD&C Act).

Amy Abernethy

Meanwhile, in its letter to Biolyte Laboratories, in Grand Rapids, Michigan, the FDA branded the products "Silver Gel," "Silver Gel," "Silver Gel with Aloe," "Silver Liquid Supplement," "Therapeutic Pain Gel," "Pain Relief Cream" and "Magnesium Oil Spray" as unapproved new drugs. The letter, dated March 18, 2021, also alleged that the products were misbranded under the FD&C Act.

Among the named products from Biolyte Laboratories, "Therapeutic Pain Gel" and "Pain Relief Cream" are labeled to contain CBD, according to the FDA. Both products, as well as the company's "Magnesium Oil Spray," claim to relieve pain related to arthritis and other causes.

"Although CBD is labeled as an inactive ingredient in the labels of your 'Pain Relief Cream' and 'Therapeutic Pain Gel' products, the labeling for these products clearly represent CBD as an active ingredient," according to the letter to Biolyte Laboratories. "For instance, your product label for 'Pain Relief Cream' features the statement, 'Pain Relief Cream with rejuvenating CBD,' and the product label for 'Therapeutic Pain Gel' features the statement, 'CBD 560mg.'"

The letter continues: "Furthermore, even if CBD could be considered an inactive ingredient in a nonprescription drug product, that product would still need an approved new drug application to be legally marketed because the product would not be eligible for marketing under section 505G of the FD&C Act."

The FDA noted that none of the above products have been subject to its approval process, nor has there been any evaluation of whether they are effective for their claimed uses, what an appropriate dose might be, how they could interact with other drugs or products, or whether they have dangerous side effects or other safety concerns.

The FDA has requested that both companies respond within 15 working days. Failure to adequately address the violations promptly may result in legal action, including product seizure and/or injunction. The FDA has issued several similar warning letters to companies selling unapproved CBD products since 2015.

"OTC drugs must be approved by the FDA or meet the requirements for marketing without an approved new drug application under federal law, including drug products containing CBD, regardless of whether CBD is represented on the labeling as an active ingredient or an inactive ingredient," according to the FDA release.

The single CBD product approved by the FDA is Epidiolex (cannabidiol, Greenwich Biosciences), for the treatment of seizures associated with tuberous sclerosis complex, Lennox-Gastaut syndrome and Dravet syndrome.

Read next

Providers, Patients Wary to Navigate 'Confused System' of CBD Laws, Labels

Providers, patients wary to navigate 'confused system' of CBD laws, labels

"We remain focused on exploring potential pathways for CBD products to be lawfully marketed while also educating the public about these outstanding questions of CBD's safety," Abernethy said in the release. "Meanwhile, we will continue to monitor and take action, as needed, against companies that unlawfully market their products — prioritizing those that pose a risk to public health."

From: John Filippa
To: Crystal Acker
Subject: Glen Ellen Cannabis dispensary
Date: March 31, 2021 2:57:16 PM

Hi Crystal: I would like to give my support for John Lobro's dispensary. I have known John for many years and I can say that he is very professional and his dispensary will be, I'm sure, of the highest quality and a positive addition to the community. Hi standards are the highest. Glen Ellen will be well served.

John Filippa

John Filippa
john@johnfilippa.com
707-315-1119

From: Jonathan Casheros
To: Crystal Acker
Date: March 31, 2021 6:30:14 PM

I'm writing in regards to the cannabis dispensery in Glen Elen. I strongly feel that all people should have a safe place to purchase or cannabis. And a dispensery in Glen Elen would serve a community that is well under served. THANK YOU FOR YOUR TIME.
Jonathan Casheros

March 15, 2021

Crystal Acker, M.S.
Planner III
County of Sonoma
PRMD - Planning Division | Project Review
2550 Ventura Avenue, Santa Rosa, CA 95403

Letter sent via email – Crystal.Acker@sonoma-county.org

Robert A Bakyan
15556 Maplewood Dr
Sonoma

Re: Loe Firehouse 3,847 square foot Cannabis Dispensary, 15499 Arnold Drive, Glen Ellen
Sonoma File No. UPC17-0094

Dear Ms. Acker,

APPROVE

The scheduled Board of Zoning Adjustment hearing on April 8, 2021 should DISAPPROVE a Negative Declaration for CEQA approval of the above project for two major reasons:

First, the Negative Declaration is highly flawed in its consideration of traffic and parking at this facility, given the applicants projected rates of trips and visits (see page 2 of the January 4, 2021 W-Trans Traffic Study) and prejudicial in its failure to consider the astounding projected increase over current usage.

There are NO trips at present. So of course there will be an increase

- Daily Trips for this proposed facility increase from 38 trips to 301, **a 792% increase.**
- Peak Hour Weekday AM Trips increase from 4 to 21, **a 525% increase.**
- Peak Hour Weekday PM Trips increase from 6 to 42, **a 700% increase.**
- Peak Hour Weekend PM Trips increase from 2 to 70, **an unheard of 3500% increase.**

Not even possible

The traffic impacts from only 12 guest parking spaces will also be astounding and permanently detrimental to this residential neighborhood. There is no calculation made of the average time spent in the store by a customer evaluating possible purchases and completing necessary requirements for a transaction. Assuming an average of 30 minutes, this means that on a weekday there will be at least 12 cars per hour trying to find spaces on Madrone Road or Marty Way, since no near parking on Arnold Drive is available. This increases to ~~at least~~ 44 cars per hour at peak times on weekend trying to park in a very small residential area, where street parking is already occupied by local residents. It is incomprehensible that this impact has not been considered, or that it is considered to meet the May 2016 Traffic Operation Standard that "parking demand is accommodated." Further, see below – the proposed Project does not provide the required parking per the Sonoma County Municipal Code.

Second, the Application is in direct violation of the Sonoma County Municipal Code on two counts:

1. **100 FOOT RESIDENTIAL SETBACK.** A cannabis dispensary must be at least 100 feet from a residentially zoned property unless a "physical separation" exists between land uses or parcels such that no offsite impacts could occur. **Five residential properties are within 100 feet of the proposed dispensary.** No physical separation of any kind exists between these five residential parcels and the proposed cannabis dispensary. PRMD initially stated to the community that "a public street" represents physical separation. A "public street" is actually the direct opposite of "physical separation" – it is "public access". When it was pointed out to

There are fences

NOTICE OF INTENT TO ADOPT A NEGETIVE DECLARATION PURSUANT TO THE CALIFIRNIA ENVIROMENTAL QUALITY ACT FOR A CANNABIS DISPENSARY USE PERMIT

Expanded Initial Study
File # UPC 17-0094

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- Parking spaces - 12 Public - 5 Employee
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- Cannabis dispensaries odors can occur from such facilities if not properly managed.
- Zoning had been previously changed to limited commercial only to accommodate a firehouse request, not for a cannabis dispensary.
- Sonoma County will not allow a cannabis dispensary within a 1,000' of a park. Strong consideration should be given to the fact that Moran-Goodman Park 980 Sonoma Glen Circle is 1,001' from project. — The park is A block away and not in sight.

