

Attachment F Addendum 2
Public Comment – Written
March 16, 2021
Through
March 17, 2021 at 12:30 PM

From: [Angela Johnson](#)
To: [Susan Gorin](#); [Cannabis](#)
Subject: Sonoma county cannabis ordinances
Date: Tuesday, March 16, 2021 7:27:51 PM

EXTERNAL

I am sending this email in strong opposition to the proposed cannabis ordinance that is going to a hearing March 18th. I have been a resident in the valley since 1990 and hope to stay here for many years to come. I am against the ordinance to allow cannabis activities as it is outlined. I feel it is allowing this new industry a much too large of a foothold in our County and specifically Bennet Valley which will eliminate other agricultural businesses. It is a business that is bringing with it significant risk to existing residents including security, traffic as well as a very unwanted odor impact. There isn't another agricultural business in the County that will require armed security and we as residents in Bennet Valley do not want this imposed by the County. The possible hoop houses being allowed will be a blight on the valley beyond comprehension. When we installed a solar field to do my part in supporting green energy the County actually forced me to relocate it on my property to a less effective location which caused me to increase the number of solar panels just to lessen the visual impact to people driving by and now you are proposing to allow acres and acres of hoop houses. In addition, if we want to paint our houses, we are required to use earth tones as to not impact our visual corridor. Those white hoop houses will take away from the beauty of our Valley.

Allowing this to happen will most definitely impact our tourism. It will add a very negative element to our community.

I feel the activity doesn't belong in the Bennet Valley area and in a much smaller capacity in the County as a whole.

Thank you for your consideration.

Angela Johnson

Sent from my iPhone

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From: [Chelsea Holup](#) on behalf of [PlanningAgency](#)
To: [Cannabis](#)
Subject: FW: cannabis hearing 3/18
Date: Tuesday, March 16, 2021 11:37:02 AM

From: Bev Buswell <bevwildflowers@gmail.com>
Sent: March 16, 2021 7:43 AM
To: PlanningAgency <PlanningAgency@sonoma-county.org>
Subject: cannabis hearing 3/18

EXTERNAL

Please accept my comments in lieu of speaking at the hearing.

I am in a somewhat unique position to comment as I:

- 1) owned a property rented to cannabis growers for 12 years, from 0 permit, to medical, to being turned down for a rec permit due for not meeting the stringent road, water, and septic requirements. I had to sell the property because I would have lost money if I didn't rent to growers. I also have a family member who grows.
- 2) have a degree in Environmental Studies and have been an environmental activist at many points in my life.
- 3) just closed my nature school I ran for 12 years, teaching kids to love nature and farming on land wedged between a (neighbors) large vineyard and a small cannabis grow.

I get it.

Your goal should be to create rules to balance, as best as possible:

1. Helping the small growers who were supporting their families for years to go legal. Allowing only limited large agricultural endeavors if they are owned locally.
2. Protecting the scenery of our county!!!!
3. Protecting the usability of parts of private and public land from their property line being too close to bustling industry, including light pollution!
4. Protecting our atmosphere and permanent blight by specifically prohibiting any deforestation for agricultural purposes of any kind !!!!!

The smell factor can be dismissed. That's protected in the farm ordinance. They can get over it or move. Cows are worse. Concerns about the sight of large outdoor grows can be dismissed. It's a vegetative agricultural product.

What is very different is the industrial look of indoor grows or light deprivation assisted grows by housing in greenhouses or hoop houses. This will hurt our county in tourism, and most of all, in taking away acres of beautiful farms or worse, our rolling bucolic hills that define our county, and

replacing them with man-made structures. This is NOT ok!

In the past, you've allowed deforestation for vineyards. Stop. We are in a climate emergency. If you pass a county ordinance that no agricultural endeavor remove any forest at all, that will help alot.

By going large in your plans, what you are doing is inviting outside corporations to put small growers out of business. About half of the parents in my school were growers. Since the rec law was defined in our county, many had to drop out of my school because their business was barely making it. Many didn't fit the law regarding roads, well, & septic, so they had to switch their medical grow to an illegal grow. What you do impacts families! Keep mega corporations out and take care of our residents instead by limiting the size. As far as impact on kids, we had to shoo them inside on "spray days" at the vineyard, and make sure that on our nature excursions we didn't get too close to the cannabis grow where an alarm would go off.

Distance to a school, home, or park is not a problem for outdoor grows without plastic or greenhouses, if 1) there is a large setback (maybe by % of property for small grows, who can make up for distance with dense vegetation planted at fenceline), 2) they don't spray chemicals, 2) no pollution, including light pollution!, is emitted, 5) the growers put up sufficient fencing so that instead of alarms or God forbid dogs or armed guards, there's simply no way for people to get close enough that the workers would be concerned. Fencing should allow a corridor for wildlife!! What we don't need is more restrictions on the movement of wildlife due to fencing. Fencing should have vegetation planted on the view side when close to other land. Bright lights should be prohibited. They can keep their grow safe by cameras and fencing. Hoop house, indoor grows, and greenhouse operations should be in industrial areas. It's industry and has an industrial look. To protect the livelihood of the small grower, you could allow say 1 acre /grower of hoop house, indoor grow, and greenhouse but include a property line setback (by % of land for very small growers) for blight.

Do not be enticed in your decision by filling your coffers with fees or by lobbying by the Farm Bureau who always stands on the side of large farming. Take care of the beauty of this county, the climate, and the long-time residents already here.

Thanks for your careful consideration.

