

Cannabis Ordinance Multi-Tenant Urgency Moratorium  
Public Comment  
Received  
August 28, 2021 through September 13, 2021

**From:** [Lisa Lai](#)  
**To:** [Crystal Acker](#); [Scott Orr](#); [Andrew Smith](#); [Tennis Wick](#); [BOS](#)  
**Subject:** Fwd: FW: [FMWW] PLEASE FILL OUT SURVEY! Sonoma County Cannabis Updates  
**Date:** Saturday, August 28, 2021 8:16:34 PM  
**Attachments:** [ATT00001.txt](#)

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## EXTERNAL

Is the board considering a moratorium on new permits until the EIR is done?

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

**From:** Patrick Bransford <[pat@patbransford.com](mailto:pat@patbransford.com)>  
**Date:** Sat, Aug 28, 2021, 7:18 PM  
**Subject:** FW: [FMWW] PLEASE FILL OUT SURVEY! Sonoma County Cannabis Updates  
**To:** Lisa Lai <[allcalilisa@gmail.com](mailto:allcalilisa@gmail.com)>, [sica@sonic.net](mailto:sica@sonic.net) <[sica@sonic.net](mailto:sica@sonic.net)>

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**From:** Friends\_of\_Mark\_West\_Watershed <[friends\\_of\\_mark\\_west\\_watershed-bounces+pat@patbransford.com@lists.sonic.net](mailto:friends_of_mark_west_watershed-bounces+pat@patbransford.com@lists.sonic.net)> **On Behalf Of** Ms. Harriet Buckwalter  
**Sent:** Saturday, August 28, 2021 8:38 AM  
**To:** FMWW <[friends\\_of\\_mark\\_west\\_watershed@lists.sonic.net](mailto:friends_of_mark_west_watershed@lists.sonic.net)>  
**Subject:** [FMWW] PLEASE FILL OUT SURVEY! Sonoma County Cannabis Updates

As part of the visioning sessions to create the framework for the Environmental Impact Report (EIR), the county is sending out this survey. Please take a few minutes (24 questions) to fill it out. Numbers count!

Please note that the county now has tentatively listed for Sept 21st Board agenda the question of a moratorium on cannabis permitting until the EIR is completed. This is something FMWW has asked them to do, so if you are in favor as well, **please be sure to answer the questions related to a moratorium.**

The survey closes on September 6th. The Cannabis team will be submitting the results of this survey to the Board on September 28th. We presume they will use the survey results on the moratorium questions for the meeting on the 21st.

TAKE THE SURVEY HERE:

The [Countywide Cannabis Visioning Survey](#) is open now through Monday, September 6.

Thanks for your support!

Harriet

Begin forwarded message:

**From:** "Sonoma County, CA" <[casonoma@public.govdelivery.com](mailto:casonoma@public.govdelivery.com)>  
**Subject:** Sonoma County Cannabis Updates  
**Date:** August 27, 2021 at 8:30:54 PM PDT  
**To:** [hbuck@sonic.net](mailto:hbuck@sonic.net)  
**Reply-To:** [casonoma@public.govdelivery.com](mailto:casonoma@public.govdelivery.com)

## Sonoma County Cannabis Program

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

County staff has created a survey to inform development of a draft framework for the new cannabis ordinance.

The [Countywide Cannabis Visioning Survey](#) is open now through Monday, September 6.

For more information, visit the Comprehensive Cannabis Program Update & EIR webpage:  
<https://sonomacounty.ca.gov/Cannabis/Comprehensive-Cannabis-Program-Update-and-Environmental-Impact-Report/>



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This email was sent to [hbuck@sonic.net](mailto:hbuck@sonic.net) using GovDelivery Communications Cloud on behalf of: Sonoma County, CA · 575 Administration Drive · Santa Rosa, CA 95403



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**From:** [avery.averysconcrete.com](mailto:avery.averysconcrete.com)  
**To:** [Cannabis](mailto:Cannabis)  
**Subject:** FW: MORITORIUM ON COMMERCIAL CANNABIS CULTIVATION IN SONOMA COUNTY  
**Date:** Monday, September 6, 2021 11:48:30 AM

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**EXTERNAL**

Sent from [Mail](#) for Windows

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**From:** [avery.averysconcrete.com](mailto:avery.averysconcrete.com)  
**Sent:** Monday, September 6, 2021 11:46 AM  
**To:** [cannabis@sonoma-county.org](mailto:cannabis@sonoma-county.org)  
**Subject:** RE: MORITORIUM ON COMMERCIAL CANNABIS CULTIVATION IN SONOMA COUNTY

Dear Supervisors:

We represent the community of Bloomfield who are trying to preserve what makes Sonoma County special: our scenic beauty and precious natural resources. The solution County wide is small cannabis grows away from residences, not in public view and not spreading noise or odor.

In Bloomfield we specifically want to protect our four hundred and forty residents' health, safety and welfare and quality of life from commercial cannabis cultivation adjacent to multiple backyards and using our inadequate residential streets for access.

On May 18, 2021 the County Supervisors denied a Subsequent Mitigated Negative Declaration and Cannabis Ordinance and have initiated a process to prepare a comprehensive Environmental Impact Report.

The preparation and completion of the Environmental Impact Report and the resulting Commercial Cannabis Cultivation Ordinance is estimated for public hearings in mid-2024.

Publication of the estimated dates for public hearings of the EIR and Cannabis Ordinance to 2024 encouraged an influx of permit applications.

Commercial Cannabis Cultivation applications submitted during this multi year interim period would be reviewed under an existing ordinance and environmental documents that are insufficient and lacking in environmental and health, safety and welfare considerations.

In addition, the Sonoma County General Plan is over twenty years old and does not provide adequate or comprehensive land use policies for current conditions. The Petaluma Dairy Belt area Plan was prepared thirty-six years ago and modified over thirteen years ago. Cannabis was not considered in this plan.

The State of California has declared a Drought Emergency in Sonoma County due to a severe water shortage and lack of precipitation

Allowing continued Commercial Cannabis Cultivation has the following specific potential ramifications:

\*Inadequate existing setbacks from rural residential neighborhoods and unincorporated towns that do not protect the health, safety and welfare of rural residents.

\*Proliferation and over concentration of commercial cannabis cultivation in the Dairy Belt area of Sonoma County. A large cannabis grow recently appeared at the Neve Bros property to the east of Bloomfield in the same watershed as Bloomfield with 67 existing wells. There is an 80,000 sf proposal adjacent to multiple backyards in Bloomfield and a well being drilled over the last three days. There are also existing grows west and south of Bloomfield in the Dairy Belt.

\*Diminished air quality and lack of information adequately analyzing odor emissions as they relate to public health impacts and mitigation measures

\*Inadequate existing analysis and mitigation of impacts on  
groundwater supply

Loss of Farmlands

aesthetic impacts

Wildfire safety and emergency access/evacuation

Climate change and the resulting impacts on fire hazards

Replacing open space lands with cannabis cultivation and processing

Emergency response and evacuations

Traffic impacts and increase in Vehicle Miles Travelled

Greenhouse Gas Emissions

Energy Use, Wildfire safety and utility services

New or Expanded electric distribution facilities

Noise impacts

\*The California Environmental Quality Act prohibits an agency from piecemeal development or “chopping up” a large project into many smaller ones each of which might individually have minimal environmental consequences but collectively create significant environmental impacts. This is what is occurring in Sonoma County and has not been addressed. The submittal adjacent to Bloomfield for eight individual applications of 10,000 sf each has a cumulative total of 80,000 sf. An example of this loophole. These applications have been submitted for ministerial processing without environmental review or hearings.

\*The Supervisors’ comments have indicated the Board is in sympathy with small growers and bringing illegal grows into the mainstream to establish viable legal businesses. The EIR and ordinance development now underway are the tools needed to determine suitable sites for cannabis and how protections are provided to rural residents and all the other valuable resources in the County.