Traffic Impact Study for the Apothevert Dispensary
July 24, 2018

Traffic would be my only concern — IT would help the Rancho Market A good Thing

- This study indicates a "left-turn lane is not warranted on Arnold Drive or Madrone Road at the project entrance". This will be a very unsafe situation.
- **Traffic Impact Study Dated July 24, 2018. County of Sonoma Guidelines for Traffic Studies will only be acceptable if it is less than two years old.**

I HAVE SEEN MULTIPLE dispensaries NEAR MONTEREY ADJACENT TO NEIGHBORHOODS They are NO MORE of AN impact THAN A regular drug STORE or PHARMACY.

March 15, 2021

Crystal Acker, M.S. ***Letter sent via email – Crystal.Acker@sonoma-county.org***
Planner III
County of Sonoma
PRMD - Planning Division | Project Review
2550 Ventura Avenue, Santa Rosa, CA 95403

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Sincerely,

Johanna Barron

Name

Address

1024 Sonoma Glen Circle
Glen Ellen, CA 95442

From: Rollin
To: Crystal Acker
Subject: Cannabis Dispensary Use Permit for 15499 Arnold Dr. Glen Ellen
Date: April 01, 2021 11:09:30 AM

EXTERNAL

Hello Crystal,

I am writing in response to the Cannabis Dispensary Use Permit for the above address. We own 4 homes on Arnold, 15329, 15341, 15337 & 15333 and are strongly opposed to the dispensary going in.
My husband and I don't think this is a good fit since the area consists of mostly homes and apartments making it more residential than commercial. The idea that there would be additional traffic from 7am to 7pm everyday except Sunday doesn't sit well with us. 2 of the homes we own have families with young children in them, it just isn't a good fit.
We hope you will take this into consideration.

Thank you,
Lindsay & Rollin Bruce

Rollin Bruce Broker
Progressive Real Estate Services
1400 Sunset Dr
Petaluma Ca 94952
707-364-5550 rollinbruce@sbcglobal.net
Dre #01160933

From:	Ricardo Capretta
To:	Paul Morrison; Crystal Acker
Cc:	Caitlin Cornwall
Subject:	RE: UPC17-0094; 15499 Arnold Dr; Loe Firehouse Dispensary; Additional materials posted
Date:	April 06, 2021 4:59:35 PM
Attachments:	image007.png image008.png image009.png image010.png image011.png Loe Firehouse Building - Parking Calculations.pdf

EXTERNAL

Ms. Cornwall,

Paul informed me that we cannot present exhibits at the Thursday hearing. This exhibit is very important. Under no scenario – including the erroneous parking calculation by Crystal Acker – is the parking requirement meant. It is incredibly egregious – and frankly in my 35 years of being involved in the real estate industry and 6 years as a planning commissioner – have I seen a government agency planner not count parking on space within a building. It also fails the SONOMA County Traffic Study Guidelines Threshold thus creating a result that this project has a "significant traffic impact".

I will reference this exhibit when I speak on Thursday. Thank you for your consideration.

Ricardo Capretta

415-489-1703 (p)
415-203-7700 (c)

CAPRETTA
ARCHITECTURE
+
PLANNING
+
BUILDING

Loe Firehouse Building

Required Parking Calculations

Policy on Decimal Counts = Round Up to next whole number

Building Size: 3,897 Square Feet

As PRMD & Applicant Calculated it by forgetting to include parking for the remainder of the Building

Square Feet - Cannabis Retail Area = 1,891

Item	Spaces	
Base Requirement	2.00	PLUS
1 Additional Space per 200 SF of GROSS Floor Area	10.00	PLUS
Employees on Maximum Shift (no less than 5)	5.00	
	17.00	

PLUS REMAINING BUILDING which MUST BE INCLUDED

Square Feet - Office Area 0

Item	Spaces
1 Space per 250 SF of GROSS Floor Area	0.00
	0.00

TOTAL REQUIRED FOR BUILDING WITH INCORRECT PRMD CALCULATIONS	17.00
Minus Provided Parking	(16.00)
SHORTAGE OF PARKING =	1.00

Application has 16 legal spaces and 1 tandem space (which tandem space does not qualify as a legal space per 26-02-140)

If PRMD had included the remaining Square Footage as they are legally required to do, here are the results

Square Feet - Cannabis Retail Area = 1,891

Item	Spaces	
Base Requirement	2.00	PLUS
1 Additional Space per 200 SF of GROSS Floor Area	10.00	PLUS
Employees on Maximum Shift (no less than 5)	5.00	
	17.00	

PLUS REMAINING BUILDING which MUST BE INCLUDED

Square Feet - Office Area 2,006

Item	Spaces
1 Space per 250 SF of GROSS Floor Area	9.00
	9.00

TOTAL REQUIRED FOR BUILDING WITH INCORRECT PRMD CALCULATIONS	26.00
Minus Provided Parking	(16.00)
SHORTAGE OF PARKING =	10.00

State law and Sonoma County Code of Ordinances require that you count all parking spaces required for a building. **Sec. 26-36-030. Permitted building intensity and development criteria – Limited Commercial Zoning. (f) Parking Spaces. Parking shall be provided in accordance with the standards established in Article 86.**

As the Sonoma County Code of Ordinances Reads:

Square Feet - Cannabis FACILITY = 3,897

Item	Spaces	
Base Requirement	2.00	PLUS
1 Additional Space per 200 SF of GROSS Floor Area	20.00	PLUS
Employees on Maximum Shift (no less than 5)	5.00	
	27.00	

PLUS NO REMAINING BUILDING

Square Feet - Office Area 0

Item	Spaces
1 Space per 250 SF of GROSS Floor Area	0.00
	0.00

TOTAL REQUIRED FOR BUILDING WITH CORRECT CODE CALCULATIONS	27.00
Minus Provided Parking	(16.00)
SHORTAGE OF PARKING =	11.00

Sec. 26-02-140. - Definitions. **Parking spaces** means usable off-street area with independent access, not included within established front-yard setback, at least nine feet (9′) by twenty feet (20′) for diagonal or perpendicular vehicle parking, or at least eight feet (8′) by twenty-two feet (22′) for parallel vehicle parking.