With gratitude,

Bev

Bev Buswell
Sebastopol, CA
707-479-1052

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From: [Bill Krawetz](#)
To: [PlanningAgency](#); [Greg Carr](#); [Caitlin Cornwall](#); [Larry Reed](#); [Todd Tamura](#); [Gina Belforte](#); [Jacquelynn Ocana](#); [Jacquelynn Ocana](#); [Cameron Mauritson](#); [Pamela Davis](#)
Cc: [Cannabis](#)
Subject: Proposed Mitigated Negative Declaration for the Cannabis Land Use Ordinance and General Plan Amendments, and Draft Ordinance
Date: Tuesday, March 16, 2021 3:52:52 PM

EXTERNAL

March 16, 2021

To: Planning Commission and Permit Sonoma

Cannabis@sonoma-county.org

PlanningAgency@sonoma-county.org

Greg Carr, 1st District greg.carr@sonoma-county.org

Caitlin Cornwall, 1st District caitlin.cornwall@sonoma-county.org

Larry Reed, 2nd District larry.reed@sonoma-county.org

Todd Tamura, 2nd District todd.tamura@sonoma-county.org

Gina Belforte, 3rd District gina.belforte@sonoma-county.org

Jacquelynn Ocaña, 3rd District jacquelynn.ocana@sonoma-county.org

Cameron Mauritson, 4th District cameron.mauritson@sonoma-county.org

Pamela Davis, 5th District pamela.davis@sonoma-county.org

Re: Proposed Mitigated Negative Declaration for the Cannabis Land Use Ordinance and General Plan Amendments, and Draft Ordinance

On behalf of Gold Ridge Neighborhood Group, I am providing our observations of the process and providing recommended changes to the Cannabis Land Use Ordinance draft, and Mitigated Negative Declaration.

Phase 2 Process:

Page 5 of the "Planning Commission Staff Report 3/18/2021" correctly states a major goal of Phase 2 was to address neighborhood compatibility concerns. What is INCORRECTLY inferred is this was done through an extensive broad reaching public outreach process. For 2 years, there has been no such outreach! The Cannabis Advisory Group meetings which were dominated by Industry never reached out to the general public or proactively engaged the public. To say these CAG meetings somehow fulfilled the BOS requirement for public input is patently wrong.

To prove my point, I ask the staff and PC to point out the changes (or maybe just one change), that improves protection to the general public and surround neighborhood folks? What provisions have been added into this amendment to address neighborhood concerns and protect us?

Recommended Changes to the draft:

1. Parcel size: Consider the objective of this amendment is to cover only situations that are ministerial in nature in which the public will have no say. In these scenarios, we recommend increasing the minimum to 20 acres for ministerial applications. This size parcels provides a reasonable chance for a grower to set up operations far enough away from a neighbor, situated properly on the parcel to have minimal impacts on neighbors. There are 4,971 parcels that are qualified to grow cannabis in Sonoma County that are more than 20 acres and contain DA, LIA, LEA, or RRD zoning. This would provide significant opportunities for the Industry growers. Finally the BOS knew in 2019 when they adopted the 10 acres minimum, this still didn't address many situations on the ground, hence the request for a phase 2 look .
 - a. For any parcel that borders RR or AR, in water zones 3 or 4, or within 500 feet of a stream, would need a detailed review before allowing any cannabis
2. Setbacks: There is a 1000ft setback in place for "sensitive uses" define as Schools, Childcare facilities, Parks, and Bikeways. Since our children, grandparents, wives, and husbands will occupy both these "sensitive" locations as well as their homes, it makes NO SENSE that they should have less protection at home, where the spend far more time. The BOS saw the wisdom to increase the setbacks to 1,000ft for bikeways, the same setbacks are appropriate for the home. Should be 1,000 ft. everywhere.
3. Permit Length: The current draft provides a permit for 5 years. This too long! The County, growers, and neighbors need to be able to re-evaluate the impacts and adjust accordingly. A 1 year permit is plenty during this initiate rollout period
4. Home Values: Reporting on the effects of pot legalization on Colorado home prices, Realtor.com said, "homes within a half-mile of a marijuana business often have lower property value than homes in the same county that are farther out" and that "neighborhoods with grow houses are the least desirable, with an 8.4 percent price discount." What are the proposed regulations doing to protect my property value against this?

Finally, there is now pressure and urgency to push this amendment through (and without the upfront public outreach process promised). Let's take the time to get this right!

Thank you
Bill Krawetz
Gold Ridge Neighborhood Group.

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From: brenw357@aol.com
To: [Cannabis](#)
Subject: Marijuana Ordinance Letter
Date: Tuesday, March 16, 2021 10:29:13 AM

EXTERNAL

March 16, 2021

To Whom It May Concern,

In 2018, my family along with my three neighbors whom all reside on Herrerias Way in Petaluma, Ca was negatively impacted due to a large marijuana grow operation that was set up without our permission less than ½ a mile from our homes, near an Elementary School and across the street from a Church and Preschool. In the middle of beautiful vineyards lye, a 1-acre marijuana grow operation with a wooden fence that surrounded hundreds of white hoop houses. Our gorgeous seasonal changing vineyards that we had come to know as our backyard had become infiltrated. Regardless of whose home you were in, we all shared the same unsightly view. Not only were we subjected to looking at this new operation, but we also had to deal with heavy traffic coming and going from the location, noise issues as well as the horrific smell.

We also endured medical complications that arose from the grow being so close to our homes. I have asthma and chronic bronchial issues which became exacerbated from the fumes permeating from the marijuana. This required me to be placed on new medications including two different inhalers to help alleviate my symptoms. I could not go in my own backyard or use my swimming pool without becoming ill. My neighbors experienced medical issues as well. One neighbor was sent to the hospital after becoming ill from the stench that was invading her home daily. Another one of my neighbors has a family member who has Cystic Fibrosis and is on a ventilator to assist in his breathing. The grow operation caused him to develop severe phlegm causing his breathing tubes to become clogged. He was sent to the hospital several times due to this complication. This young man enjoyed going outside in his wheelchair and strolling up and down the street with his family but since the marijuana grow operation invaded our neighborhood, he was no longer able to do this.

Together, we would come to find out that this grow operation was illegally set up and that the proper permits for this grow operation were not completed. We then reached out to the Sonoma County Board of Supervisor for help on how to resolve this issue. I am sad to say that they were little to no help at all when it came to this matter. We would eventually as a group, hire an attorney to help us fight against this illegal marijuana grow operation and prevail against the perpetrator.

I find it extremely shameful that three years later the Sonoma County Board of Supervisors are continuing to support the marijuana grow industry in our County. The proposed marijuana ordinance that is being brought forth clearly shows that the Board has no respect for its community members or the environment. They are allowing permits to be obtained without public knowledge, removing all health, safety and nuisance protections, and giving permission for 10 acres grow sites all while retaining inadequate setbacks requirements.