Given that the County has already approved Commercial Cannabis Cultivation on narrow substandard roads an additional influx creates unsafe conditions for safe evacuation as well

as impeding access for fire fighters and first responder during a fire and,

Given that the County has already approved a well permit and the well drilling is under way for eight applications submitted to the Ag Commissioner for proposed ministerial permitting of a 80,000 sf commercial cannabis cultivation project in Bloomfield where a biotic study was initially required and the scope of the project was originally deemed to require a Conditional Use Permit

We the undersigned, request the Board of Supervisors immediately institute a

**A Countywide moratorium on Commercial Cannabis Cultivation. A moratorium on new and pipeline projects is imperative to protect the public health safety and welfare, to preserve the vanishing precious water resources and to protect natural environmental resources Sonoma County is known for until the Environmental Impact Report and new cannabis ordinance is adopted and in place.**

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**From:** [Crystal Acker](#)  
**To:** [Cannabis](#)  
**Subject:** FW: What's This About a Possible Cannabis Urgency Moratorium?  
**Date:** Tuesday, September 7, 2021 6:43:50 AM  
**Attachments:** [image001.png](#)  
[image002.png](#)  
[image003.png](#)  
[image006.png](#)

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**Crystal Acker, M.S.**

Supervising Planner

[www.PermitSonoma.org](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](http://PermitSonoma.org).*

*The Permit Center has reopened with limited capacity Monday, Tuesday, Thursday, Friday from 9:00 AM – 4:00 PM and Wednesday, 10:30 AM – 4:00 PM.*

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

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**From:** Lauren Mendelsohn <lauren@omarfigueroa.com>  
**Sent:** September 06, 2021 2:22 PM  
**To:** Crystal Acker <Crystal.Acker@sonoma-county.org>; Scott Orr <Scott.Orr@sonoma-county.org>  
**Cc:** Lynda Hopkins <Lynda.Hopkins@sonoma-county.org>; district5 <district5@sonoma-county.org>  
**Subject:** What's This About a Possible Cannabis Urgency Moratorium?

**EXTERNAL**

Hi Crystal and Scott (with CC to Supervisor Hopkins),

I was a bit shocked to see that the Board of Supervisors will be hearing an agenda item about a possible urgency moratorium on cannabis permitting on 9/21 with a discussion about an extension of said possible moratorium on 10/26. What exactly is being proposed? A moratorium on all new cannabis permitting? Only ministerial permitting? What about renewals, or applications in progress?

What did staff hear that prompted this item to be added to the calendar now? Has staff formulated a recommendation on whatever is being proposed yet?

It seems that the vast majority of concerns about cannabis stem from (a) lack of education and (b) problems with illegal unlicensed grows, neither of which would be solved by enacting a moratorium on permitting.

I request that this be placed on the regular calendar whenever it is heard, not the consent calendar. A moratorium would be a major step backwards for normally-progressive Sonoma County, and local stakeholders must be given a fair chance to provide input before such drastic action is taken.

I look forward to your response. Thank you.

Lauren Mendelsohn  
District 5 Resident & Taxpayer

\*\*\*\*\*



**Lauren A. Mendelsohn, Esq.**  
Senior Associate Attorney  
Law Offices of Omar Figueroa  
7770 Healdsburg Avenue  
Sebastopol, CA 95472-3352  
Tel: (707) 829-0215  
Fax: (707) 827-8538  
[lauren@omarfigueroa.com](mailto:lauren@omarfigueroa.com)  
[www.omarfigueroa.com](http://www.omarfigueroa.com)

***Have you heard about the International Cannabis Bar Association (INCBA)? [Check us out!](#) Use code "Mendelsohn" for 15% off membership and events.***



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**From:** [Erin Holm](#)  
**To:** [BOS](#); [Cannabis](#); [David Rabbitt](#); [Andrea Krout](#); [licensing@cannabis.ca.gov](mailto:licensing@cannabis.ca.gov)  
**Subject:** Close the cannabis permit loop hole!!!  
**Date:** Tuesday, September 7, 2021 3:40:24 PM

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**EXTERNAL**

September 7, 2021

Sonoma County Board of Supervisors

575 Administration Drive, Room 100A

Santa Rosa, CA 95403

RE: MORATORIUM ON COMMERCIAL CANNABIS CULTIVATION IN SONOMA COUNTY

Dear Supervisors:

We represent the community of Bloomfield who are trying to preserve what makes Sonoma County special: our scenic beauty and precious natural resources. The solution County wide is small cannabis grows away from residences, not in public view and not spreading noise or odor.

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insufficient and lacking in environmental and health, safety and welfare considerations.

In addition, the Sonoma County General Plan is over twenty years old and does not provide adequate or comprehensive land use policies for current conditions. The Petaluma Dairy Belt area Plan was prepared thirty-six years ago and modified over thirteen years ago. Cannabis was not considered in this plan.

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\*Diminished air quality and lack of information adequately analyzing odor emissions as they relate to public health impacts and mitigation measures

\*Inadequate existing analysis and mitigation of impacts on groundwater supply

Loss of Farmlands

aesthetic impacts

Wildfire safety and emergency access/evacuation

Climate change and the resulting impacts on fire hazards

Replacing open space lands with cannabis cultivation and processing

Emergency response and evacuations

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Given that the County has already approved a well permit and the well drilling is under way for eight applications submitted to the Ag Commissioner for proposed ministerial permitting of a 80,000 sf commercial cannabis cultivation project in Bloomfield where a biotic study was initially required and the scope of the project was originally deemed to require a Conditional Use Permit

We the undersigned, request the Board of Supervisors immediately institute a

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**From:** [Gretchen Giles](#)  
**To:** [district3](#); [Cannabis](#)  
**Cc:** [Sonoma County Cannabis Coalition](#)  
**Subject:** Proposed Cannabis Moratorium  
**Date:** Tuesday, September 7, 2021 10:39:55 AM

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## EXTERNAL

Dear Supervisor Coursey and Members of the SC Cannabis Team:

This is to express my immense dismay and actual sadness that an "emergency" moratorium on Sonoma County's intensely struggling compliant cannabis community is on the 9/21 BoS docket. Our community has been trying to work with the County in a proactive and professional manner for some four years now. To see the Board poised to take a big step away instead of forward is incredibly disheartening. Moreover, it is the wrong thing for Sonoma County.

With the Board seemingly unwilling to shoulder the burden of its position and clearly direct staff to create a program that works for all, Sonoma County is moving backwards on an important job creator and economic engine when it bows to the ill-informed and semi-hysterical worries of a small, minority, group of NIMBYs and away from the will of the voters (64% of whom approved cannabis legalization) and from the example set by the state of California, which is so bullish on this crop that it has an appellations of origin plan in place to protect and exalt it.

Our compliant cannabis farmers each day lose a reason to stay in the legal marketplace and participate in the burdensome tax system currently in place. Why should they? Even I am at a loss to find a further argument for the licit market when our community leadership balks and falters on this topic at every single turn.

I know I speak for my colleagues when I express my dismay and exhaustion that, after **years** of working with the Board, we had to recently start all over again. I took the recent survey and encouraged my friends and neighbors to do so, too. Every single one of them, and I went far outside of the cannabis world, expressed surprise at how the survey was written and how leading the questions were with a POV that was distinctly anti-cannabis.

I voted for you, Supervisor Coursey, after seeing you in action at a SCGA event and feeling comfortable that you have a reasonable point of view on this legal and beneficial agricultural crop. I'm counting on you to rise to the expectations of your electorate. I look forward to addressing you and your colleagues on 9/21.

Best regards,  
Gretchen Giles  
707.570.7887  
[@gretchengiles](#)  
[hellogretchen.com](#)

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**From:** [Jeffery Matthews](#)  
**To:** [Chris Coursey](#); [Susan Gorin](#); [James Gore](#); [district5](#); [Cannabis](#)  
**Subject:** Cannabis Permit Moratorium  
**Date:** Tuesday, September 7, 2021 3:20:24 PM

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**EXTERNAL**

## **Cannabis Permitting Moratorium**

The Sonoma County Board of Supervisors (BOS) **must** declare a moratorium on Conditional use permits and remove the Department of Agriculture – Weights and Measures from issuing any Ministerial permits until the EIR/CEQA review is completed and a sound business practice has been established for the Bloomfield

The applicants have already proven themselves as bad actors as they have drilled a new well in the last week on the property. Worse yet, approved by a drilling permit issued by the Sonoma County AG Department.

Please note that the last paragraph of the permit application states:

**“Note: Zoning permit must be approved before any work begins.”**

None of these properties have approved cannabis permits.

Clearly the AG Department is unable to manage the permitting process and the applicant has no interest. A moratorium on further cannabis permitting must be issued immediately by the BOS until PRMD can get control of this runaway train.

The well should be pulled and filled with concrete until permitting has been approved and project work can commence.

Jeff Matthews  
Bloomfield CA  
707-795-8785  
9/7/21

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**From:** [nbaylk@aol.com](mailto:nbaylk@aol.com)  
**To:** [Cannabis](#)  
**Subject:** Close the Loophole  
**Date:** Tuesday, September 7, 2021 2:19:16 PM

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## EXTERNAL

September 6, 2021

Sonoma County Board of Supervisors  
575 Administration Drive, Room 100A  
Santa Rosa, CA 95403

### RE: MORATORIUM ON COMMERCIAL CANNABIS CULTIVATION IN SONOMA COUNTY

Dear Supervisors:

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the same watershed as Bloomfield with 67 existing wells. There is an 80,000 sf proposal adjacent to multiple backyards in Bloomfield and a well being drilled over the last three days. There are also existing grows west and south of Bloomfield in the Dairy Belt.