From:	Paul Clenahan
To:	Crystal Acker
Subject:	Cannabis Dispensary / Permit UPC17-0094
Date:	April 06, 2021 9:31:16 AM

EXTERNAL

Hi Crystal,

In response to the cannabis dispensary permit application UPC17-0094 for the Loe Firehouse, I am writing to register my objection to the permit.

As a neighbor living within approximately 700ft of the site, I have good local knowledge of the location, traffic patterns etc. Aside from the local Rancho Market corner store serving the neighborhood (mostly local customers), I feel this is not an appropriate location for a retail operation. In particular for a retail operation that will draw customers from a wide area.

Issues:
* Increased traffic / visitation would disrupt this typically quiet neighborhood location
* This retail operation will result in increased arrival / departure traffic that is out of character with previous office businesses in the location
* Parking is limited in the area and already heavily utilized by surrounding residences and apartments
* Entrance / Exit to the small parking lot is close to the Arnold Dr / Madrone junction and not designed for heavy traffic volume

There are many other available locations within Sonoma Valley that are more appropriate and designed for high-volume retail traffic. Examples include Whole Foods mall; Sonoma Market mall; corner of Boyes / Hwy 12, all of which have open retail space. These locations are not only designed for retail operations, but would actually benefit from the addition of another vibrant business.

In summary, this is not a good location for a "destination" retail operation.

Regards,

Paul Clenahan
Thomas St, Glen Ellen.

From: Rob
To: Crystal Acker
Subject: Glen ellen
Date: April 05, 2021 9:58:30 PM

Hello my name is Roberta Donaldson I live in Sonoma I learned of this dispensary from a support letter I signed months ago hoping I would have a local option for my medical cannabis I would gladly support this local option if available The options available in Sonoma are no where near satisfactory. Thank you for your time and consideration.

From:	Nat George
To:	Crystal Acker
Subject:	Regarding proposed Cannabis dispensary at 15499 Arnold Dr., Glen Ellen, CA
Date:	April 05, 2021 10:49:28 PM

EXTERNAL

Hello,

Our family resides in the immediate neighborhood where the new cannabis dispensary is proposed at 15499 Arnold Dr., Glen Ellen, CA (Permit Sonoma File No. UPC17-0094).

We are opposed to a cannabis dispensary being allowed to open in this location.

This neighborhood is primarily residential, and although we're not generally opposed to cannabis as a legalized substance, we do have concerns that opening a cannabis dispensary in that particular spot is a truly odd choice that is in complete opposition to the tone of the neighborhood, and may also attract unsafe elements to our community.

We are originally from Los Angeles, and although we were initially supportive of cannabis dispensaries opening near our former home there, we have since changed our minds. Not only have we seen hard data about this, but we've also experienced over time that crime tends to increase in neighborhoods where businesses such as cannabis dispensaries open. Given that cannabis dispensaries are an entirely cash business, they are often targeted by criminals. There is also obviously a need for armed guards on site, which is kind of an odd thing to consider living next to, in a quiet rural place like Glen Ellen. Dispensaries are also known to decrease residential property values, and neighborhood desirability.

There is an apartment complex located almost immediately next to the proposed location that is full of young children and families; there are single family homes across the street, and all along Madrone and Arnold. Most of the neighborhood is residential and family-oriented.

There is *no reason* that a cannabis dispensary couldn't find a more appropriate location in Sonoma or Glen Ellen, such as in a strip mall or shopping area that isn't primarily residential.

I would urge you to reconsider issuing this permit, and would also ask the business owners to look for a more appropriate location.

Thank you,

Nat George

From: jason james
To: Crystal Acker
Subject: Glen Ellen Dispensary
Date: April 02, 2021 9:08:34 PM

EXTERNAL

We need a dispensary in the area badly. I'm all for this. My mother lives in Glen Ellen & suffers from chronic fibromyalgia. A few years ago we discovered that cannabis helps alleviate some of her pain. I procure medicine for her when I can but sometimes she has to travel to santa rosa & it's too far for her to have to travel & unsafe at times. I know a lot of her friends & others in the area would benefit greatly from having safe, local access to cannabis. She lives very close to there & thinks its a perfect location for a dispensary & so do I.

Sincerely,

Jason James

Sent from my iPhone

From: clewis1827@juno.com
To: Crystal Acker
Date: April 04, 2021 4:03:25 PM

EXTERNAL

I am writing today in support of the opening of a dispensary in Glen Ellen. There is currently no where close by to purchase the edibles that help with my chronic pain. Everyone I Have dealt with in this industry have been helpful and professional. Thank you for your consideration in this matter.

From:	Paul Morrison
To:	Crystal Acker
Cc:	Ricardo Capretta; Caitlin Cornwall
Subject:	RE: UPC17-0094; 15499 Arnold Dr; Loe Firehouse Dispensary; Additional materials posted
Date:	April 06, 2021 3:09:40 PM
Attachments:	image001.png image002.png image003.png image004.png

EXTERNAL

Crystal,

You are correct that a dispensary can be any size. I was not questioning that issue. I was questioning the very big difference in the notice general description. Stating a facility is 1,891 square feet versus its actual size of 3,847 square feet is a difference of 103.5% greater in size. To me and my neighbors, your description does not come close to matching the actual size of this facility – and therefore your notice misleads people on the true potential impact of this application. We do not believe the notice for the hearing was issued properly.

On your comment about parking, the County Code of Ordinances very clearly requires the County to count all 3,847 square feet for parking purposes – so we are in a big disagreement with you on that calculation. You cannot simply makeup new rules for how parking is calculated. You are obligated to calculate parking per the Code of Ordinances. By only including the 1,891 square feet in your parking calculation, you have only calculated parking for 49.1% of the space in the proposed application.

Thank you for your response. I am copying Caitlin Cornwall so she is aware of these issues.

Paul Morrison

From: Crystal Acker <Crystal.Acker@sonoma-county.org>
Sent: Tuesday, April 06, 2021 7:47 AM
To: Paul Morrison <pmorrison@marinwater.org>
Cc: Ricardo Capretta <rcapretta@capretta.com>
Subject: RE: UPC17-0094; 15499 Arnold Dr; Loe Firehouse Dispensary; Additional materials posted

Hi Paul,

Yes, the existing building is approximately 3,847 square feet, and the proposed retail area is currently and has always been proposed at 1,891 square feet. County Code does not limit the size of a dispensary. A dispensary could be in any size building and could have any size floor area that an applicant proposes. For new construction, staff would evaluate construction impacts for the building footprint, but since this is an existing building, staff use the size of the retail area to determine things like fire occupancy and parking needs. I thought the public might be interested in the size of the

proposed retail area, which is why I included that detail in the notice. Although there is no limit to the size of the retail floor an applicant could request, staff can and do impose Conditions of Approval that prohibit an operation from expanding beyond the approved retail area, since a larger retail space would allow a higher customer occupancy and could result in additional impacts, like parking need and trip generation, that weren't previously evaluated. To expand their retail area, an operator would have to submit a new application to modify the Use Permit. In contrast, the operator could reconfigure the size or layout of their support spaces, which would require Building Permit(s), but would not need a new Use Permit (Planning does review all building permit applications to confirm there is no expansion of the approved use).

