

Extension of Urgency Ordinance No. 6354 -  
Cannabis Ordinance Multi-Tenant  
Moratorium

Public Comment received  
after the close of the public hearing on  
September 21, 2021 through  
October 14, 2021

**From:** [rrudnansky@sonic.net](mailto:rrudnansky@sonic.net)  
**To:** [Cannabis](#); [Susan Gorin](#)  
**Subject:** Board meeting of Sept 21  
**Date:** Tuesday, September 21, 2021 3:33:45 PM

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**EXTERNAL**

I want to speak in favor of the moratorium on the agenda but was not called on before the public hearing was closed.

I strongly am in favor of the moratorium.

Richard Rudnansky

Sent from my Verizon Wireless 5G Phone

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**From:** [Jeffery Matthews](#)  
**To:** [BOS](#); [Andrew Smith](#); [Cannabis](#); ["Valorie Dallas"](#); ["Veva Edelson"](#); ["Toby Levy"](#); [Diane](#)  
**Subject:** Ministerial Permitting  
**Date:** Thursday, September 23, 2021 8:34:13 AM

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## EXTERNAL

Dear Supervisors and Commissioner:

I have followed cannabis permitting process pretty closely over the last many months and am struck that Commissioner Smith has stated many times that discretionary determinations must be made under the Conditional Use Permit process which is subject to EIR / CEQA review.

By not enforcing the provisions of the Ministerial Permit Process ie. **"Zoning permit must be approved before any work begins"** (last paragraph of the permit application) and allowing unpermitted cannabis operations to continue, isn't the AG Department in effect, making discretionary determinations that are not under its purview.

The Bloomfield site (Cockrill St.) has almost 2 wells already drilled, The Neve site (Roblar Road @ Valley Ford Road) already has fencing and hoop houses installed, all unpermitted.

All AG Department Ministerial Permit applications should be turned over to PRMD for proper Conditional Use Permitting.

Respectfully,

Jeff Matthews  
Bloomfield

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**From:** [Richard Crowley](#)  
**To:** [Cannabis](#)  
**Subject:** Moratorium  
**Date:** Friday, September 24, 2021 9:05:28 AM

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EXTERNAL

I'm encouraged by the Supervisors' decision to halt certain kinds of permits for 45 days while further study is conducted and input is solicited.

I am writing to ask that you PLEASE MAKE THE MORATORIUM PERMANENT. An area short on water has no business jumpstarting a new, notoriously thirsty, agricultural industry. Please choose people's water security over the allure of new business, new revenue, new taxes, etc. Leave cannabis to parts of the country with enough water.

Thank you,

Richard Crowley  
8535 Franz Valley School Road  
Calistoga, CA 94515

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**From:** [Francine Baldus](#)  
**To:** [Cannabis](#); [Lynda Hopkins](#); [Leo Chyi](#)  
**Subject:** Re: Cannabis  
**Date:** Sunday, September 26, 2021 4:57:46 PM

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## EXTERNAL

Thank you for the opportunity to add my opinion to your deliberations regarding the proposal to enlarge the scope of cannabis growing legally in Sonoma County.

I am opposed to any further encroachment of this type of land use. The degradation of groundwater, arable land, and neighborhoods occurs with cannabis growing. I have seen first hand the effects of a grower, who was finally closed down by the FBI. The newspaper covers stories of the violence that this crop engenders, and many grow sites need to be protected by serious armed surveillance.

By contrast, our vegetable farmers are struggling to find water sources and affordable land.

Going into the grocery store we note the high cost of produce, like \$3.99/lb for locally grown zucchini. These local small growers should be encouraged because they provide needed food locally for our county's residence ... this is one of the important components to sustainability and climate change.

Finally, there are hidden costs to encouraging cannabis cultivation, from administration of permits to policing such sites, just to name a few. Further, the growers' children and families are negatively impacted by this crop's illegal element.