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\*Inadequate existing analysis and mitigation of impacts on  
groundwater supply  
Loss of Farmlands  
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Wildfire safety and emergency access/evacuation  
Climate change and the resulting impacts on fire hazards  
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Greenhouse Gas Emissions  
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Karen Kibler

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**From:** [Virginia Hair](#)  
**To:** [David Rabbitt](#)  
**Cc:** [Andrea Krout](#); [Cannabis](#)  
**Subject:** We would like a Moratorium on All Pending and New Cannabis Permits  
**Date:** Tuesday, September 7, 2021 10:24:48 AM

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## EXTERNAL

September 7, 2021

Sonoma County Board of Supervisors  
575 Administration Drive, Room 100A  
Santa Rosa, CA 95403

### RE: MORATORIUM ON COMMERCIAL CANNABIS CULTIVATION IN SONOMA COUNTY

Dear Supervisors:

I am a resident of the community of Bloomfield and want to preserve what makes Sonoma County special: our scenic beauty and precious natural resources. The solution County wide is small cannabis grows away from residences, not in public view and not spreading noise or odor or depleting our groundwater resources.

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\*Inadequate existing analysis and mitigation of impacts on:

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Loss of Farmlands

Aesthetic impacts

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Replacing open space lands with cannabis cultivation and processing

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Greenhouse Gas Emissions

Energy Use and the capacity of the existing electric grid and utility services

Noise impacts

Light impacts

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needed to determine suitable sites for cannabis and how protections are provided to rural residents and all the other valuable resources in the County.

Given that the County has already approved Commercial Cannabis Cultivation on narrow substandard roads, an additional influx creates unsafe conditions for safe evacuation as well as impeding access for fire fighters and first responder during a fire or emergency.

Given that the County has already approved a well permit and the well drilling is under way for eight applications submitted to the Agriculture Commissioner for proposed ministerial permitting of a 80,000 sf commercial cannabis cultivation project in Bloomfield, where a biotic study was initially required and the scope of the project was originally deemed to require a Conditional Use Permit.

We the undersigned, request the Board of Supervisors immediately institute a:

**A Countywide moratorium on Commercial Cannabis Cultivation. A moratorium on new and pipeline projects is imperative to protect the public health, safety and welfare of the residents of the County; to preserve the vanishing precious water resources; and to protect natural environmental resources Sonoma County is known for, until the Environmental Impact Report and new Cannabis Ordinance is adopted.**

Thank you for your service.  
Sincerely, Virginia Hair

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**From:** [Yarrow Kubrin](#)  
**To:** [Cannabis; district5](#)  
**Subject:** Proposed Cannabis Moratorium  
**Date:** Tuesday, September 7, 2021 5:08:15 PM

---

## EXTERNAL

Dear Supervisor Hoplins and Members of the SC Cannabis Team:

This is to express my immense dismay and actual sadness that an "emergency" moratorium on Sonoma County's intensely struggling compliant cannabis community is on the 9/21 BoS docket. Our community has been trying to work with the County in a proactive and professional manner for some four years now. To see the Board poised to take a big step away instead of forward is incredibly disheartening. Moreover, it is the wrong thing for Sonoma County.

With the Board seemingly unwilling to shoulder the burden of its position and clearly direct staff to create a program that works for all, Sonoma County is moving backwards on an important job creator and economic engine when it bows to the ill-informed and semi-hysterical worries of a small, minority, group of NIMBYs and away from the will of the voters (64% of whom approved cannabis legalization) and from the example set by the state of California, which is so bullish on this crop that it has an appellations of origin plan in place to protect and exalt it.

Our compliant cannabis farmers each day lose a reason to stay in the legal marketplace and participate in the burdensome tax system currently in place. Why should they? Even I am at a loss to find a further argument for the licit market when our community leadership balks and falters on this topic at every single turn.

I know I speak for my colleagues when I express my dismay and exhaustion that, after **years** of working with the Board, we had to recently start all over again. I took the recent survey and encouraged my friends and neighbors to do so, too. Every single one of them, and I went far outside of the cannabis world, expressed surprise at how the survey was written and how leading the questions were with a POV that was distinctly anti-cannabis.

I voted for you, Supervisor Hopkins, after seeing you in action at a SCGA event and feeling comfortable that you have a reasonable point of view on this legal and beneficial agricultural crop. I'm counting on you to rise to the expectations of your electorate.

Best,

Yarrow L. Kubrin  
Special Teams Consulting, Principal  
Vice-Chair of the National Cannabis Industry Association's Diversity, Equity & Inclusion Committee (DEIC)  
707-292-8400 mobile  
[specialteamsconsulting@gmail.com](mailto:specialteamsconsulting@gmail.com)

[LinkedIn](#)

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**From:** [Jeremy Strawn](#)  
**To:** [BOS](#); [Cannabis](#); [David Rabbitt](#); [Andrea Krout](#); [licensing@cannabis.ca.gov](mailto:licensing@cannabis.ca.gov)  
**Subject:** Close the Loophole- Vote Yes on a Moratorium  
**Date:** Wednesday, September 8, 2021 12:10:45 AM

---

## EXTERNAL

September 7, 2021

Sonoma County Board of Supervisors  
575 Administration Drive, Room 100A  
Santa Rosa, CA 95403

### RE: MORATORIUM ON COMMERCIAL CANNABIS CULTIVATION IN SONOMA COUNTY

Dear Supervisors:

We represent the community of Bloomfield who are trying to preserve what makes Sonoma County special: our scenic beauty and precious natural resources. The solution County wide is small cannabis grows away from residences, not in public view and not spreading noise or odor.

In Bloomfield we specifically want to protect our four hundred and forty residents' health, safety and welfare and quality of life from commercial cannabis cultivation adjacent to multiple backyards and using our inadequate residential streets for access.

On May 18, 2021 the County Supervisors denied a Subsequent Mitigated Negative Declaration and Cannabis Ordinance and have initiated a process to prepare a comprehensive Environmental Impact Report.

The preparation and completion of the Environmental Impact Report and the resulting Commercial Cannabis Cultivation Ordinance is estimated for public hearings in mid-2024.

Publication of the estimated dates for public hearings of the EIR and Cannabis Ordinance to 2024 encouraged an influx of permit applications.

Commercial Cannabis Cultivation applications submitted during this multi year interim period would be reviewed under an existing ordinance and environmental documents that are insufficient and lacking in environmental and health, safety and welfare considerations.

In addition, the Sonoma County General Plan is over twenty years old and does not provide adequate or comprehensive land use policies for current conditions. The Petaluma Dairy Belt area Plan was prepared thirty-six years ago and modified over

thirteen years ago. Cannabis was not considered in this plan.

The State of California has declared a Drought Emergency in Sonoma County due to a severe water shortage and lack of precipitation.

Allowing continued Commercial Cannabis Cultivation has the following specific potential ramifications:

- \*Inadequate existing setbacks from rural residential neighborhoods and unincorporated towns that do not protect the health, safety and welfare of rural residents.

- \*Proliferation and over concentration of commercial cannabis cultivation in the Dairy Belt area of Sonoma County. A large cannabis grow recently appeared at the Neve Bros property to the east of Bloomfield in the same watershed as Bloomfield with 67 existing wells. There is an 80,000 sf proposal adjacent to multiple backyards in Bloomfield and a well being drilled over the last three days. There are also existing grows west and south of Bloomfield in the Dairy Belt.

- \*Diminished air quality and lack of information adequately analyzing odor emissions as they relate to public health impacts and mitigation measures

- \*Inadequate existing analysis and mitigation of impacts on groundwater supply

- Loss of Farmlands

- aesthetic impacts

- Wildfire safety and emergency access/evacuation

- Climate change and the resulting impacts on fire hazards

- Replacing open space lands with cannabis cultivation and processing

- Emergency response and evacuations

- Traffic impacts and increase in Vehicle Miles Travelled

- Greenhouse Gas Emissions

- Energy Use, Wildfire safety and utility services

- New or Expanded electric distribution facilities

- Noise impacts

- \*The California Environmental Quality Act prohibits an agency from piecemeal development or “chopping up” a large project into many smaller ones each of which might individually have minimal environmental consequences but collectively create significant environmental impacts. This is what is occurring in Sonoma County and has not been addressed. The submittal adjacent to Bloomfield for eight individual applications of 10,000 sf each has a cumulative total of 80,000 sf. An example of this loophole. These applications have been submitted for ministerial processing without environmental review or hearings.