Remember my neighbors and I fought against a 1 acre grow operation, imagine what the health conditions, noise, traffic, and other variables the community and our environment will have to endure if this ordinance passes. Stand up, fight for what is right and do not let the

Sonoma County Board of Supervisors get away harming Sonoma County or the amazing people who live here.

Respectfully, Brenda Ward

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From: [China Dusk](#)
To: [Susan Gorin](#); [David Rabbitt](#); [district3](#); [district4](#); [district5](#); [Greg Carr](#); [Larry Reed](#); [Gina Belforte](#); [Cameron Mauritsen](#); [Pamela Davis](#); [Cannabis](#)
Subject: Comments for the public record regarding final cannabis ordinance
Date: Tuesday, March 16, 2021 3:15:07 PM

EXTERNAL

We have been residents of Sonoma County for over 48 years. We settled here because of the county's rural character, scenic beauty and clean air, and it's environmentally friendly General Plan. We raised a family here. We are writing today to protest the premature adoption of a Cannabis Ordinance and Negative Environmental Mitigation Declaration. The following are our reasons.

- 1) It attempts to re-designate cannabis as a crop rather than a product thereby violating State law which states that cannabis is a product and not a crop and is not protected by the Right To Farm Law. It proposes inadequate setbacks in ecologically fragile areas.
- 2) It has removed from the proposed ordinance the wording, "The proposed amendments are necessary and desirable to protect the public health, safety and environmental resources, provide a consistent regulatory pathway for the cannabis industry consistent with state regulations, foster a healthy, diverse and economically viable cannabis industry that contributes to the local economy, and ensure that environmental, public health, safety and nuisance factors related to the cannabis industry are adequately addressed. Removing this is a failure of the public trust.
- 3) It fails to address legitimate neighborhood compatibility concerns and protections thereby exposing county residents to noise, light, odor, dust, and waste production which are injurious to their health and well-being.
- 4) It fails to protect a fire ravaged county by seeking to abandon the State's minimum road width thereby exposing county residents to increased fire danger with loss of life and property and overstretched county's firefighting resources.
- 5) It fails to address the concern regarding the expected increase in residential theft and violent crime and provide adequate protection to county residents.
- 6) It fails to protect groundwater aquifers from over pumping creating environmental harm including damage to vital wetlands and watersheds and potentially creating aquifer deserts.
- 7) It fails to require a CEQA for all commercial cannabis grows.
- 8) Proposed setbacks are inadequate and favor the cannabis industry over the public good.
- 9) It will allow hoop house construction to predominate with multiple yearly grows, taxing an already broken electrical grid, exponentially increasing water use for an already heavy water using product especially in a time of drought, contributing to light pollution over large areas of the county and failing to provide measures that require the cannabis industry to ecologically dispose of all plastic used and clean up abandoned sites.
- 10) Under consideration is the permitting of 65,000 acres of cannabis cultivation which we believe is a larger area than all of the vineyards in the county put together. Such massive production clearly disadvantages other agriculture mixed and mono crops by leaving them to compete for whatever water is left after cannabis cultivation pumps out whatever it can and it threatens the water supply of residents that rely on wells.
- 11) It proposes adoption of Part 2 of the Ordinance before inconsistencies in the document are addressed and cleaned up.
- 12) Instead of mitigating Climate Change it adds to it by allowing for the substantial increase of greenhouse gas emissions.
- 13) It has failed to include the public with its legitimate concerns in the on-going revision process choosing instead to hold a few last minute virtual town hall meetings after the fact disadvantaging particularly those members of the community that don't have the technical knowledge to enter their questions.

The residents of Sonoma County have a right to be upset with what appears to be an attempt by the Board of Supervisors to rush through a final Cannabis Ordinance and Negative Environmental Declaration over riding public concerns and giving them no recourse after the fact. Please enter our comments into the Public Record.

Thank you.

China Dusk and Steven Tierra

Graton

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From: [Christine Peterson](#)
To: [Cannabis](#)
Subject: Planning Commission Meeting 3/18/21
Date: Tuesday, March 16, 2021 6:12:18 AM

EXTERNAL

STAFF: PLEASE CONFIRM RECEIPT OF THIS EMAIL

To the Planning Commission of Sonoma County,

I would like to comment on the updates made to Chapter 38 of the County code.

SECURITY

Cannabis is a commodity. Just because it grown in the ground does not mean it is strictly agriculture. Commodities have the consequence of varying value. Cannabis proportionally is highly valued, hence the word security is called out in the new code. We aren't concerned about our welfare when living next to a vineyard. Cannabis is much, much more valuable than grapes and attracts the kind of attention that needs security. The existing homeowner should feel as secure on their property in future years as they did last year.

WATER USE

In the county, house water is most often sourced via a well. Allowing the interruption of the aquifer replenishment by allowing surface water to be redirected directly affects the value and lifestyle of the existing resident.

The Mark West Watershed is a state protected watershed. The water availability in the watershed is Class 3 and Class 4. Class 3 is Marginal Groundwater Availability. Class 4 is Low/High Variable Water Yield. I think we can all agree on what marginal means, and that history has shown us a consistent decline in water levels. The county acknowledges this by pursuing their own sustainable water plans. Our watershed is necessary for the repopulation of Coho Salmon and its habitat. The importance of this is evidenced by the combined efforts of the state, community and Fish and Game working together over many years.

The consequences for any overdraft is to be categorically "avoided". Who decides if it can't be avoided? What is the criteria? Too costly for the investors? Avoided is not strong enough.

What is the penalty? With an abundance of financial resources, fines are ineffective. Penalties need to deter the action in the first place. Permit suspension, a stop operating order, confiscation of product need to be the penalties.

The consequence of the drought in the Mark West Watershed was to restrict residents from watering their landscaping. It only applied to residents, not any businesses, in the watershed. Cannabis uses proportionally more water than residences, yet residents were forced to bear the cost of the drought by replacing their landscaping. In a drought, no one should be prioritized and allowed unfettered access to the shared aquifer.

The monitoring will be done by the Agriculture Commissioner on a yearly basis. Where is the effective budget increase to oversee these new entities?

OPERATING REQUIREMENTS

As you are reviewing previous tenets, it is not unreasonable to review them in light of updating consequences. Term limits should graduate from one year to three years.

You have acted with an abundance of caution in the past and you should continue to in the future.