Sincerely,  
Francine Baldus  
Sebastopol

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**From:** [Mike Baldus](#)  
**To:** [Cannabis](#); [Lynda Hopkins](#); [Leo Chyi](#)  
**Subject:** opposition to cannabis  
**Date:** Sunday, September 26, 2021 4:54:25 PM

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**EXTERNAL**

**I strongly believe that our county does not need more cannabis!! I am completely opposed to growing, selling, and consuming cannabis as it is an addictive, psychoactive and gateway drug. Cannabis risks and harms outweigh any possible benefits. As a resident who depends on a well for our family's water, I am also extremely concerned about the use of precious groundwater for a superfluous crop.**

**If unfortunately, there is going to be cannabis grown in our county, I urge clear and restrictive limitations. For example, limit cannabis cultivation and processing to areas that do not create noise and odor nuisances for residents, are not in public view, are not in impaired watersheds and do not impact public safety such as high fire-risk zones or areas without legal fire-safe roads.**

**Respectfully,**

**Mike Baldus  
Sebastopol Resident**

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**From:** [Sita Kuteira](#)  
**To:** [Deborah Eppstein](#); [Cannabis](#)  
**Cc:** [Robert Pittman](#)  
**Subject:** RE: multi-tenant zoning permits  
**Date:** Monday, September 27, 2021 11:05:16 AM

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Hi Debbie,

Thank you for your comments. Including McCall here so she can add it to the record for the 10/26 item.

Best,  
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:** Deborah Eppstein <deppstein@gmail.com>  
**Sent:** Friday, September 24, 2021 1:06 PM  
**To:** Sita Kuteira <Sita.Kuteira@sonoma-county.org>  
**Cc:** Robert Pittman <Robert.Pittman@sonoma-county.org>  
**Subject:** multi-tenant zoning permits

**EXTERNAL**

Trying to keep Sita in the right, with Andrew making the mistake

Hi Sita,

I would like to follow up on your statements at the September Board of Supervisors' meeting concerning the abuse of the granting of multi-tenant ministerial permits. You indicated that your interpretation of the ordinance allowed multi-tenant outdoor cultivation up to 1 acre per parcel. However, that interpretation conflicts with the rest of the ordinance and the MND which require anything over 10,000 sf per parcel to conduct full CEQA analysis under a CUP. The specific language of the ordinance § 26-88-254(f)(2) says that multi-tenant operations are allowed as long as

"the aggregate cultivation area does not exceed the maximum area allowed for the cultivation type and parcel size in compliance with Table 1A-D"

Table 1A limits zoning permits to 10,000 sf of outdoor cultivation per parcel, which also applies to multi-

tenant permits as per the September 14 letter from Block&Block. Allowing multiple zoning permits to equal the maximum size required by a CUP in Table 1A is internally contradictory. By that logic, one could allow multi-tenant indoor cultivation up to 5000 sf also with only zoning permits and no CEQA analysis, again in conflict with the ordinance requiring CEQA analysis and a CUP for a 5000 sf indoor grow.

Each clause in an ordinance must be read so it is internally consistent with the document as a whole. Apparently the Agricultural Commissioner was not aware of that requirement.

I hope County Counsel can so advise the Agricultural Commissioner to properly guide the follow up recommendations to the Board of Supervisors on October 26, which would limit multi-tenant operations to the maximum aggregate area for that cultivation type as specified for zoning permits.

I look forward to your reply.

Best regards,

Deborah Eppstein  
801-556-5004

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**From:** [Deborah Eppstein](#)  
**To:** [Sita Kuteira](#)  
**Cc:** [Cannabis](#); [Robert Pittman](#)  
**Subject:** Re: multi-tenant zoning permits  
**Date:** Monday, September 27, 2021 12:30:15 PM

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## EXTERNAL

Hi Sita,  
Thanks for your note. Can you please give a reply to my comments? That would be most helpful.

Thanks,  
Debby

On Sep 27, 2021, at 11:05 AM, Sita Kuteira <[Sita.Kuteira@sonoma-county.org](mailto:Sita.Kuteira@sonoma-county.org)> wrote:

Hi Debbie,

Thank you for your comments. Including McCall here so she can add it to the record for the 10/26 item.