- \*The Supervisors’ comments have indicated the Board is in sympathy with small growers and bringing illegal grows into the mainstream to establish viable legal businesses. The EIR and ordinance development now underway are the tools needed

to determine suitable sites for cannabis and how protections are provided to rural residents and all the other valuable resources in the County.

Given that the County has already approved Commercial Cannabis Cultivation on narrow substandard roads an additional influx creates unsafe conditions for safe evacuation as well as impeding access for fire fighters and first responder during a fire and,

Given that the County has already approved a well permit and the well drilling is under way for eight applications submitted to the Ag Commissioner for proposed ministerial permitting of a 80,000 sf commercial cannabis cultivation project in Bloomfield where a biotic study was initially required and the scope of the project was originally deemed to require a Conditional Use Permit

We the undersigned, request the Board of Supervisors immediately institute a

**A Countywide moratorium on Commercial Cannabis Cultivation. A moratorium on new and pipeline projects is imperative to protect the public health safety and welfare, to preserve the vanishing precious water resources and to protect natural environmental resources Sonoma County is known for until the Environmental Impact Report and new cannabis ordinance is adopted and in place.**

Thank You,

Jeremy Strawn  
Bloomfield Resident

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**From:** [Valorie Dallas](#)  
**To:** [Cannabis](#)  
**Subject:** Fwd: MORATORIUM ON ALL COMMERCIAL CANNABIS CULTIVATION IN SONOMA COUNTY  
**Date:** Wednesday, September 8, 2021 6:17:33 PM

---

**EXTERNAL**

September 9, 2021

Sonoma County Board of Supervisors  
575 Administration Drive, Room 100A  
Santa Rosa, CA 95403

RE: MORATORIUM ON ALL COMMERCIAL CANNABIS CULTIVATION IN SONOMA COUNTY

Dear Supervisors:

I live in Bloomfield and have been participating in the County's path of figuring out cannabis farming in Sonoma County since a cannabis grow proposal came into my backyard last year.

While I have seen some locations that seem better suited for a cannabis operation, such as Neve on Roblar Rd., Bloomfield is not the place for even a 10,000 sq foot grow, let alone numerous such grows. Our four hundred and forty residents' health, safety and welfare and quality of life would be greatly degraded from commercial cannabis cultivation adjacent to 8 backyards and our public graveyard.

I am greatly concerned with the increase of ministerial permits approved this year. I see our growers in Bloomfield attempting to use a loophole to bypass fair approval. At this point in time, they have 8 applications, under 8 different LLC's, totally 80,000 sq feet. After their first permit application was submitted at the end of last year, the project was deemed to require a Conditional Use Permit. How can the growers keep applying for ministerial permits with new biotic reports until one or two or three get through? Why haven't we seen their biotic report?

The County has already approved 2 well permits (and the well drilling is under way) for the eight applications submitted to the Ag Commissioner. How did this occur when we were told by the county that once a permit application goes in, no land can be disturbed. These wells are shown as the water source for the proposed cannabis on their permit applications and are for no other use.

I request the Board of Supervisors immediately institute a countywide moratorium on commercial cannabis cultivation, including all ministerial permits until Sonoma County's Environmental Impact Report on cannabis is complete and the new cannabis ordinance is adopted. If nothing else, require a CUP on all permit applications to avoid such loopholes in the system and to include issues like neighborhood compatibility.

Thanks,

Valorie Dallas  
Bloomfield, CA

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**From:** [Charlene Stone](#)  
**To:** [district5](#); [district4](#); [district3](#); [district2](#); [Susan Gorin](#); [Cannabis](#)  
**Subject:** Mortatorium on cannabis permitting  
**Date:** Thursday, September 9, 2021 7:30:49 PM

---

**EXTERNAL**

Dear Sonoma County Officials,

I appreciate that you have a difficult decision to make at the next Board of Supervisors' meeting. I am urging you to vote for a moratorium on any new growth in the county until the EIR is finished. Due to the ongoing drought, Sonoma County is in a crisis with water being in short supply. It is reckless to promote any project that will further deplete our water resources. I am advocating that there also be a halt to any new or renewal of cannabis permits due to this water problem.

Your concern is noted since you are asking the state for a forbearance on any new housing as well. This is a good plan which I support.

Regards,

Charlene Stone  
west county resident

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**From:** [Lori Pascarella](#)  
**To:** [Cannabis](#)  
**Subject:** NO MORATORIUM ON CANNABIS PERMITTING  
**Date:** Thursday, September 9, 2021 10:01:04 AM

---

**EXTERNAL**

Dear Board of Supervisors and Cannabis Advisory Committee,

I am writing to strongly urge you not to consider placing a moratorium on permitting cannabis cultivation sites.

A moratorium is completely counterproductive, and ultimately is a direct insult and threat to the cannabis industry, particularly after the last two years wasted by BOS in updating the cannabis ordinance to only get nowhere.

A moratorium on cannabis permitting will only hurt the local economy by stifling jobs creation and tax revenue creation by the local cannabis industry. Local cannabis is fighting to stay a part of the rapidly growing and highly competitive cannabis industry that will soon be legalized federally and is already legalized in some form in over 50% of states. The local cannabis industry must not continually be hindered by the lack of urgency the county has placed on getting a viable cannabis ordinance in place that mirrors state regulations and looks to the future growth of the cannabis industry.

Jobs, tourism, tax revenues are all at stake. NO on moratorium, YES on urgency to act and get a viable cannabis ordinance in place!

Respectfully,  
Lori Pascarella

--



**Lori Pascarella**  
**Compliance Manager**  
**A** 5355 Skylane Blvd Ste A Santa Rosa, CA 95403  
**P** (707) 529-2378  
**E** [lori@bangodistribution.com](mailto:lori@bangodistribution.com)  
**W** [www.bangodistribution.com](http://www.bangodistribution.com)



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**From:** [Laurie Williams](#)  
**To:** [Cannabis](#)  
**Subject:** Water!  
**Date:** Thursday, September 9, 2021 7:02:49 PM

---

**EXTERNAL**

Dear Sonoma County Officials,

I appreciate that you have a difficult decision to make at the next Board of Supervisors' meeting. I am urging you to vote for a moratorium on any new growth in the county until the EIR is finished. Due to the ongoing drought, Sonoma County is in a crisis with water being in short supply. It is reckless to promote any project that will further deplete our water resources. I am advocating that there also be a halt to any new or renewal of cannabis permits due to this water problem.

Your concern is noted since you are asking the state for a forbearance on any new housing as well. This is a good plan which I support.

Regards,  
Laurie Williams

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**From:** [Robert Field](#)  
**To:** [district2](#); [Cannabis](#)  
**Subject:** Moratorium  
**Date:** Thursday, September 9, 2021 3:53:18 PM

---

**EXTERNAL**

Dear Sonoma County Officials,

I appreciate that you have a difficult decision to make at the next Board of Supervisors' meeting. I am urging you to vote for a moratorium on any new growth in the county until the EIR is finished. Due to the ongoing drought, Sonoma County is in a crisis with water being in short supply. It is reckless to promote any project that will further deplete our water resources. I am advocating that there also be a halt to any new or renewal of cannabis permits due to this water problem, especially since it requires significantly more water.

Your concern is noted since you are asking the state for a forbearance on any new housing as well. This is a good plan which I support.

Regards,

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**From:** [Diana Van Ry](#)  
**To:** [Cannabis](#)  
**Subject:** Moratorium on agricultural projects  
**Date:** Friday, September 10, 2021 6:43:08 AM

---

**EXTERNAL**

Dear Sonoma County Officials,

I appreciate that you have a difficult decision to make at the next Board of Supervisors' meeting. I am urging you to vote for a moratorium on any new growth in the county until the EIR is finished. Due to the ongoing drought, Sonoma County is in a crisis with water being in short supply. It is reckless to promote any project that will further deplete our water resources. I am advocating that there also be a halt to any new or renewal of cannabis permits due to this water problem.

Your concern is noted since you are asking the state for a forbearance on any new housing as well. This is a good plan which I support.