SETBACKS

Sensitive uses, with a 1000' setback, need to include residences. Measurements from the residence instead of property line donate the resident's use of their property to the grower.

Thank you for considering these points.

Christine Peterson
5785 St. Helena Road, Santa Rosa
Dsinwrks@sonic.net
707-888-5273

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From: [Clayton Taylor](#)
To: [Cannabis](#)
Subject: Letter regarding proposed cannabis ordinance
Date: Tuesday, March 16, 2021 1:52:15 PM
Attachments: [WSSG Letter regarding SOCO Cannabis Ordinance Planning.pdf](#)

EXTERNAL

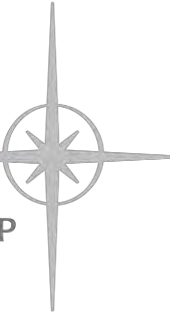
Please see attached letter supporting the ordinance but also suggesting changes for your consideration.

Regards,
Clayton
President
Whitestar Security Group
M: [\(707\)-736-6458](tel:(707)7366458)
O: [\(707\)-566-0100 Ext: 118](tel:(707)5660100)
C: [\(925\)-755-6629](tel:(925)7556629)



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Dear members of the Planning Commission,

I am writing today in regard to the proposed changes to cannabis regulations here in Sonoma County. I applaud you and your staff for taking the time to address concerns presented by legacy growers, and the greater community, to ensure that the process is both fair and supportive to our local cannabis industry and the farmers who support it.

As a security professional in the cannabis space, my specific concern is that most recent iteration of the proposed ordinance telegraphs to criminal elements cannabis security protocols. By outright banning the use of firearms through a County ordinance, criminals can rest assured that they will be met with little resistance should they choose to rob a cannabis business or cultivation site.

If the County of Sonoma is concerned about the safety of the employees on the site, they should remove this section from the ordinance and instead replace it with required standards for training of security personnel for these legitimate businesses. Within our organization, we require quarterly firearm training for all qualified staff. Additionally, we require all staff across the company to train in Trauma Informed Care principals and de-escalation training to avoid use of force. Beyond that we bring in world leading security professionals to assess sites and train staff to ensure we are able to operate at the highest degree. All of which meets or exceeds the standards set by the BSIS.

As a security professional I believe one of the best ways to make our community safer is to destigmatize cannabis and welcome it into society. The County has taken great strides to regulate cannabis like other businesses and yet most, if not all, are not subjected to these proposed heightened regulations creating burdens and disincentives to compliance. The safety of the industry and our communities will be greatly enhanced the sooner we bring legacy cannabis growers into compliance. The first step is to create an ordinance that welcomes ALL cannabis growers into the legal market and provides them the tools needed to safely stay in business.

Thank you for your consideration,

Clayton Taylor
President
Whitestar Security Group

From: [concerned citizens](#)
To: [Larry Reed](#); Todd.tamura@gmail.com; [Gina Belforte](#); [Greg Carr](#); [Caitlin Cornwall](#); [Pamela Davis](#); [John Lowry](#); [Cameron Mauritsen](#); [Jacquelyne Ocana](#); [Cannabis](#); [PlanningAgency](#)
Cc: [Susan Gorin](#); [David Rabbitt](#); courseyforsupervisor@gmail.com; [district4](#); [Lynda Hopkins](#); [Tennis Wick](#); [Scott Orr](#); [Christina Rivera](#); [McCall Miller](#); [Andrew Smith](#)
Subject: Transmittal Letter & comments on Draft documents
Date: Tuesday, March 16, 2021 11:39:13 AM
Attachments: [Site Plan copy.pdf](#)
[Residents of Bloomfield rev3.pdf](#)
[300" buffer map2.pdf](#)

EXTERNAL

Monday, March 15, 2021

From: Vi Strain for Concerned Citizens of Bloomfield
6330 Bloomfield Road
Bloomfield, CA 94952
vcrstrain@yahoo.com

Sonoma County Planning Commissioners and Staff,

Via email

Re: Draft Cannabis Ordinance Revisions, Draft General Plan Revision and Draft Subsequent Mitigated Negative Declaration.

Planning Commission Hearing scheduled for March 18, 2021

Dear Planning Commissioners and staff,

This letter is for submittal of the following:

Comments and recommendations from the Concerned Citizens of Bloomfield on the above referenced Draft Documents.

Let us begin by saying we are not opposed to cannabis. What we are opposed to is the lack of provisions in the above documents to provide the framework for a good neighbor policy between rural residents and commercial cannabis. Our comments on the above draft documents provide a residential community viewpoint on the protections expected for cannabis to be a good neighbor.

We respectfully request the Commission carefully consider our comments and recommend a full Environmental Impact Report be required to reevaluate the Chapter 38 Cannabis Ordinance relative to the newly adopted Chapter 26 zoning ordinance and the public comments submitted during this current process.

Sincerely,

Valorie Dallas, Diane Donovan, Veva Edelsen, Toby Levy and Vi Strain for
Concerned Citizens of Bloomfield

**BLOOMFIELD COMMENTS RE: DRAFT CHAPTER 38, SONOMA COUNTY
COMMERCIAL CANNABIS CULTIVATION IN AGRICULTURAL & RESOURCE
AREAS ORDINANCE AND GENERAL PLAN AMENDMENT**

Comments and Recommendations by Vi Strain on behalf of
Concerned Citizens of Bloomfield – ccobloomfield

Note: Recommendations are in **bold**

Article 02 General

38.02.020 Purpose

We are opposed to standards being applied by ministerial approval under the proposed Draft Subsequent mitigated Negative Declaration (DSMND).

Comment

Ministerial approval removes the ability of residential property owners adjacent to or in the vicinity of proposed cannabis cultivation to have meaningful input to local issues affecting residents and their property through public hearing and localized environmental review. The DSMND is not adequate to address the extent of significant and cumulative impacts normally achieved with an Environmental Impact Report (EIR) and leaves the County vulnerable to litigation as well as not protecting the health, safety and welfare of residential property owners. The fact that the County is allowing up to 10% of available agricultural and RRD zones of approximately 65,000 acres to be converted to outdoor cultivation through ministerial approval and without localized and specific environmental review is of a scale that defies wholesale mitigation. This is especially so in a County with such varied topography and conditions.