Best,  
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:** Deborah Eppstein <[deppstein@gmail.com](mailto:deppstein@gmail.com)>  
**Sent:** Friday, September 24, 2021 1:06 PM  
**To:** Sita Kuteira <[Sita.Kuteira@sonoma-county.org](mailto:Sita.Kuteira@sonoma-county.org)>  
**Cc:** Robert Pittman <[Robert.Pittman@sonoma-county.org](mailto:Robert.Pittman@sonoma-county.org)>  
**Subject:** multi-tenant zoning permits

## EXTERNAL

Trying to keep Sita in the right, with Andrew making the mistake

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I look forward to your reply.

Best regards,

Deborah Eppstein  
801-556-5004

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**From:** [Luci Mendoza](#)  
**To:** [Cannabis](#)  
**Subject:** moratorium  
**Date:** Monday, September 27, 2021 8:02:57 AM

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## EXTERNAL

We have sent a previous letter, however I would like to reiterate some points. We understand people that are protesting the development of cannabis sites in urban settings or close to housing in semi-developed area of the county. We understand the concern of depleting water sources. We have 650 acres, 3 parcels; neighbors on 3 sides of us already have large cannabis sites; recycled water from the City of Petaluma will be used, not ground water. We have been through the permitting process and the only reason we are stopped is "multiple owners." The site selected for our plots is level and next to the city provided water source. Other areas of our ranch are too hilly and not near water and would interfere with our dairy. Our neighbors are not complaining about smells or whatever; they already have cannabis. Please consider site locations and not a blanket moratorium. There are few, if any, alternatives for us to diversify. Please consider. Luci Mendoza

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**From:** [attack of the clones](#)  
**To:** [Cannabis](#)  
**Subject:** Multiple zoning permits  
**Date:** Monday, October 4, 2021 10:16:01 AM

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## EXTERNAL

Hello,

four other tenants and I applied for ministerial permits ZPC21-0001- ZPC21-0005.

The other four are local Sonoma county cannabis growers who are leasing space in our large steel building.

None of us would have spent our time or money to apply for a CUP at this juncture since my CUPs have taken close to 5 years and none of us can afford that expense. We also don't want to deal with the neighborhood hate groups that have been intimidating and harassing cannabis operators.

Our plans to use multi tenant permits for the steel building started well over a year ago when I began work to turn my metal Ag exempt building to a permitted building suitable for cannabis use. We have spent a lot of money and time on that process and all that remains is the fire sprinklers I am told by the inspectors.

Each of the tenants of the steel building including me spent a lot of time and money on preparing documents, consultants, and lawyers. This is something we all have been working on for close to a year.

We hope consideration is giving to people like us who spent time and money applying for the permits based on the current application of the law before it was changed.

Thank you,  
John Loe  
1700 Barlow Lane

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**From:** [Sita Kuteira](#)  
**To:** [Cannabis](#)  
**Subject:** FW: Cannabis Ordinance  
**Date:** Monday, October 4, 2021 2:32:34 PM

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**From:** Dodesr <dodesr@aol.com>  
**Sent:** Monday, October 4, 2021 2:16 PM  
**To:** Tennis Wick <Tennis.Wick@sonoma-county.org>; Scott Orr <Scott.Orr@sonoma-county.org>; Andrew Smith <Andrew.Smith@sonoma-county.org>; Sita Kuteira <Sita.Kuteira@sonoma-county.org>  
**Subject:** Cannabis Ordinance

## EXTERNAL

TextDescription automatically generated with low confidence



October 2, 2021

To Chair Hopkins and Members of the Sonoma County Board of Supervisors:

The League of Women Voters of Sonoma County recognizes the severity of water shortage for Sonoma County, further heightened by our current drought crisis and ongoing hotter, drier weather due to climate change. The LWVSC has no position about cannabis, and our concerns expressed here are just about water usage.