The County Use Permit process is separate from the State licensing process. It's common for various projects to require approvals from more than one agency, and each agency may have different requirements. For example, a new winery tasting room would first need to obtain their Land Use Entitlement from the County, and then get an ABC license to serve alcohol or a health permit to serve food. Although the ABC and the Health Dept have various types of licenses, the County doesn't get involved with that, and generally the Use Permit will just include a Condition of Approval that requires all applicable approvals/licensees required by other agencies be obtained. It's the same process for a dispensary. I am aware that the State allows delivery without a retail storefront. The County ordinance does not allow this currently; delivery can only be included with a retail operation under the County ordinance.

crystal

From: Paul Morrison <pmorrison@marinwater.org>
Sent: April 05, 2021 9:07 AM
To: Crystal Acker <Crystal.Acker@sonoma-county.org>
Cc: Ricardo Capretta <rcapretta@capretta.com>
Subject: RE: UPC17-0094; 15499 Arnold Dr; Loe Firehouse Dispensary; Additional materials posted
Importance: High

Crystal,

Upon more detailed legal review of all the documents this weekend for the Loe Firehouse hearing this Thursday, we see that square footage that you have stated on the Notice for the Hearing does not match the square footage of the application. See the attached pdf file. The staff report clearly calls this out as a 3,847 square foot application and you have verified to us that this application is the same application that was proposed in 2017.

First, in Section 14-6-030 of the Sonoma County Municipal Code, we searched for your definition of a cannabis dispensary and it is clearly defined as a "facility" – not just the upfront customer retail portion.

"Dispensary" or "cannabis dispensary" means a facility operated in accordance with state law, where cannabis, cannabis products or devices for the use of cannabis or cannabis products are offered,

either individually or in any combination, for retail sale, including an establishment that delivers cannabis and cannabis products as part of retail sale.

Second, the Sonoma County Code clearly states that this must be a "facility operated in accordance with state law". See the California Business and Professions Code Division 10, Chapter 7, Section 26070 (a) (1) which clearly defines that a cannabis premises includes a physical location which commercial cannabis activities are conducted and that clearly includes back of house, storage, assembly of product and any delivery production areas. This was also confirmed by our legal representative with a phone call to this California Agency. As you will see below, a cannabis facility can actually have no upfront customer portion (it can be 100% delivery) and it still qualifies as a Cannabis Retailer according to the State of California.

BUSINESS AND PROFESSIONS CODE - BPC
DIVISION 10. Cannabis [26000 - 26260]
(Heading of Division 10 amended by Stats. 2017, Ch. 27, Sec. 3.)

CHAPTER 7. Retailers, Distributors, and Microbusinesses [26070 - 26071]
(Heading of Chapter 7 amended by Stats. 2018, Ch. 599, Sec. 8.)

26070.

Retailers, Distributors, and Microbusinesses.
(a) State licenses to be issued by the bureau related to the sale and distribution of cannabis and cannabis products are as follows:
(1) "Retailer," for the retail sale and delivery of cannabis or cannabis products to customers. A retailer shall have a licensed premises which is a physical location from which commercial cannabis activities are conducted. A retailer's premises may be closed to the public. A retailer may conduct sales exclusively by delivery.

Therefore, this notice is misleading and not accurate because the square footage is incorrect. It is a defective notice in our legal representative's opinion. A dispensary includes all of the square footage within such a facility.

Can you explain to us why the Notice was sent out with a different square footage?

Sincerely,

Paul Morrison

From: Crystal Acker <Crystal.Acker@sonoma-county.org>
Sent: Monday, April 05, 2021 8:24 AM
To: Crystal Acker <Crystal.Acker@sonoma-county.org>
Subject: RE: UPC17-0094; 15499 Arnold Dr; Loe Firehouse Dispensary; Additional materials posted

Hello,

You are receiving this email because you have requested notification on the subject project as an

interested party.

Additional public comments received from 3/24/2021 through 3/31/2021 have been posted:

https://link.edgepilot.com/s/22ce0115/-HWBfb55gECCmRw05UcsaQ?u=https://share.sonoma-county.org/link/pKQmnwlQrKc/

Crystal Acker, M.S.
Planner III
https://link.edgepilot.com/s/4de2c3b4/nZZ1JUpN_Ui9ms1VW-YFrA?u=http://www.permitsonoma.org/
County of Sonoma
Planning Division | Project Review
2550 Ventura Avenue, Santa Rosa, CA 95403
Direct: 707-565-8357 |
Office: 707-565-1900 | Fax: 707-565-1103

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

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

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

From: Crystal Acker
Sent: March 30, 2021 7:28 AM
To: Crystal Acker <Crystal.Acker@sonoma-county.org>
Subject: RE: UPC17-0094; 15499 Arnold Dr; Loe Firehouse Dispensary; Public Notice

Hello,

You are receiving this email because you have requested notification on the subject project as an interested party.

The hearing package has been posted and is available for review here:

https://link.edgepilot.com/s/22ce0115/-HWBfb55gECCmRw05UcsaQ?u=https://share.sonoma-county.org/link/pKQmnwlQrKc/

The draft Initial Study/Negative Declaration was previously posted and is still available for review

here:

https://link.edgepilot.com/s/d70de22c/XUjd2zdtU0yFgjK-WRTAaQ?u=https://share.sonoma-county.org/link/N6akMIfRJd0/

From: Crystal Acker
Sent: March 26, 2021 5:07 PM
To: Crystal Acker <Crystal.Acker@sonoma-county.org>
Subject: UPC17-0094; 15499 Arnold Dr; Loe Firehouse Dispensary; Public Notice

Hello,

You are receiving this email because you have requested notification on the subject project as an interested party.

Please see attached legal notice.