The change from a CUP to Ministerial approval gives undue authority to County Officials. There are numerous requirements in the process of approving cannabis cultivation that require discretionary decision-making as well as in implementing requirements of conditions on applicants that reasonably would require a Conditional Use Permit process. The great concern and impacts residents have identified to the Supervisors should make it clear more control needs to be exercised in identifying and mitigating the impacts of locating cannabis near rural communities. A CUP

allows differences in location and issues relative to each community to be considered individually.

We recommend Sonoma County conduct a full Environmental Impact Report to properly identify the impacts identified during the public comment period and as required by State law to mitigate the significant impacts of Commercial Cannabis Cultivation and then consider land use categories under which ministerial approval would be appropriate and where CUP's would apply.

Article 12 Standards for Commercial Cannabis Cultivation

Sec.38.12.030 Limitations on Canopy and Structures

A. Canopy Limitations

2. Existing Permanent Structures (recommended change in existing # 2.)

We propose reuse of an existing permanent Structure(s) be limited to what would be the allowed building square footage on property without an existing structure. The structure(s) use should be limited to the current operator on the property and not be sublet to other outside operators. If multiple buildings exist only one can be used for processing and must meet the size limitations of the subject parcel.

Comment

Reuse of existing outdated, abandoned buildings and outbuilding of larger size and coverage than the underlying property would allow under the cannabis ordinance should not be allowed. Reuse of any such abandoned buildings should also require meeting current building codes to provide safe working conditions for employees and operators.

B. Limit on New or Expanded Permanent Structures

We propose new building coverage for the purpose of or in support of commercial cannabis cultivation be reduced on parcels that are at least ten acres, but not more than 20 acres in size when adjacent to rural residential uses.

1. For a parcel that is at least ten acres, but no more than 20 acres in size, all new building coverage for the purpose of or in support of commercial cannabis cultivation cannot exceed **20,000 square feet (rather 43,560)** when located in close proximity to residentially dense areas such as unincorporated communities and neighborhoods in rural residentially zoned areas.

Comment

A building the size of an acre on a 10 or 20-acre parcel is out of scale and overwhelming when located in close proximity to residentially dense areas where industrial scale impacts are incompatible with said adjacent and surrounding residential use.

38.12.040 SETBACKS

We propose a buffer or Setback requirement relative to Rural, Unincorporated Communities and neighborhoods in Rural Residential zone districts as follows:

1. For a cultivation site with outdoor or hoop house cultivation, the cultivated area and any processing facility must be set back a minimum of 1000 feet and expanded a greater distance depending on locally prevailing conditions. The setback shall be from residential property lines in residentially dense areas such as unincorporated communities and neighborhoods in Rural Residential zone districts to the property lines of a cannabis cultivation site.

Comment

We believe the 1,000 foot setback is a minimum initial setback that can be expanded depending on localized environmental conditions and can be applied proportionally based on the density of rural residential properties and their environment. The current property line setback of 100 feet from the property line of the parcel on which the cannabis is cultivated and a minimum of 300 feet from residences where cannabis is cultivated is totally insufficient to protect the adjoining residential uses from cannabis cultivation impacts.

Through the SMND the County has recognized sensitive receptors, including children, the elderly and people in treatment facilities and yet seems to ignore residentially dense neighborhoods where families, including elderly and children, live day and night. Some residents care for their elderly in town rather than institutionalizing them and also care for individuals with medical conditions.

As an example of impacts on residents, In Bloomfield there is a cannabis cultivation proposal that includes a processing plant with attendant water tanks, parking and portable bathrooms 12,200 sq. ft. or .28 acre in size adjacent to multiple back and side yards. Using the 300 ft. set back from our homes to the facility means the processing plant would loom over our homes and property. Most of the adjoining homes, are 1000 to 2500 sq. Ft. There are also 20,000 sq. ft. of access roads; one road is adjacent to several back yards. Please imagine that in your back yard. See cannabis site plan and residential proximity

The enjoyment of our backyards would be so negatively affected as to be unusable. The processing plant has impacts similar to Industrial and Commercial use when considering the operating hours of 7 days a week, 24 hours a day, night lighting, security fencing and/or motion sensor night lights, audible alarms, security guards, air quality, water use, storage of hazardous materials, noise, odor, influxes of seasonal employees just to name the most concerning of impacts. How can these impacts on existing residential property owners possibly be considered mitigated and acceptable? In addition, considering the number of children in our community, it is of great concern that a cannabis operation is in our backyard. Olympia House, a treatment facility is visible from the proposed cannabis cultivation property. See

attached Residents of Bloomfield Map.

The 300' setback from the corner of a residence is in effect transferring the rights of the neighbor's property to the Commercial Cannabis Site. Every individual property owner is typically responsible to meet the requirements imposed by a development project on their own property. A neighboring property should not be burdened by the setbacks from a commercial cannabis operation next door. On the larger parcels in rural towns and neighborhoods a 300-foot setback would most likely occur within the adjoining neighbors property and would be a limit on the use of their property. This is a taking of property rights and we question the legality of the requirement. See attached 300' map relative to Bloomfield parcels.

The additional impacts of an inadequate setback/buffer that affect Bloomfield but are relevant to most other rural communities are summarized below:

Traffic on substandard community streets - The only access for the current proposal in Bloomfield is from a city street 10 ft. wide emptying into a street 12 ft. wide. Our substandard streets would be overwhelmed by hundreds of employees during harvest and visitors for events as well as daily operational traffic to the site. Residents use the streets for walking and visiting and we are also concerned about impaired drivers exiting from events on residential streets.

Public Safety - Emergency vehicles such as Fire trucks and vehicles cannot pass concurrently on any of our streets. Any emergencies, but especially fire events and Wildfire evacuations, would take much more time and place all residents and employees on the cannabis site in danger.

Odor - We could not find a provision in the ordinance that requires odor from an outdoor cultivation/hoop house be contained within parcel boundaries. The SMND has a provision that odor leaving the parcel is a major issue that must be prevented. Please either reinstate or add a provision that remedies this oversight and inconsistency with the environmental findings. We have been researching the odor issue and are extremely concerned when reading about not just the smell of cannabis but the Fog odor neutralizing aerosols that contain organic oils or oxidizing agents that have not been subject to long-term studies. Residents are the guinea pigs to see how these chemicals will affect us. A study by Ortech Environmental Consultants show "odor causing cannabis terpenes are detectable over 3000 ft. from the source". Bloomfield is directly downwind from the cannabis proposal and being in the Americano Estero, the wind blows constantly. This is another reason we have asked for a 1000 ft. setback/buffer and the allowance for a greater distance depending on locally prevailing conditions.