Accordingly, to properly protect our water resources, the LWVSC proposes that the Supervisors:

**Extend the moratorium surrounding multi-tenant ministerial permitting and prevent renewals of all such permits that avoided the required CEQA water analysis**

The League of Women Voters appreciates your thoughtful analysis and careful consideration, to lead our County in dealing with drought and climate change emergencies.

Sincerely,

Donna Roper-President<sup>[1]</sup><sub>[SEP]</sub>

Leona Judson- Chair of Advocacy<sup>[1]</sup><sub>[SEP]</sub> League of Women Voters of Sonoma County

555 5<sup>th</sup> Street Suite 300 O

Santa Rosa, CA 95401

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**From:** [BOS](#)  
**To:** [Andrea Krout](#); [Arielle Kubu-Jones](#); [Elise Weiland](#); [Hannah Whitman](#); [Jason Wilson](#); [Jennifer Mendoza](#); [Jenny Chamberlain](#); [Karina Garcia](#); [Keith Roberts](#); [Leo Chyi](#); [Lynn Morton-Weil](#); [Mary Agneberg](#); [Tina Thomas](#); [district3; Cannabis](#)  
**Subject:** FW: Moratorium on ministerial cannabis permits  
**Date:** Monday, October 11, 2021 11:05:14 AM

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**From:** concerned citizens <ccobloomfield@gmail.com>  
**Sent:** Monday, October 11, 2021 10:50 AM  
**To:** Lynda Hopkins <Lynda.Hopkins@sonoma-county.org>; Leo Chyi <Leo.Chyi@sonoma-county.org>; BOS <BOS@sonoma-county.org>  
**Cc:** David Rabbitt <David.Rabbitt@sonoma-county.org>; Andrea Krout <Andrea.Krout@sonoma-county.org>  
**Subject:** Moratorium on ministerial cannabis permits

## EXTERNAL

October 11, 2021

To Chair Hopkins and Members of the Sonoma County Board of Supervisors:

CCOBloomfield recognizes the severity of water shortage for Sonoma County, further heightened by our current drought crisis and ongoing hotter, drier weather due to climate change. We represent a rural community with approximately 67 wells that we rely on. While we understand that there are many pro's to legalizing cannabis and creating pathways to grow cannabis on agricultural lands in Sonoma County we urge you to impose a moratorium on all ministerial cannabis permits within a 1000 ft setback buffer of the the approximate 48 rural enclaves in Sonoma County. A conditional use permit within 1000 ft of a rural enclave will ease the tensions being felt around the county. It will also allow consideration of issues relative to each individual rural enclave

Accordingly, to properly protect our water resources, and the health and well being of our rural residents CCOBloomfield proposes that the Supervisors:

**Extend the moratorium surrounding multi-tenant ministerial permitting and prevent renewals of all such permits that avoided the required CEQA water analysis and  
Impose a moratorium on all ministerial cannabis permits within 1000 ft of rural enclaves.**

CCOBloomfield appreciates your thoughtful analysis and careful consideration, to lead our County in dealing with drought and climate change emergencies. We all need a place to rest and restore. Our homes are where we do that.

Sincerely,

Veva Edelson forvCCOBloomfield

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**From:** [Lisa Lai](#)  
**To:** [Susan Gorin](#)  
**Cc:** [BOS](#); [Cannabis](#)  
**Subject:** Multi-Tenant Moratorium  
**Date:** Thursday, October 14, 2021 9:04:11 AM

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**EXTERNAL**

Hi Ms. Gorin,

Attached you will find a document I received from a public records request. If you go to the 2nd tab and look under column P, you will find the mailing addresses for the Ag cannabis permits. If the address is 2349 Circadian Way, you have found the parent company. They are the ones that are taking advantage of the multi-tenant loop hole to build a large canopy in Sonoma County.

Andrew may not have a "forensic accounting" team, but this is glaringly obvious.

(Please leave the attachment off the public record.)

Lisa  
Sonoma

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