The Hearing Agenda and the Staff Report package will be posted at the link provided in the attached notice on or before April 1, 2021 (one week before the hearing). I'll send out another email notification when it is available.

crystal

Due to Public Health Orders, Permit Sonoma will be temporarily closing to the public effective Monday, July 20 until further notice. We continue to provide services remotely minimizing person-to-person contact which helps protect our community. We look forward to serving you and will reply to your message within the next three business days. We encourage you to use our online services for permitting, records, scheduling inspections, and general questions. You can find out more about our extensive online services at permitsonoma.com

Thank you for your patience and understanding as we work together to keep our communities safe.

Crystal Acker, M.S.
Planner III
https://link.edgepilot.com/s/4de2c3b4/nZZ1JUpN_Ui9ms1VW-YFrA?u=http://www.permitsonoma.org/
County of Sonoma
Planning Division | Project Review
2550 Ventura Avenue, Santa Rosa, CA 95403
Direct: 707-565-8357 |
Office: 707-565-1900 | Fax: 707-565-1103

***OFFICE HOURS**: Permit Sonoma's public lobby is open Monday through Friday from 8:00 AM to 4:00 PM, except Wednesdays,*

From: Paul Morrison
To: Crystal Acker
Subject: UPC17-0094 - 100" setback map
Date: April 06, 2021 3:28:06 PM
Attachments: UPC17-0094 - 100" Setback Zoning & Assessor Maps.pdf

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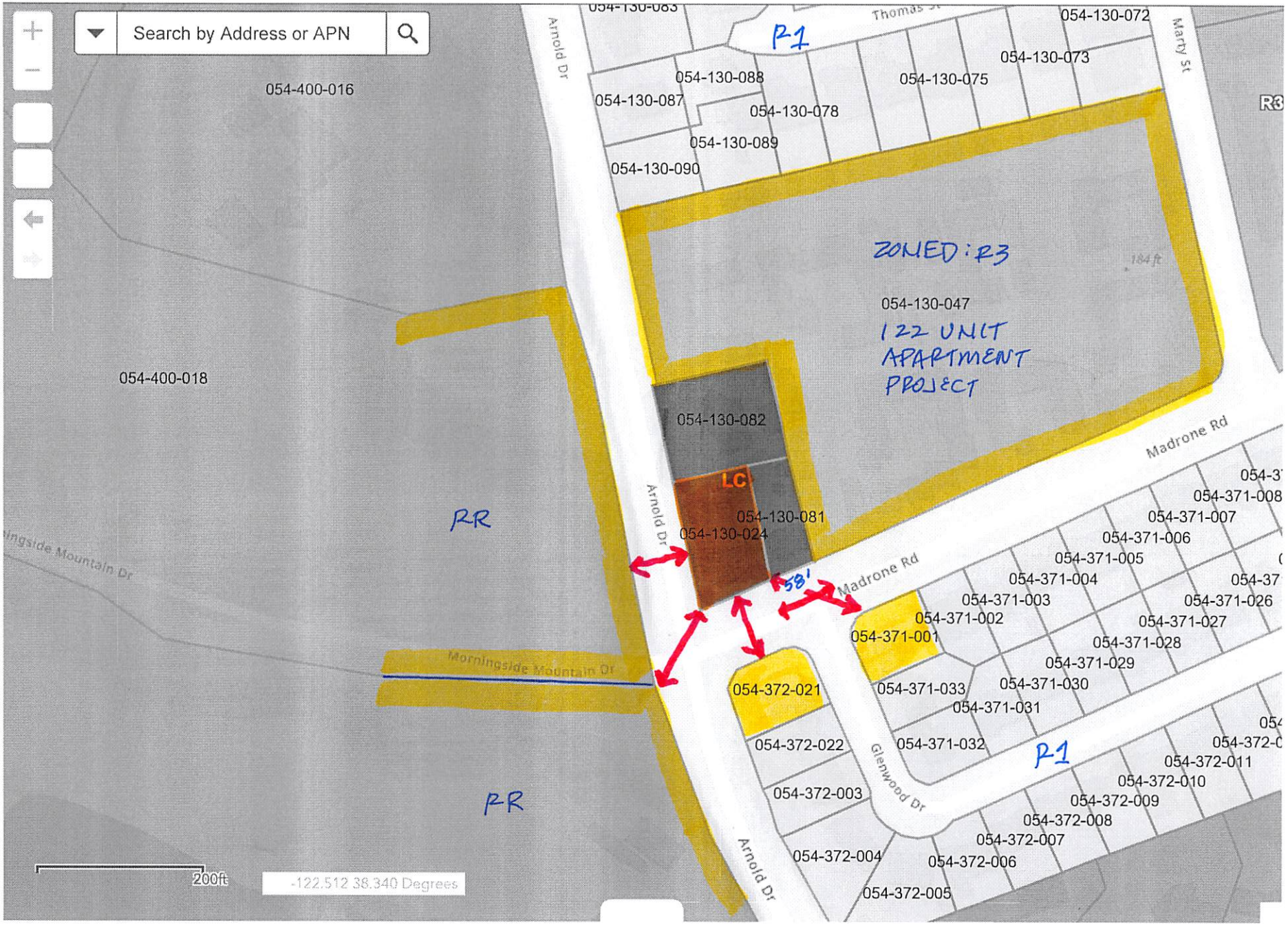
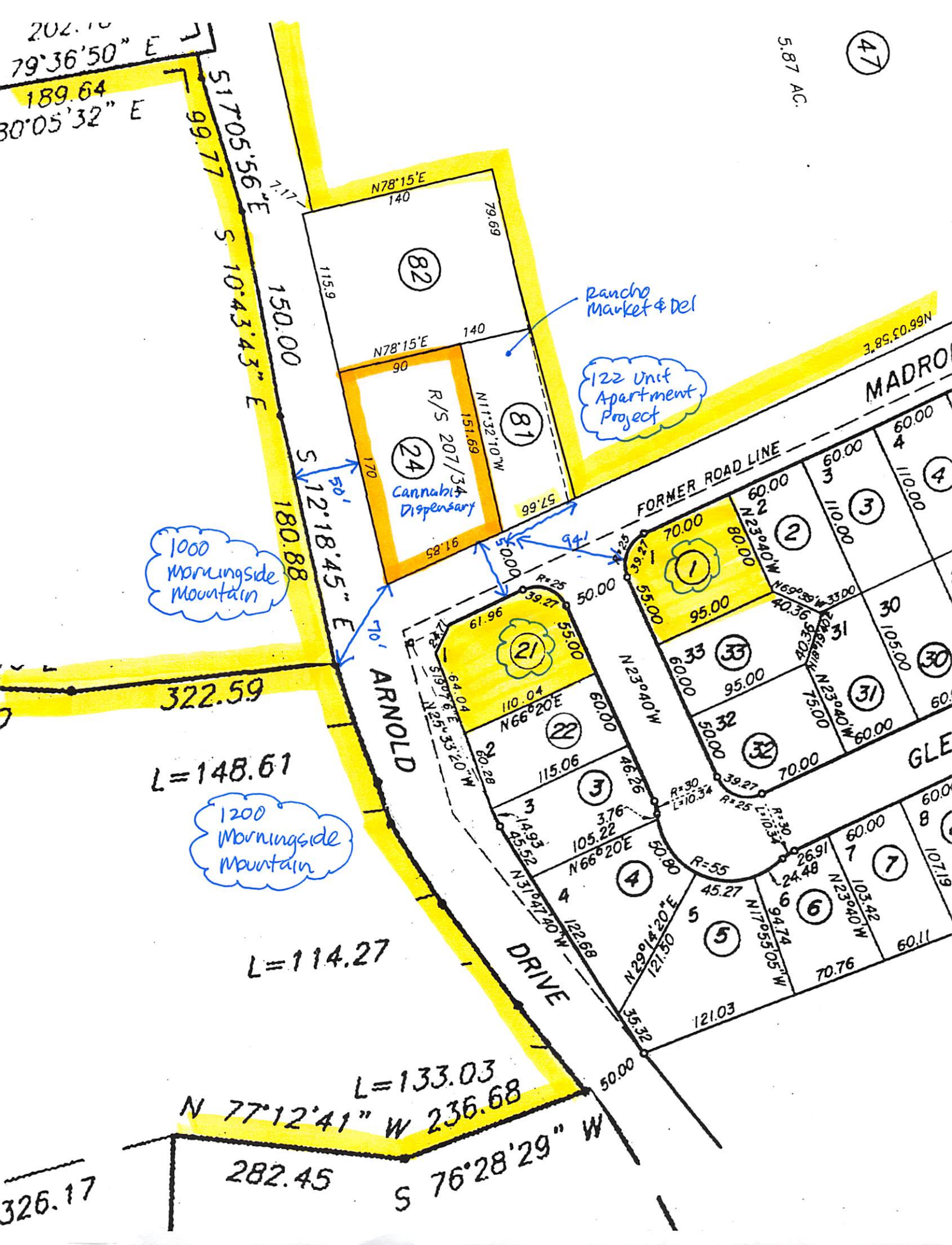
Hi Crystal, please include this map with the information available for the commissioners to be able to see it.
Thanks,
Paul Morrison