Hoop house electrical, plumbing and mechanical equipment – Allowing hoop houses to have facilities allows them to intensively function by enabling multiple crops and night operations. The increased impact during the day continuing into night is an unacceptable environmental impact on adjoining residential towns and neighborhoods. The revisions for night lighting loosened for security concerns, would allow a site to have night lighting at the growers option without consideration to the

impacts on adjoining residents. Impacts from night lighting would ruin the character of residential neighborhoods creating a nuisance and lack of enjoyment of night skies and significantly negatively impact wildlife.

Application of Setbacks – the issue that setback requirements do not apply in permit renewals if the cultivation site has not changed is another area that diminishes residential property rights next to cannabis cultivation. The 1000 ft. setback would resolve this issue.

In addition to the above setback from residential uses we propose adding a buffer/setback requirement relative to neighborhood and public use areas as follows:

2. For a cultivation site with outdoor or hoop house cultivation, the cultivated area and processing facility must be set back a minimum of 1000 feet from unincorporated Community Public Use areas such as a cemetery surrounded by a walking trail, park and/or any other public use area that is unfenced and open to the public. Any cultivation site should not be visible from the public use areas.

Comment

Bloomfield has a historic cemetery with a walking path around it, a park with restrooms, outdoor barbecue facilities and seating and a ball diamond all used by the community and the public. Other rural communities also have such facilities

Sec.38.12.030. Limitation on Canopy and Structures

Sec. 38.12.080. Fire Protection and Hazardous Material

Sec. 38.12.010. Design, Lighting, Security and Screening

Sec. 38.12.110. Air Quality, Odor, Noise, Occupational

Sec. 38.12.120. Waste Management

Sec. 38.12.140. Water Use

We believe the significant impacts of the cannabis operations, as described in the above sections, are incompatible with adjacent and surrounding residentially dense areas. We have earlier in this submittal made requests regarding structures under Sec.38.12.030 but believe processing structures and facilities should be located in zone districts able to accommodate the cumulative impacts of cannabis processing facilities. We propose cannabis processing facilities be removed from cultivation areas located adjacent to residentially dense areas as follows:

1. Cannabis Processing facilities must be located in Commercial or Industrial zone districts where adequate transportation systems are located and the 24-hour, 7 days a week operation, night lighting, hazardous material storage, noise, odor, Air quality, waste management, water use, high fencing, screening and security needs and other attendant operational issues are allowed and have no impacts on adjoining residential communities and neighborhoods.

Comments

Unincorporated communities and neighborhoods do not have adequate streets to handle the increased commercial traffic of cannabis processing. Also the increased traffic is detrimental to neighborhood use and safety and is not compatible with the residential density and use. The residential roads are also inadequate for fire access and two-way traffic in case of an emergency.

Requirements for high fences, locked gates and past experience in Sonoma County raises security concerns for residents adjoining cannabis cultivation sites. There have been reported home invasions of criminals looking for cannabis, one resulting in deaths. In Bloomfield there are multiple back yards adjoining a proposed cannabis operation making us vulnerable for criminals looking for access through adjoining private property to get to the cannabis operation. The residents adjoining the proposed cannabis operation all front on streets accessible to the public. Public safety resources cover a wide area and cannot always respond quickly to potential criminal activity that could affect the adjoining residential safety.

An addition, the draft ordinance seems to allow processing cannabis oils on site. Manufacture of this type should not be allowed due to the chemicals and process used. This type of processing should only be allowed with a CUP and Fire Marshal approval or prohibited except if located in a commercial zone district.

Sec.38.12.080 –Fire Protection and Hazardous Materials

We propose adding provisions to this section prohibiting cannabis cultivation projects from using unincorporated community and neighborhood roads that are substandard and do not meet Fire Safe Standards. The delivery and shipping traffic, employee traffic working 24 hours a day 7 days a week is commercial in scale and not compatible with residential neighborhoods. In emergencies, fire equipment and resident traffic cannot pass on the same street. The additional cannabis related traffic increases the impacts on residences.

We propose adding Wild Fire evacuation consideration to this section. Currently inadequate roads do not provide access to emergency fire equipment and community evacuation concurrently. When West County was evacuated during a wildfire event in past years, the Petaluma/Valley Ford Road and all roads entering this main road were often at a standstill and eventually barely moving. Horse trailer and evacuating residents were not able to safely evacuate even under the current conditions.

Article 14

38.14.020 Activities allowed with Ministerial Permit

F. Events.

We propose continuing the prohibition of events until such time as the cannabis industry shows it is self-regulating and can be an asset to the County

and a good neighbor to existing residential communities and neighborhoods. When events are allowed it should be considered only with a Conditional Use Permit to allow neighborhood input

Comments

Activities involving public access to the cannabis site, such as cultural events, special events, tours, tastings, and similar activities are another set of circumstances not compatible with residential health, safety and welfare. There are commercial venues for special events where there is adequate parking, access and facilities to accommodate crowds. Residential neighborhoods need to have protection from proliferation of these uses that are not compatible with residential values. The fact that the events are specifically to “taste” and/or consume a mind-altering product and then drive through a residential community upon leaving should in itself illustrate the negative impact.

Speaking specifically of Bloomfield, the roads are substandard and multiple residents share a property line with the proposed 12,200 sq. ft./28 acre service area, which includes a processing building, water tanks, parking, and portable bathrooms. The proposed processing building is likely where events would be held. As shown in the section under “Setbacks”, if existing setbacks were retained, many residents’ homes and backyards would be within 100 to 300 feet of these operations and their multiple uses. The impacts would affect the entire community as the size of the cannabis cultivation site overwhelms the size of the entire community as the attached maps illustrate.

The Olympia House Rehab Addiction Treatment Center is close to Bloomfield and is visible from the property proposed for Cannabis cultivation and processing. It’s ironic to think of a product being grown within walking distance of the Rehab Center that may be treating people with an addiction to said product.