Regards,  
Diana R. Van Ry

Diana Van Ry  
2573 Greenvale Lane  
Santa Rosa, CA 95401  
707-541-6670  
707-799-8113 (c)  
[vantilton@comcast.net](mailto:vantilton@comcast.net)

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**From:** [Linda Gamble](#)  
**To:** [Cannabis](#)  
**Subject:** Vote Yes on a Moratorium  
**Date:** Friday, September 10, 2021 12:15:51 PM

---

**EXTERNAL**

Begin forwarded message:

**From:** Linda Gamble <[gambol@sonic.net](mailto:gambol@sonic.net)>  
**Date:** September 10, 2021 at 12:12:47 PM PDT  
**To:** [bos@sonoma-county.org](mailto:bos@sonoma-county.org)  
**Subject:** Vote Yes on a Moratorium

Sonoma County Board of Supervisors  
575 Administration Drive, Room 100A  
Santa Rosa, CA 95403

RE: MORATORIUM ON COMMERCIAL CANNABIS CULTIVATION IN SONOMA COUNTY

Dear Supervisors:

We represent the community of Bloomfield who are trying to preserve what makes Sonoma County special: our scenic beauty and precious natural resources. The solution County wide is small cannabis grows away from residences, not in public view and not spreading noise or odor.

In Bloomfield we specifically want to protect our four hundred and forty residents' health, safety and welfare and quality of life from commercial cannabis cultivation adjacent to multiple backyards and using our inadequate residential streets for access.

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Publication of the estimated dates for public hearings of the EIR and Cannabis Ordinance to 2024 encouraged an influx of permit applications.

Commercial Cannabis Cultivation applications submitted during this multi year interim period would be reviewed under an existing ordinance and environmental documents that are insufficient and lacking in environmental and health, safety and welfare considerations.

In addition, the Sonoma County General Plan is over twenty years old and does not provide

adequate or comprehensive land use policies for current conditions. The Petaluma Dairy Belt area Plan was prepared thirty-six years ago and modified over thirteen years ago. Cannabis was not considered in this plan.

The State of California has declared a Drought Emergency in Sonoma County due to a severe water shortage and lack of precipitation

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\*Inadequate existing setbacks from rural residential neighborhoods and unincorporated towns that do not protect the health, safety and welfare of rural residents.

\*Proliferation and over concentration of commercial cannabis cultivation in the Dairy Belt area of Sonoma County. A large cannabis grow recently appeared at the Neve Bros property to the east of Bloomfield in the same watershed as Bloomfield with 67 existing wells. There is an 80,000 sf proposal adjacent to multiple backyards in Bloomfield and a well being drilled over the last three days. There are also existing grows west and south of Bloomfield in the Dairy Belt.

\*Diminished air quality and lack of information adequately analyzing odor emissions as they relate to public health impacts and mitigation measures

\*Inadequate existing analysis and mitigation of impacts on groundwater supply

Loss of Farmlands

aesthetic impacts

Wildfire safety and emergency access/evacuation

Climate change and the resulting impacts on fire hazards

Replacing open space lands with cannabis cultivation and processing

Emergency response and evacuations

Traffic impacts and increase in Vehicle Miles Travelled

Greenhouse Gas Emissions

Energy Use, Wildfire safety and utility services

New or Expanded electric distribution facilities

Noise impacts

\*The California Environmental Quality Act prohibits an agency from piecemeal development or “chopping up” a large project into many smaller ones each of which might individually have minimal environmental consequences but collectively create significant environmental impacts. This is what is occurring in Sonoma County and has not been addressed. The submittal adjacent to Bloomfield for eight individual applications of 10,000 sf each has a cumulative total of 80,000 sf. An example of this loophole. These applications have been submitted for ministerial processing without environmental review or hearings.

\*The Supervisors’ comments have indicated the Board is in sympathy with small growers and bringing illegal grows into the mainstream to establish viable legal businesses. The EIR and ordinance development now underway are the tools needed to determine suitable sites for cannabis and how protections are provided to rural residents and all the other valuable

resources in the County.

Given that the County has already approved Commercial Cannabis Cultivation on narrow substandard roads an additional influx creates unsafe conditions for safe evacuation as well as impeding access for fire fighters and first responder during a fire and,

Given that the County has already approved a well permit and the well drilling is under way for eight applications submitted to the Ag Commissioner for proposed ministerial permitting of a 80,000 sf commercial cannabis cultivation project in Bloomfield where a biotic study was initially required and the scope of the project was originally deemed to require a Conditional Use Permit

We the undersigned, request the Board of Supervisors immediately institute a

**A Countywide moratorium on Commercial Cannabis Cultivation. A moratorium on new and pipeline projects is imperative to protect the public health safety and welfare, to preserve the vanishing precious water resources and to protect natural environmental resources Sonoma County is known for until the Environmental Impact Report and new cannabis ordinance is adopted and in place.**

Linda Gamble, Bloomfield, Sonoma County

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**From:** [Lauren Mendelsohn](#)  
**To:** [Cannabis](#); [Crystal Acker](#); [Scott Orr](#); [Andrew Smith](#)  
**Subject:** Question about proposed moratorium on multi-tenant ZPs  
**Date:** Friday, September 10, 2021 11:22:16 AM

---

**EXTERNAL**

Good morning,

How would the proposed urgency moratorium on multi-tenant ZPs impact applicants who have submitted ZP applications but have not yet been issued a permit? Would their applications continue to be reviewed under the current standard?

Thank you.

\*\*\*\*\*



**Lauren A. Mendelsohn, Esq.**  
Senior Associate Attorney  
Law Offices of Omar Figueroa  
7770 Healdsburg Avenue  
Sebastopol, CA 95472-3352  
Tel: (707) 829-0215  
Fax: (707) 827-8538  
[lauren@omarfigueroa.com](mailto:lauren@omarfigueroa.com)  
[www.omarfigueroa.com](http://www.omarfigueroa.com)

***Have you heard about the International Cannabis Bar Association (INCBA)? [Check us out!](#) Use code "Mendelsohn" for 15% off membership and events.***



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**From:** [Luci Mendoza](#)  
**To:** [Supervisor David Rabbitt](#); [Cannabis](#)  
**Cc:** [Crystal Acker](#); [Scott Orr](#)  
**Subject:** Cannabis Ordinance  
**Date:** Friday, September 10, 2021 9:14:44 AM  
**Attachments:** [Mendoza Letter to Supervisor Rabbit 09.10.21.pdf](#)

---

**EXTERNAL**

Dear Supervisor Rabbitt,

Please see the attached letter that we would like to submit to the public record regarding the cannabis ordinance.

Thank you

Jim & Luci Mendoza

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September 9, 2021

Supervisor David Rabbitt

Sonoma County

Dear David,

This morning there was an article in The Argus Courier regarding a possible moratorium on cannabis production. Our dairy is in desperate need of additional income due to the pandemic and drought. Cost of materials, labor and regulations keep climbing and income is going down. Should we have to sell out, we could not survive on beef production without water and grass. Crops of any type are out without reliable rain/water. Cannabis is our only hope.

We have had a permit in the process all year. The group that we are working with already has plots on 3 of our neighbors. They do not draw water from wells; it is purchased from the City of Petaluma's recycled water plant. Our ranches are far enough out in the county so as not to bother neighbors or schools. The sites are off the highway and secure. They have not increased traffic.

Conversely, we are threatened by the possible compost dump planned for Stage Gulch Rd. that will threaten the neighborhood with increased traffic, odors, water depletion and pollution. If the drought doesn't destroy our organic dairy, the impact of the dump will.

It makes sense to limit cannabis production in urban areas or next to locations with schools or close residents, but in open spaces it provides a way to keep ranches in production. Cannabis has been accepted by California as an agricultural product and should be allowed to be produced in ag areas. The growth of the industry has brought financial benefits to the cities and county of Sonoma; the loss of dairies due to drought or hard times will cause a ripple effect to other support businesses in the county.

Please help us survive by at least passing the current permits in process in areas that are rural. Do not pass a complete moratorium on cannabis.

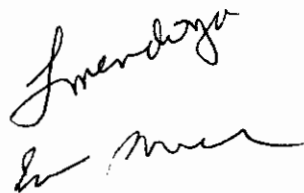
Hope to hear from you with a supportive response.

Thank you.

Jim and Luci Mendoza

601 Stage Gulch Rd.

Petaluma, 94954

Handwritten signatures of Jim and Luci Mendoza. The signature for Jim is written above the signature for Luci.

HARD COPY MAILED 9-9-21

**From:** [Mathew Hayashi](#)  
**To:** [Cannabis](#)  
**Subject:** Rethink  
**Date:** Friday, September 10, 2021 4:24:50 PM

---

**EXTERNAL**

Please rethink the moratorium plan.