permit SONOMA GIS **Zoning and Land Use** Sonoma County

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S 30°05'32" E
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N 77°12'41" W 236.68
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S 76°28'29" W
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5.87 AC.
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64.04
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70.76
121.03
35.32
26.91
24.48
50.00

Figure 2. Aerial Map

15499 Arnold Drive, Glen Ellen
UPC17-0094 Loe Firehouse Dispensary

Figure 2.
Aerial Map

March 15, 2021

Crystal Acker, M.S.
Planner III
County of Sonoma
PRMD - Planning Division | Project Review
2550 Ventura Avenue, Santa Rosa, CA 95403

Letter sent via email – Crystal.Acker@sonoma-county.org

Re: Loe Firehouse 3,847 square foot Cannabis Dispensary, 15499 Arnold Drive, Glen Ellen
Sonoma File No. UPC17-0094

Dear Ms. Acker,

The scheduled Board of Zoning Adjustment hearing on April 8, 2021 should DISAPPROVE a Negative Declaration for CEQA approval of the above project for two major reasons:

First, the Negative Declaration is highly flawed in its consideration of traffic and parking at this facility, given the applicants projected rates of trips and visits (see page 2 of the January 4, 2021 W-Trans Traffic Study) and prejudicial in its failure to consider the astounding projected increase over current usage.

- Daily Trips for this proposed facility increase from 38 trips to 301, **a 792% increase**.
- Peak Hour Weekday AM Trips increase from 4 to 21, **a 525% increase.**
- Peak Hour Weekday PM Trips increase from 6 to 42, **a 700% increase**.
- Peak Hour Weekend PM Trips increase from 2 to 70, **an unheard of 3500% increase**.

The traffic impacts from only 12 guest parking spaces will also be astounding and permanently detrimental to this residential neighborhood. There is no calculation made of the average time spent in the store by a customer evaluating possible purchases and completing necessary requirements for a transaction. Assuming an average of 30 minutes, this means that on a weekday there will be at least 12 cars per hour trying to find spaces on Madrone Road or Marty Way, since no near parking on Arnold Drive is available. This increases to at least 44 cars per hour at peak times on weekend trying to park in a very small residential area, where street parking is already occupied by local residents. It is incomprehensible that this impact has not been considered, or that it is considered to meet the May 2016 Traffic Operation Standard that "parking demand is accommodated." Further, see below – the proposed Project does not provide the required parking per the Sonoma County Municipal Code.

Second, the Application is in direct violation of the Sonoma County Municipal Code on two counts:

1. **100 FOOT RESIDENTIAL SETBACK.** A cannabis dispensary must be at least 100 feet from a residentially zoned property unless a "physical separation" exists between land uses or parcels such that no offsite impacts could occur. **Five residential properties are within 100 feet of the proposed dispensary.** No physical separation of any kind exists between these five residential parcels and the proposed cannabis dispensary. PRMD initially stated to the community that "a public street" represents physical separation. A "public street" is actually the direct opposite of "physical separation" – it is "public access". When it was pointed out to

PRMD that the 121-unit apartment project is 57 feet from **the dispensary location – and not separated by a "public street"** - PRMD then opined in **June 2018 that the market/burrito store** in between the two properties represented "physical separation" **even though you can** walk directly on Madrone Road from one property to the other. **These arguments make no** sense and clearly do not meet the intent of the Sonoma County Code **of Ordinances. Fortunately,** in the 2018 approved Cannabis Cultivation Ordinance Resolution **18-003, the County** has now defined physical separation as follows in Sections 26-88-254 f (6) and f (8): *"Physical equivalent separation exists due to topography, vegetation or slope."* That is now the County standard for the term "physical separation". There is no topography, vegetation or slope between the proposed cannabis dispensary and the five residential properties. **The "Environmental Pollution Solutions December 21, 2019" memorandum is highly flawed and under their assumptions, every property in Sonoma County would qualify as allowable for a cannabis dispensary within 100 feet of a residential property.**