Article 16 - Enforcement

A cannabis cultivation and processing operation adjacent to residential uses results in the adjoining residential residents becoming the monitoring and compliance agents to report violations. It is an unwanted burden to have to call or email a code complaint to the County. Currently in the County system there is no notice a complaint has been received and no follow-through on what has been done or not done. It is a job just to follow-through and monitor compliance with County Code violations and the resolution of complaints is seldom accomplished. If the County was staffed appropriately and responsive there might be a different attitude but long-term residents know how limited the enforcement process is and how much work it is to get follow-through. Having an enforcement section in the Ordinance does not assuage concerns about violations involving cannabis cultivation and processing. Current provisions are weak such as giving notice before inspection and lack of ability to terminate a license if there are multiple unresolved odor, noise or other serious complaints. **To be effective and responsive, the County must have an enforcement team dedicated to monitoring cannabis operations.**

Scenic Corridor

The Petaluma/Valley Ford Road providing access to Bloomfield and the West County area is a designated Scenic Corridor in Sonoma County. The Open Space & Resource Conservation Element contains objectives and policies “to provide guidelines so future land uses, development and roadway construction are compatible with the preservation of scenic values along designated scenic corridors”

The SMND, states that a use permit will be required if a permanent structure is visible from a scenic corridor. However Chapter 38 does not reference the Scenic Corridor. There isn't any requirement for hoop houses or permanent structures to be screened from public view, including from public parks, cemeteries or other common areas in a residential community. A provision needs to be added to protect the scenic qualities outlined in establishing the Scenic Corridor in the Americano Estero.

Hoop Houses - General

Hoop house are now allowed to have electrical, plumbing and mechanical equipment and are allowed to have mixed light cultivation, all of which are not allowed in the current ordinance. The impacts of this change are wide-ranging and significant yet were not analyzed or even shown in the SMND.

Impacts that were not addressed and/or mitigated in the revised cannabis ordinance are as follows:

Visual blight – plastic covered plastic pipe structures can cover up to 10% of a parcel allowing up to 10 acres of fully visible hoop houses under the new ordinance. The current ordinance requires all outdoor cultivation, which includes hoop houses be limited to one acre, not visible to the public. This is a significant change without proper evaluation and mitigation in the environmental documents. Our green rolling hillsides and valley areas have the potential to be covered with these unsightly structures. This change and the resulting proliferation of low rent hoop house construction will ruin the scenic value of Sonoma County enjoyed by residents and tourists alike. There are currently no provisions in the revised cannabis ordinance that prohibits this visual blight in the Scenic Corridor. **Prohibit cannabis hoop house use in any location that can be seen from a Scenic Corridor and require specifically that the provisions of the Counties Open Space & Resource Conservation Elements are applicable to Cannabis Cultivation.**

Resource Use – The changes in the cannabis ordinance allows multiple cannabis harvests a year on extensive acreage up to 10% of the parcel size. The added impact of increased energy use, higher water use and strong odors for up to 8 months a year are significant and yet were not analyzed in the SMND.

Plastic Pollution – The Acres of plastic and how it handled and discarded has not been reviewed for environmental impacts. Will it go to the landfill? Will it blow across

the hills and field and residential neighborhoods? Will wildlife ingest it and die? There are many unanswered questions about this polluting material. When considering Sonoma County has banned plastic grocery bags for environmental reasons and residents have switched to reusable bags it is totally incongruous that cannabis brings with it prodigious amounts of plastic that will cover many acres of Sonoma County. **Require cannabis applicants to develop a recycling and plastic management Plan to cleanup cultivation sites to prevent pollution of natural resources and reduce aesthetic blight**

Light Pollution - Although hoop houses are required to be covered there seems to be no real enforcement or incentive for growers to do so unless it meets their needs. It is important as there is a goal in the Open Space and Resource Conservation Element specifically addressing night lighting as follows: "Preserve and maintain view of the night time skies and visual character of urban, rural and natural areas, while allowing for nighttime lighting levels appropriate to the use and location. Lighting levels are recommended at the minimum necessary to preserve nighttime skies and the nighttime character of urban, rural and natural areas. There is a prohibition of continuous all night exterior lighting in rural areas, unless it is demonstrated to the decision making body that such lighting is necessary." **Tighten night light standards and be specific that it is not allowed unless approval is granted by the County office with the authority to make the decision.**

Increase in outdoor cultivation – The outdoor cultivation area has been increased up to 65,000 acres and that increase could result in all hoop house use. The low-rent hoop houses would be serving as greenhouses without the same structural and improvements standards or aesthetic appearance. There will be substantial increases in water and electrical use as well as increased odor generation. The environmental impacts of this significant increase from the existing ordinance has not been studied or mitigated in the environmental documents.

Increased fire danger – The changes from the existing ordinance to the revised ordinance under consideration is the installation of electrical, plumbing and mechanical equipment in hoop house as well their indoor and mixed light Hoop House cultivation. This change will use significant amounts of electricity and significantly increase fire hazards in rural areas. The over 8000 acres of new cultivation creates high-energy demands and subsequent significant fire hazard risks. There should be prohibition of indoor and mixed light cultivation in high fire risk areas, especially close to residentially dense area where a fire sweeping through plastic hoop houses could immolate a residential community located down wind of a cannabis site. Parking and travel areas on site should be hardened and dry grass and vegetation be properly maintained and mowed to prevent fire hazards. In addition, there should be best practices for owners and employees to raise awareness of fire hazards such as smoking on site. Probably a lost cause in a cannabis operation.

Chapter 26, Zoning Ordinance revision to sync with Chapter 38, Cannabis Ordinance

After hours of trying to reconcile how the cannabis ordinance was implemented in the Chapter 26, Zoning Ordinance, I read Sonia E. Taylor's letter and understood why

there were inconsistencies and mistakes and stopped my review. This processing antic is both amateurish and indefensible. The draft chapter 38 should be reevaluated relative to the new adopted Chapter 26 and the environmental impacts considered from this reevaluation.