Sent via the Samsung Galaxy S21 Ultra 5G, an AT&T 5G smartphone  
Get [Outlook for Android](#)

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**From:** [MR R](#)  
**To:** [Cannabis](#)  
**Subject:** moratorium  
**Date:** Friday, September 10, 2021 10:01:15 AM

---

**EXTERNAL**

This would be a good thing right

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**From:** [Meelk54](#)  
**To:** [Cannabis](#)  
**Subject:** Cannabis Moratorium--- YES!!!  
**Date:** Saturday, September 11, 2021 8:32:14 AM

---

## EXTERNAL

As a 4 decade resident of Sonoma County, I strongly support any and all cannabis operations moratoriums---be it for cultivation, sales or use. In particular I am very concerned about allowing more cultivation during this time of extreme drought with water consumption restrictions in place throughout the county and state. We do not need more water use demand at this point in time. Also, our county is already impacted by many issues including lack of affordable housing, homelessness and continued wildfire threat. It is irresponsible to promote an industry that contributes to the problems we already have. PLEASE remember, local residents deserve to be heard and heeded about what is affecting the communities in the county.

Thank you.  
Eileen Kortas  
Santa Rosa resident

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**From:** [john 777](#)  
**To:** [Cannabis](#)  
**Subject:** Cannabis ordinance  
**Date:** Sunday, September 12, 2021 1:54:51 AM

---

EXTERNAL

Hello,

I have a ministerial permit and one other person had a ministerial permit on my property at 1700 barlow lane in Sebastopol.

The ministerial process gave the other owner and me a way to do a small outdoor cultivation where a cup would have been too expensive and uncertain.

I've heard some folks making up stories and negative things about my property and farm. It is extremely private, quiet, and professional. I live on site with my wife and two small children. The local neighbors are lying about me and have no problem making up stories about anything inflammatory to get someone to stop my farm.

I am interested to invite you to my farm. You can meet my wife and also you can meet Mark Severe who operates the other ministerial permit. Our property and farm speaks for itself along with the straight A grades we have gotten from local and state inspections.

Those people who are saying that there is not enough enforcement have no idea what they are talking about. I can tell you that from a very high level of personal understanding. There are many surprise inspections and they are traumatic for small children and it's very rigorous. Why do these people want to torture cannabis farmers and see them treated like criminals?

The setbacks already are too far. 300 feet from houses is too much for most farmers to use their land. The opposition knows that and will just ask for more knowing this will cripple many farmers.

This is a stressful nightmare to cannabis operators. One moment the ordinance was moving forward to help cannabis operators who were holding on. The next moment the ordinance is dismissed after years of work including the public.

And now the emergency ordinance to stop ministerial permits with multiple tenants? That was setup that was to help people like me and Mark. We are family operators and small independent hard working people. We are from this industry and are trying to stay alive through this challenging transition.

How could all the momentum turn towards the very vocal anti-cannabis crowd? The pro-cannabis people have been exhausted out of this process from the years of work and dead ends. Now we start from scratch and an emergency ordinance is proposed to give the opposition what they want. What about the pro cannabis side?

Families like mine have trusted the county to be fair and now the opposition is getting favoritism by an emergency ordinance.

Come see my farm. See how a multi tenant operation looks. Meet me and my loved ones. We are being run through the mud and it's a terrible. It's not right what is happening to people like us. It is a travesty the life of a Sonoma cannabis operator. It feels like a torture chamber. This is our life. We don't bother anyone. Come see. You need to know how much these neighbors are lying.

Please be fair to cannabis operators who have invested their lives into their businesses. Nothing will ever satisfy the anti-cannabis crowd. The cannabis farmers need protections so we can live our lives without this torment.

We had neighbors harassing us with drones. We had trespassing neighbors. A angry woman named Tess intimidates

and screams at my wife when she is walking our small child and baby. They have written in public comment that I “occasionally” shoot high powered guns. (There has never been a gunshot fired on this property in the 12 years I’ve lived here. Ever. This is an example of the outright lies). They said I commit elder abuse because I respond to defend myself from a screaming aggressive old lady while walking w my family. That same lady sent my dog to the pound and told them I beat me dog. You seriously could not make up the lies. They think I set off fireworks when it is the property accross the creek that has the large man made lake. It never is us and they continue to blame us.

These people loved me and my family before they found out I was a cannabis operator. The. They turned on us and ganged up against us. It’s hard to explain how this feels with a wife and small children. I won’t let them bully us. And I hope you all understand how this process has created monsters in these people. Cannabis operators have been extincted and it’s incredibly sad.

Please make things more ministerial and adhering to state law. Setback need to be minimized. Ag land should be protected from groups of lying and antagonistic opposition.

We thought the ordinance that passed planning 3-2 was very good. I prefer the original proposer ordinance by commissioner Andrew smith. It created more ministerial which will create the certainty needed for cannabis operators and it also will DEACTIVATE these monsters doing and saying anything they can no matter how untrue or manipulative to achieve their goals to harm cannabis operators.

It’s hard to be optimistic seeing the emergency ordinance proposal. It’s such a bad idea. Leave the system alone for now. Enough damage has already been done to the poor independent cannabis farmers. We were counting on chapter 26 and 38. And now we have to wait 3 years. And now they want to end ministerial path for multiple tenants. It’s so bad what is happening. I’m starting to feel like this is the county turning it’s back on cannabis before we have even had a chance. The spiteful liars are laughing and families like mine are considering if we can live like this anymore.

Thank you for your work. I understand how difficult this is. I will do my best to trust this process.

Sincerely,  
John Loe  
Loe Cannabis  
707-237-4751

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**From:** [New Family Farm](#)  
**To:** [Susan Gorin](#); [David Rabbitt](#); [Chris Coursey](#); [district4](#); [Lynda Hopkins](#); [Robert Pittman](#); [Jennifer Klein](#); [Andrew Smith](#)  
**Cc:** [Tennis Wick](#); [Sita Kuteira](#); [Linda Schiltgen](#); [Sheryl Bratton](#)  
**Subject:** Cannabis Urgency Moratorium  
**Date:** Monday, September 13, 2021 2:09:49 PM

---

## EXTERNAL

To all Sonoma County Supervisors, County Counsel and all other stakeholders:

I am writing today regarding the Cannabis Urgency Moratorium. We want to make sure you know that your decisions could have catastrophic effects on outdoor cultivation in Sonoma County.

The path to outdoor cannabis licensure through PRMD is onerous and speaking simply, essentially impossible for small and self-financed farmers. If you take away the current structure that allows for license stacking you will effectively kill the ability for Sonoma County cultivators to operate. This will contribute to a huge loss of jobs, loss of economic activity (UC Santa Baraba did a study that showed that 1 acre of cultivated cannabis contributes \$785,000 per year in local consumption of goods and services), and loss of tax dollars for the county.

**We ask that you allow all currently permitted cannabis cultivation to continue at its current acreage through the agency that certified it until the EIR is signed and ratified.** It is prudent and responsible to allow us to continue farming until the new rules have been researched, discussed, and re-written.

As a mixed vegetable and cannabis operation we are dependent on cannabis as an integral part of our financial viability. It is irresponsible and unfair to take away our ability to cultivate cannabis at the acreage we've been permitted for during the interim period when the EIR is being developed. As 30 year + residents who were raised in Sonoma County we believe cannabis has an integral role to play in keeping the rural and farming culture of Sonoma County alive.

Thanks for your consideration

Adam Davidoff

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**From:** [Dawne Sacchetti](#)  
**To:** [Susan Gorin](#); [David Rabbitt](#); [Chris Coursey](#); [district4](#); [Lynda Hopkins](#); [Jennifer Klein](#); [Andrew Smith](#); [Debbie Latham](#)  
**Cc:** [Tennis Wick](#); [Sita Kuteira](#); [Sheryl Bratton](#)  
**Subject:** Cannabis Emergency Moratorium  
**Date:** Monday, September 13, 2021 5:31:50 PM

---

## EXTERNAL

To all Sonoma County Supervisors, County Counsel and the AG/Cannabis County personnel,

This email is in regards to the Cannabis Urgency Moratorium. We need you to know that these decisions you are making could have catastrophic effects on outdoor cultivation in Sonoma County.

The path to outdoor cannabis licensure through PRMD will be tenuous and honestly, essentially impossible for small, self-financed farmers. If you take away the current structure that allows for license stacking, you will effectively kill the ability for Sonoma County cultivators to operate. This will contribute to a huge loss of jobs, loss of economic activity (UC Santa Barbara did a study that showed that 1 acre of cultivated cannabis contributes \$785,000 per year in local consumption of goods and services), not to mention a major loss of tax dollars for the county.