2. **INSUFFICIENT PARKING**. The Applicant has proposed 17 spaces on their site plan but one space does not meet County Code. PRMD has confirmed that that the cannabis dispensary is legally only providing 16 parking spaces. **The applicant has calculated the parking code incorrectly and is attempting to only calculate parking on the front retail portion of the facility.** The applicant has arbitrarily not allocated any parking requirements to the remaining 1,956 square feet of their space – which is not how the code calculates parking. This dispensary application is for 3,847 square feet. The parking calculation is 100% clear per Sonoma County Code 26-88-010 which states: *"Required Parking. All uses permitted in Chapter 26 of the Sonoma County Code shall provide parking according to the following formulas:..."* For a Medical Cannabis Dispensary, the required parking is *"2 spaces, including at least 1 van-accessible space; plus 1 additional space for every 200 square feet of* ***gross floor area****, plus 1 additional space for each employee on maximum shift; but in no case less than 5 off-street parking spaces".* **It clearly says parking must be calculated on the "gross floor area".** There is no carveout for any non-retail space within a medical cannabis dispensary business. **Therefore, this use requires 2 + 20 + 5 = 27 spaces.** That is equivalent to a 7.02 space per 1000 square foot ratio. The property can only accommodate 16 spaces – **therefore it is 69% under parked.** The application also does not meet the minimum employee parking requirement of 5 spaces (they are only providing 4 spaces).

There are other troubling issues such as adjacency to a bus stop across the street used by numerous families and children, and an inevitable increase in crime issues.

These major environmental and code violation issues should have PRMD terminating this application immediately. This letter is not written in opposition to cannabis dispensaries which are allowed by the Sonoma County Municipal Code. This letter is IN OPPOSITION to allowing a cannabis dispensary in a 99.9% zoned residential neighborhood with many families and hundreds of children and which is in violation of the Sonoma County Municipal Code.

Sincerely, Lilly M Mugele

Name LILLY M. MUGELE

Address 15420 WOODSIDE CT.
GLEN ELLEN CA 95442

March 15, 2021

Crystal Acker, M.S.
Planner III
County of Sonoma
PRMD - Planning Division | Project Review
2550 Ventura Avenue, Santa Rosa, CA 95403

Letter sent via email – Crystal.Acker@sonoma-county.org

Re: Loe Firehouse 3,847 square foot Cannabis Dispensary, 15499 Arnold Drive, Glen Ellen
Sonoma File No. UPC17-0094

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Sincerely,

G Mugele

Name G. MUGELE

Address 15420 WOODSIDE
GLEN ELLEN, CA

March 15, 2021

Crystal Acker, M.S. *Letter sent via email – Crystal.Acker@sonoma-county.org*
Planner III
County of Sonoma
PRMD - Planning Division | Project Review
2550 Ventura Avenue, Santa Rosa, CA 95403

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Sonoma File No. UPC17-0094

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Sincerely,

Nila Plexico

Name Nila Plexico
Address 932 Madrone Rd.
Sonoma Ca 95476

March 15, 2021

Crystal Acker, M.S. *Letter sent via email – Crystal.Acker@sonoma-county.org*
Planner III
County of Sonoma
PRMD - Planning Division | Project Review
2550 Ventura Avenue, Santa Rosa, CA 95403

Re: Loe Firehouse 3,847 square foot Cannabis Dispensary, 15499 Arnold Drive, Glen Ellen
Sonoma File No. UPC17-0094

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Sincerely,

Name Christopher Plexico
Address 932 Madrone Rd.
Sonoma, Ca 95476

Jim Shere

PO Box 2108, Glen Ellen CA 945442 • jshere@sonic.net • www.jimshere.com • 707/935-3663

April 5, 2021

To Whom It May Concern—

This letter is being written in support of the cannabis dispensary planned for the corner of Arnold Drive and Madrone Road in Glen Ellen. I've attended a presentation by the principles and have read their literature, and I am satisfied that they have gone to great lengths to address and account for every concern that has been raised by the public.

It seems the chief complaint is the potential for increased criminal activity in the neighborhood; however, I do not assume or expect that to happen. A recent study published in *Regional Science and Urban Economics* concluded that "an additional dispensary in a neighborhood leads to a reduction of 17 crimes per month per 10,000 residents, which corresponds to roughly a 19 percent decline relative to the average crime rate over the sample period."

Over the past three years the principles have worked hard to meet and comply with the requirements of this highly regulated industry. I believe it is now time to allow them to open for business.

March 15, 2021

Crystal Acker, M.S.
Planner III
County of Sonoma
PRMD - Planning Division | Project Review
2550 Ventura Avenue, Santa Rosa, CA 95403

Letter sent via email – Crystal.Acker@sonoma-county.org

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Maria Spradlin

Name

Address 10716 Sonoma Glen Ct.
Glen Ellen, CA 95442

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Sincerely,

Name Jonathan Taylor
Address 893 Glenwood. Dr.
Sonoma, CA. 95476

NOTICE OF INTENT TO ADOPT A NEGETIVE DECLARATION PURSUANT TO THE CALIFIRNIA ENVIROMENTAL QUALITY ACT FOR A CANNABIS DISPENSARY USE PERMIT

Expanded Initial Study
File # UPC 17-0094

Opposition Issues & Facts Against Dispensary Location

- 150 Patrons per day
- Parking spaces - 12 Public - 5 Employee
- Corner bus stop for Sonoma Valley Transit and local school bus
- Sonoma Valley Citizen Advisory Commission May 23, 2018 voted not to recommend this project for approval.
- During this meeting on May 23, 2018 Mr. Labro (applicant for cannabis dispensary at Madrone and Arnold Dr.) addressing another Use Permit Applicant became so outrage the entire Commission had to declare a recess and all commissioners had to leave the room.
- Because previous comments, letters, petitions and signatures apposing this project were not in response to a formal public review period or County action, they were simply registered to the project file.
- Most recent public notification was distributed in February 2021 was to only 300 residence within 1000' ($1/5^{th}$ of a mile) of the parcel located at 15499 Arnold Dr. Glen Ellen.
- Many times, the following statement is mentioned throughout this study, "There are no operating dispensaries in Sonoma Valley area or in the City of Sonoma"
- August 18, 2020 article in Sonoma Index Tribune Sparc cannabis company will receive Sonoma's lone business license to operate a storefront dispensary in the city limits located at 19315 Sonoma Highway (Previously Mexican restaurant next to Lucky's shopping Center). The dispensary has been approved for operation in 2021 and will be staffed by 15 to 20 employees.
- The state required double-locked entrance, additional lighting, additional security fencing and/or gates is not mentioned in study.
- Cannabis dispensaries odors can occur from such facilities if not properly managed.
- Zoning had been previously changed to limited commercial only to accommodate a firehouse request, not for a cannabis dispensary.
- Sonoma County will not allow a cannabis dispensary within a 1,000' of a park. Strong consideration should be given to the fact that Moran-Goodman Park 980 Sonoma Glen Circle is 1,001' from project.