***We ask that you allow all currently permitted cannabis cultivation to continue at its current acreage through the agency that certified it, until the EIR is reviewed, signed and ratified.*** It is prudent and responsible to allow them to continue farming until the new rules have been researched, discussed, and re-written.

Cannabis cultivators are dependent on cannabis as an integral part of their financial viability. During this interim period when the EIR is being evaluated, it seems irresponsible and unfair to take away their ability to cultivate cannabis with the acreage they already have legal licenses for.

As long-term residents of Sonoma County, we believe cannabis has an integral role to play in keeping the rural and farming culture of Sonoma County alive.

Thank you for your time and hopefully your consideration.

Dawne Sacchetti  
River House Consulting  
(707) 326-9924  
[dawnesacchetti@gmail.com](mailto:dawnesacchetti@gmail.com)

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**From:** [joeldyar@sbcglobal.net](mailto:joeldyar@sbcglobal.net)  
**To:** [Susan Gorin](#); [Cannabis](#)  
**Subject:** Five voters supportdting the proposed permitting moratorium  
**Date:** Monday, September 13, 2021 11:34:07 AM

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## EXTERNAL

There are five voters in my household that support passage of the proposed permitting moratorium scheduled for consideration in the 9/21/21 hearing.

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**From:** [Jane Marx](#)  
**To:** [Cannabis](#)  
**Subject:** Moratorium, Multi-tenant cannabis permits  
**Date:** Monday, September 13, 2021 10:08:03 AM

---

**EXTERNAL**

September 13, 2021

To: Sonoma County Board of Supervisors

Re: Moratorium, Multi-tenant cannabis permits

**We request that the Board of Supervisors adopt the Interim Moratorium on Multi-Tenant Cannabis Cultivation Permits that will be under consideration on September 21, 2021.**

**While I am favor of this moratorium, in my view it does not go far enough.**

The Board's initial decision not to do an EIR when the cannabis ordinance in 2016 was considered along with the multi-tenant cannabis cultivation permit process clearly shows that there are unintended consequences that were not considered by the Board in its rush to allow commercial cannabis operations in the County despite the consequences.

Please don't miss an opportunity to correct that mistake. Respectfully, how can the continuing processing and approval of any cannabis permits be allowed to continue when it is clear that it has shown that already permitted operations have had cumulative impacts and are having significant adverse impacts to areas of the county and particularly to rural neighborhoods that should be considered in the upcoming EIR? This is a serious question for which we would like an answer. This is also especially true given that the County's enforcement of the current ordinance and abatement of violations has been ineffective apparently because staff doesn't have the resources and can't even keep up with violations from operations already in place.

**Therefore we respectfully ask that the Board not only adopt the proposed interim moratorium ordinance but also immediately place on an agenda as soon as possible consideration of a moratorium on the acceptance, processing, and approval of any more cannabis operation applications for permits of any kind at least until the anticipated EIR is complete.**

Thank you for your attention and consideration.

Jane Marx and David Dammuller  
2944 Bardy Road  
Santa Rosa, CA 95404  
[janemarxdesign@sonic.net](mailto:janemarxdesign@sonic.net)

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**From:** [Patchwork Farms](#)  
**To:** [Susan Gorin](#); [David Rabbitt](#); [Chris Coursey](#); [district4](#); [Lynda Hopkins](#); [Jennifer Klein](#); [Andrew Smith](#); [Debbie Latham](#)  
**Cc:** [Tennis Wick](#); [Sita Kuteira](#); [Sheryl Bratton](#)  
**Subject:** Cannabis Urgency Moratorium  
**Date:** Monday, September 13, 2021 4:56:51 PM

---

## EXTERNAL

To all Sonoma County Supervisors, County Counsel and the AG/Cannabis County personnel,

This email is in regards to the Cannabis Urgency Moratorium. We need you to know that these decisions you are making could have catastrophic effects on outdoor cultivation in Sonoma County.

The path to outdoor cannabis licensure through PRMD will be tenuous and honestly, essentially impossible for small, self-financed farmers. If you take away the current structure that allows for license stacking, you will effectively kill the ability for Sonoma County cultivators to operate. This will contribute to a huge loss of jobs, loss of economic activity (UC Santa Baraba did a study that showed that 1 acre of cultivated cannabis contributes \$785,000 per year in local consumption of goods and services), not to mention a major loss of tax dollars for the county.

***We ask that you allow all currently permitted cannabis cultivation to continue at its current acreage through the agency that certified it, until which time the EIR is reviewed, signed and ratified.*** It is prudent and responsible to allow us to continue farming until the new rules have been researched, discussed, and re-written.

As organic farmers and cannabis cultivations, we are dependent on cannabis as an integral part of our financial viability. During this interim period when the EIR is being evaluated, it seems irresponsible and unfair to take away our ability to cultivate cannabis with the acreage we already have legal licenses for. As long-term residents of Sonoma County, we believe cannabis has an integral role to play in keeping the rural and farming culture of Sonoma County alive.

Thank you for your time and hopefully your consideration.

Joe Ullman

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**From:** [Lauren Mendelsohn](#)  
**To:** [Cannabis](#); [Crystal Acker](#); [Scott Orr](#); [Andrew Smith](#); [Sita Kuteira](#)  
**Subject:** Re: Question about proposed moratorium on multi-tenant ZPs  
**Date:** Monday, September 13, 2021 1:07:33 PM

---

**EXTERNAL**

Good afternoon,

Just following up on my previous question: How would the proposed urgency moratorium on multi-tenant ZPs impact applicants who have submitted ZP applications but have not yet been issued a permit? Would their applications continue to be reviewed under the current standard?

Thank you.

\*\*\*\*\*



**Lauren A. Mendelsohn, Esq.**  
Senior Associate Attorney  
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7770 Healdsburg Avenue  
Sebastopol, CA 95472-3352  
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Fax: (707) 827-8538  
[lauren@omarfigueroa.com](mailto:lauren@omarfigueroa.com)  
[www.omarfigueroa.com](http://www.omarfigueroa.com)

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\*\*\*\*\*

On Fri, Sep 10, 2021 at 11:21 AM Lauren Mendelsohn <[lauren@omarfigueroa.com](mailto:lauren@omarfigueroa.com)> wrote:  
Good morning,

How would the proposed urgency moratorium on multi-tenant ZPs impact applicants who have submitted ZP applications but have not yet been issued a permit? Would their applications continue to be reviewed under the current standard?

Thank you.

\*\*\*\*\*



**Lauren A. Mendelsohn, Esq.**  
Senior Associate Attorney  
Law Offices of Omar Figueroa  
7770 Healdsburg Avenue  
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Fax: (707) 827-8538  
[lauren@omarfigueroa.com](mailto:lauren@omarfigueroa.com)  
[www.omarfigueroa.com](http://www.omarfigueroa.com)

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**From:** [Lauren Mendelsohn](#)  
**To:** [Sita Kuteira](#)  
**Cc:** [Cannabis](#); [Crystal Acker](#); [Scott Orr](#); [Andrew Smith](#)  
**Subject:** Re: Question about proposed moratorium on multi-tenant ZPs  
**Date:** Monday, September 13, 2021 1:53:26 PM

---

**EXTERNAL**

Thank you. Would the proposed measure allow for one 10Ksf Zoning Permit and one 30Ksf Use Permit on the same property? Does your answer to the foregoing change depending on whether the ZP and UP applicants are related by business or family interest?

\*\*\*\*\*



**Lauren A. Mendelsohn, Esq.**  
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Tel: (707) 829-0215  
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[lauren@omarfigueroa.com](mailto:lauren@omarfigueroa.com)  
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\*\*\*\*\*

On Mon, Sep 13, 2021 at 1:11 PM Sita Kuteira <[Sita.Kuteira@sonoma-county.org](mailto:Sita.Kuteira@sonoma-county.org)> wrote:

| Hi Lauren,



Under the proposed ordinance, the County would not issue any further multi-tenant permits and those with applications under review would need to reduce to one application per parcel to fit within the ministerial limit or obtain a use permit.

Thanks,

Sita

**Sita Kuteira**

Deputy County Counsel

County of Sonoma

575 Administration Drive, Room 105A

Santa Rosa, CA 95403

o: 707.565.2421

d: 707.565.1106

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**From:** Lauren Mendelsohn <[lauren@omarfigueroa.com](mailto:lauren@omarfigueroa.com)>

**Sent:** Monday, September 13, 2021 1:07 PM

**To:** Cannabis <[Cannabis@sonoma-county.org](mailto:Cannabis@sonoma-county.org)>; Crystal Acker <[Crystal.Acker@sonoma-county.org](mailto:Crystal.Acker@sonoma-county.org)>; Scott Orr <[Scott.Orr@sonoma-county.org](mailto:Scott.Orr@sonoma-county.org)>; Andrew Smith <[Andrew.Smith@sonoma-county.org](mailto:Andrew.Smith@sonoma-county.org)>; Sita Kuteira <[Sita.Kuteira@sonoma-county.org](mailto:Sita.Kuteira@sonoma-county.org)>

**Subject:** Re: Question about proposed moratorium on multi-tenant ZPs

**EXTERNAL**

Good afternoon,

Just following up on my previous question: How would the proposed urgency moratorium on multi-tenant ZPs impact applicants who have submitted ZP applications but have not yet been issued a permit? Would their applications continue to be reviewed under the current standard?

Thank you.

\*\*\*\*\*



**Lauren A. Mendelsohn, Esq.**

Senior Associate Attorney

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Tel: (707) 829-0215

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Good morning,

How would the proposed urgency moratorium on multi-tenant ZPs impact applicants who have submitted ZP applications but have not yet been issued a permit? Would their applications continue to be reviewed under the current standard?

Thank you.

\*\*\*\*\*



**Lauren A. Mendelsohn, Esq.**

Senior Associate Attorney

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**From:** [Lauren Mendelsohn](#)  
**To:** [Sita Kuteira](#)  
**Cc:** [Cannabis](#); [Andrew Smith](#); [Christina Rivera](#); [Scott Orr](#); [Crystal Acker](#)  
**Subject:** Re: Question about proposed moratorium on multi-tenant ZPs  
**Date:** Monday, September 13, 2021 2:20:30 PM

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## EXTERNAL

Thanks, Sita.

Has the county considered how this will negatively impact small farms? With land prices in Sonoma County as high as they are, and the requirement that any amount of outdoor or mixed-light cultivation take place on a parcel at least 10 acres in size (despite the 2016 NegDec and original ordinance which allowed for small grows on parcels smaller than 10 acres), the ability for small farmers to be able to lease part of a property for an outdoor permit of up to 10,000sf was a lifeline that would no longer be available to them. If the county suspects certain operators are taking advantage of the system and skirting the rules, why not just go after those operators instead of eliminating a useful pathway for everyone else? Furthermore, if the county adopts this they would be getting rid of one of the primary means for local cultivators to participate in the highly-anticipated Cannabis Appellations Program, which only outdoor-grown cannabis qualifies for. Does Wine Country want to shut the door on appellations, which in the context of wine have helped to make Sonoma County the tourist destination that it is, and which in the context of cannabis will only continue this trend?

Also, did Sonoma County end up accepting the \$1+ million state grant intended to help cultivators through the licensing process? If so, how is that money being spent? The proposed moratorium does nothing to help this, and in many cases would make it harder for current ZP-permit holders who have state provisional licenses to obtain an annual license as they might need to start back at square one and apply for a UP.

Lauren

\*\*\*\*\*



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\*\*\*\*\*

On Mon, Sep 13, 2021 at 1:58 PM Sita Kuteira <[Sita.Kuteira@sonoma-county.org](mailto:Sita.Kuteira@sonoma-county.org)> wrote:

Hi Lauren,

If the ordinance requires a use permit, there could only be one cannabis permit on the property.

Sita

---

**From:** Lauren Mendelsohn <[lauren@omarfigueroa.com](mailto:lauren@omarfigueroa.com)>

**Sent:** Monday, September 13, 2021 1:53 PM

**To:** Sita Kuteira <[Sita.Kuteira@sonoma-county.org](mailto:Sita.Kuteira@sonoma-county.org)>

**Cc:** Cannabis <[Cannabis@sonoma-county.org](mailto:Cannabis@sonoma-county.org)>; Crystal Acker <[Crystal.Acker@sonoma-county.org](mailto:Crystal.Acker@sonoma-county.org)>; Scott Orr <[Scott.Orr@sonoma-county.org](mailto:Scott.Orr@sonoma-county.org)>; Andrew Smith <[Andrew.Smith@sonoma-county.org](mailto:Andrew.Smith@sonoma-county.org)>

**Subject:** Re: Question about proposed moratorium on multi-tenant ZPs

**EXTERNAL**

Thank you. Would the proposed measure allow for one 10Ksf Zoning Permit and one 30Ksf Use Permit on the same property? Does your answer to the foregoing change depending on whether the ZP and UP applicants are related by business or family interest?

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**Lauren A. Mendelsohn, Esq.**

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Hi Lauren,

Under the proposed ordinance, the County would not issue any further multi-tenant permits and those with applications under review would need to reduce to one application per parcel to fit within the ministerial limit or obtain a use permit.

Thanks,

Sita

**Sita Kuteira**

Deputy County Counsel

County of Sonoma

575 Administration Drive, Room 105A

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**From:** Lauren Mendelsohn <[lauren@omarfigueroa.com](mailto:lauren@omarfigueroa.com)>

**Sent:** Monday, September 13, 2021 1:07 PM

**To:** Cannabis <[Cannabis@sonoma-county.org](mailto:Cannabis@sonoma-county.org)>; Crystal Acker <[Crystal.Acker@sonoma-county.org](mailto:Crystal.Acker@sonoma-county.org)>; Scott Orr <[Scott.Orr@sonoma-county.org](mailto:Scott.Orr@sonoma-county.org)>; Andrew Smith <[Andrew.Smith@sonoma-county.org](mailto:Andrew.Smith@sonoma-county.org)>; Sita Kuteira <[Sita.Kuteira@sonoma-county.org](mailto:Sita.Kuteira@sonoma-county.org)>

**Subject:** Re: Question about proposed moratorium on multi-tenant ZPs



**EXTERNAL**

Good afternoon,

Just following up on my previous question: How would the proposed urgency moratorium on multi-tenant ZPs impact applicants who have submitted ZP applications but have not yet been issued a permit? Would their applications continue to be reviewed under the current standard?

Thank you.

\*\*\*\*\*



**Lauren A. Mendelsohn, Esq.**

Senior Associate Attorney

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***Have you heard about the International Cannabis Bar Association (INCBA)? [Check us out!](#) Use code "Mendelsohn" for 15% off membership and events.***



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On Fri, Sep 10, 2021 at 11:21 AM Lauren Mendelsohn <[lauren@omarfigueroa.com](mailto:lauren@omarfigueroa.com)> wrote:

Good morning,

How would the proposed urgency moratorium on multi-tenant ZPs impact applicants who have submitted ZP applications but have not yet been issued a permit? Would their applications continue to be reviewed under the current standard?

Thank you.

\*\*\*\*\*



**Lauren A. Mendelsohn, Esq.**

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**From:** [Family Florals](#)  
**To:** [Susan Gorin](#); [David Rabbitt](#); [Chris Coursey](#); [district4](#); [Lynda Hopkins](#); [Jennifer Klein](#); [Andrew Smith](#); [Debbie Latham](#)  
**Cc:** [Tennis Wick](#); [Sita Kuteira](#); [Linda Schiltgen](#); [Sheryl Bratton](#)  
**Subject:** Cannabis Moratorium  
**Date:** Monday, September 13, 2021 4:26:06 PM

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## EXTERNAL

To all Sonoma County Supervisors, County Counsel and the AG/Cannabis County personnel,

This email is in regards to the Cannabis Urgency Moratorium. We need you to know that these decisions you are making could have catastrophic effects on outdoor cultivation in Sonoma County.

The path to outdoor cannabis licensure through PRMD will be tenuous and honestly, essentially impossible for small, self-financed farmers. If you take away the current structure that allows for license stacking, you will effectively kill the ability for Sonoma County cultivators to operate. This will contribute to a huge loss of jobs, loss of economic activity (UC Santa Baraba did a study that showed that 1 acre of cultivated cannabis contributes \$785,000 per year in local consumption of goods and services), not to mention a major loss of tax dollars for the county.

***We ask that you allow all currently permitted cannabis cultivation to continue at its current acreage through the agency that certified it , until which time the EIR is reviewed, signed and ratified.*** It is prudent and responsible to allow us to continue farming until the new rules have been researched, discussed, and re-written.

As organic farmers and cannabis cultivations, we are dependent on cannabis as an integral part of our financial viability. During this interim period when the EIR is being evaluated, it seems irresponsible and unfair to take away our ability to cultivate cannabis with the acreage we already have legal licenses for. As long-term residents of Sonoma County, we believe cannabis has an integral role to play in keeping the rural and farming culture of Sonoma County alive.

Thank you for your time and hopefully your consideration.

Ryan Power

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Family Florals  
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