Traffic Impact Study for the Apothevert Dispensary July 24, 2018

- This study indicates a "left-turn lane is not warranted on Arnold Drive or Madrone Road at the project entrance". This will be a very unsafe situation.
- **Traffic Impact Study Dated July 24, 2018. County of Sonoma Guidelines for Traffic Studies will only be acceptable if it is less than two years old.**

March 15, 2021

Crystal Acker, M.S. *Letter sent via email – Crystal.Acker@sonomacounty.org*
Planner III
County of Sonoma
PRMD - Planning Division | Project Review
2550 Ventura Avenue, Santa Rosa, CA 95403

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Sincerely, Casey Trantow

CASEY TRANTOW

Name

Address 1064 SONOMA GLEN CIRCLE

GLEN ELLEN, CA. 95442

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PRMD that the 121-unit apartment project is 57 feet from the dispensary location – **and not separated by a "public street"** - PRMD then opined in June 2018 that the market/burrito store in between the two properties represented "physical separation" even though you can walk directly on Madrone Road from one property to the other. These arguments make no sense and clearly do not meet the intent of the Sonoma County Code of Ordinances. Fortunately, in the 2018 approved Cannabis Cultivation Ordinance Resolution 18-003, the County has now defined physical separation as follows in Sections 26-88-254 f (6) and f (8): *"Physical equivalent separation exists due to topography, vegetation or slope."* That is now the County standard for the term "physical separation". There is no topography, vegetation or slope between the proposed cannabis dispensary and the five residential properties. **The "Environmental Pollution Solutions December 21, 2019" memorandum is highly flawed and under their assumptions, every property in Sonoma County would qualify as allowable for a cannabis dispensary within 100 feet of a residential property.**

2. **INSUFFICIENT PARKING**. The Applicant has proposed 17 spaces on their site plan but one space does not meet County Code. PRMD has confirmed that that the cannabis dispensary is legally only providing 16 parking spaces. **The applicant has calculated the parking code incorrectly and is attempting to only calculate parking on the front retail portion of the facility.** The applicant has arbitrarily not allocated any parking requirements to the remaining 1,956 square feet of their space – which is not how the code calculates parking. This dispensary application is for 3,847 square feet. The parking calculation is 100% clear per Sonoma County Code 26-88-010 which states: *"Required Parking. All uses permitted in Chapter 26 of the Sonoma County Code shall provide parking according to the following formulas:..."* For a Medical Cannabis Dispensary, the required parking is *"2 spaces, including at least 1 van-accessible space; plus 1 additional space for every 200 square feet of* ***gross floor area****, plus 1 additional space for each employee on maximum shift; but in no case less than 5 off-street parking spaces"*. **It clearly says parking must be calculated on the "gross floor area"**. There is no carveout for any non-retail space within a medical cannabis dispensary business. **Therefore, this use requires 2 + 20 + 5 = 27 spaces.** That is equivalent to a 7.02 space per 1000 square foot ratio. The property can only accommodate 16 spaces – **therefore it is 69% under parked.** The application also does not meet the minimum employee parking requirement of 5 spaces (they are only providing 4 spaces).

There are other troubling issues such as adjacency to a bus stop across the street used by numerous families and children, and an inevitable increase in crime issues.

These major environmental and code violation issues should have PRMD terminating this application immediately. This letter is not written in opposition to cannabis dispensaries which are allowed by the Sonoma County Municipal Code. This letter is IN OPPOSITION to allowing a cannabis dispensary in a 99.9% zoned residential neighborhood with many families and hundreds of children and which is in violation of the Sonoma County Municipal Code.

Sincerely, Debi Trantow

Name DEBI TRANTOW
Address 1064 SONOMA GLEN CIRCLE
GLEN ELLEN, CA.
95442

March 15, 2021

Crystal Acker, M.S. ***Letter sent via email – Crystal.Acker@sonoma-county.org***
Planner III
County of Sonoma
PRMD - Planning Division | Project Review
2550 Ventura Avenue, Santa Rosa, CA 95403

Re: Loe Firehouse 3,847 square foot Cannabis Dispensary, 15499 Arnold Drive, Glen Ellen
Sonoma File No. UPC17-0094

Dear Ms. Acker,

The scheduled Board of Zoning Adjustment hearing on April 8, 2021 should DISAPPROVE a Negative Declaration for CEQA approval of the above project for two major reasons:

First, the Negative Declaration is highly flawed in its consideration of traffic and parking at this facility, given the applicants projected rates of trips and visits (see page 2 of the January 4, 2021 W-Trans Traffic Study) and prejudicial in its failure to consider the astounding projected increase over current usage.

- Daily Trips for this proposed facility increase from 38 trips to 301, **a 792% increase**.
- Peak Hour Weekday AM Trips increase from 4 to 21, **a 525% increase.**
- Peak Hour Weekday PM Trips increase from 6 to 42, **a 700% increase**.
- Peak Hour Weekend PM Trips increase from 2 to 70, **an unheard of 3500% increase**.

The traffic impacts from only 12 guest parking spaces will also be astounding and permanently detrimental to this residential neighborhood. There is no calculation made of the average time spent in the store by a customer evaluating possible purchases and completing necessary requirements for a transaction. Assuming an average of 30 minutes, this means that on a weekday there will be at least 12 cars per hour trying to find spaces on Madrone Road or Marty Way, since no near parking on Arnold Drive is available. This increases to at least 44 cars per hour at peak times on weekend trying to park in a very small residential area, where street parking is already occupied by local residents. It is incomprehensible that this impact has not been considered, or that it is considered to meet the May 2016 Traffic Operation Standard that "parking demand is accommodated." Further, see below – the proposed Project does not provide the required parking per the Sonoma County Municipal Code.

Second, the Application is in direct violation of the Sonoma County Municipal Code on two counts:

1. **100 FOOT RESIDENTIAL SETBACK.** A cannabis dispensary must be at least 100 feet from a residentially zoned property unless a "physical separation" exists between land uses or parcels such that no offsite impacts could occur. **Five residential properties are within 100 feet of the proposed dispensary.** No physical separation of any kind exists between these five residential parcels and the proposed cannabis dispensary. PRMD initially stated to the community that "a public street" represents physical separation. A "public street" is actually the direct opposite of "physical separation" – it is "public access". When it was pointed out to

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Sincerely,

Name Tim Warren / Towi Marion

Address 948 Madrone Rd.
Sonoma, CA. 95476