Summary

An Environmental Impact Report is required to address the significant impacts of the extreme changes that will occur due to cannabis cultivation in Sonoma County as described in the above review of the draft cannabis ordinance. The significant impacts should minimally include neighborhood compatibility and setbacks to provide residential communities a buffer from cannabis operations, adequate road and fire safety provisions including wildfire and evacuation considerations, more in-depth analysis of water use, protection of scenic vistas and aesthetics of hoop house proliferation.

General Plan

The County has chosen to classify cannabis as an agricultural crop rather than be consistent with State cannabis policy classifying cannabis as a product or a commodity. The intent appears to include cannabis in the same category as other agricultural uses that provide and process food, fiber and plant materials.

This classification though does not take into account cannabis is unlike other agricultural uses. Rural residents Living in Sonoma County, adjacent to agriculture for many years, know agriculture and there is not any other operation we are aware of requiring a security plan (confidential) and requirements such as security fencing, motion sensor night lights, audible alarms potential security guards, guard dogs or drones monitoring perimeters (interfering with neighbors privacy) and checking an applicant for felony convictions.

Please take a step back and carefully consider the long-term impacts of such a major change in how County policy will play out into the future as is the intent of the General Plan. We know the affluent counties of Napa and Marin adjoining Sonoma County have elected to prohibit cannabis cultivation, not wanting to diminish their brands and in the case of Napa to share their storied terroir with cannabis. Sonoma County located between the Emerald Triangle, Napa and Marin and close to San Francisco, is electing to allow cannabis cultivation and as such is the focus of the budding cannabis industry.

Sonoma County has more assets than our adjoining counties with significant Pacific Ocean frontage and world-class parks and open space along the ocean corridor. We have world-class wineries and wine to rival Napa County. We have beautiful and diverse terrain from coastal prairie to redwood forests. Our view sheds are magnificent and well worth preserving.

Living in Bloomfield, we see the Petaluma/Valley Ford Road filled with Recreational

Vehicles and travelers flocking to the coast and it is well known how locals also enjoy the drive from the cities to the coast. The rolling hills and grazing cattle are a respite from city living and tight quarters. Even the marine layer and winds are an elemental balm to weary urbanites.

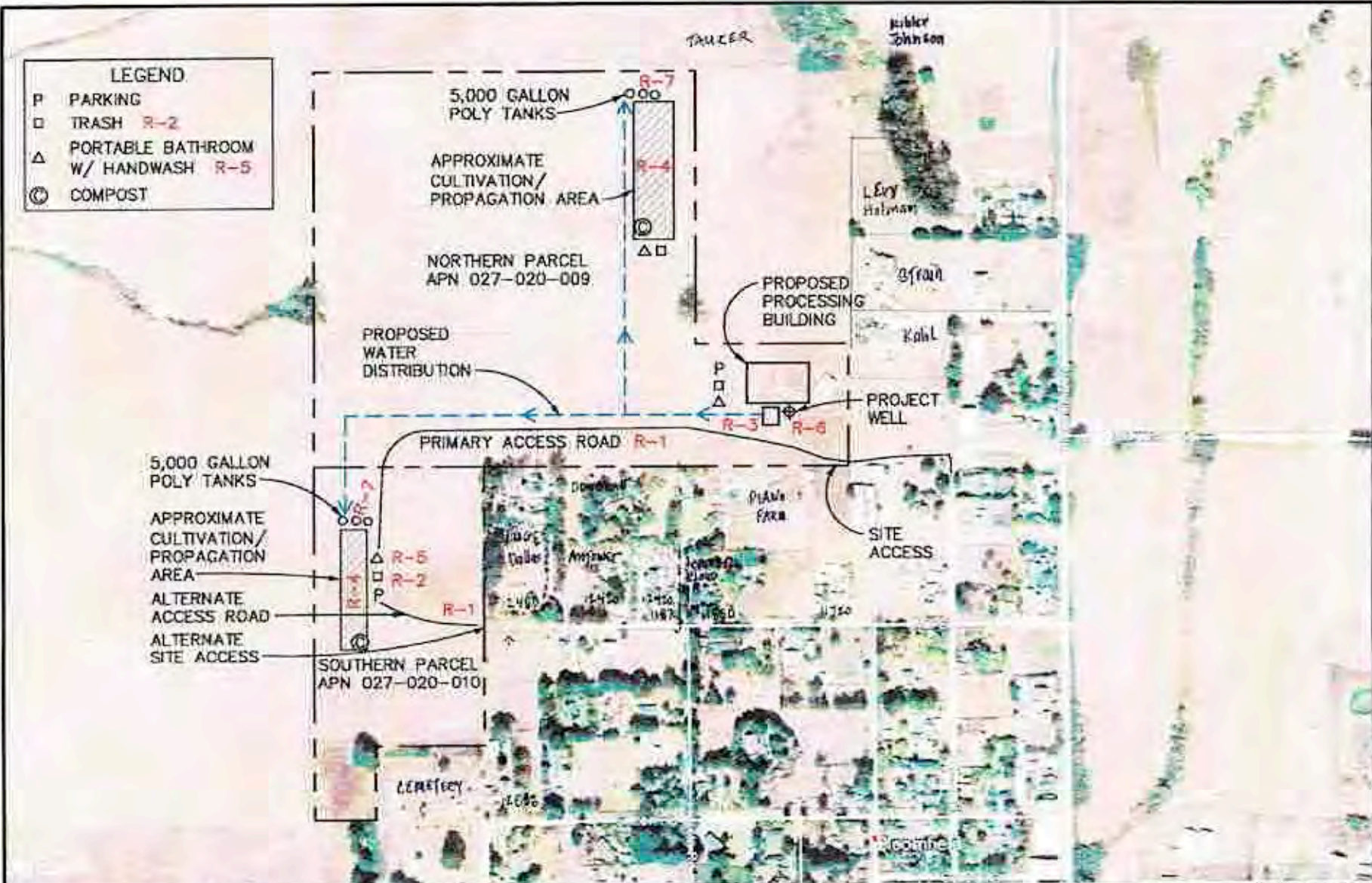
We urge you to carefully control cannabis proliferation so it is not a detriment to Sonoma County. The promise of proposed increased tax revenue could never offset the damage caused by insufficiently regulated cannabis proliferation. In closing, weigh the value of what we already have and could lose without careful and thoughtful land use planning decisions.

Thank you for your close attention to this important issue.

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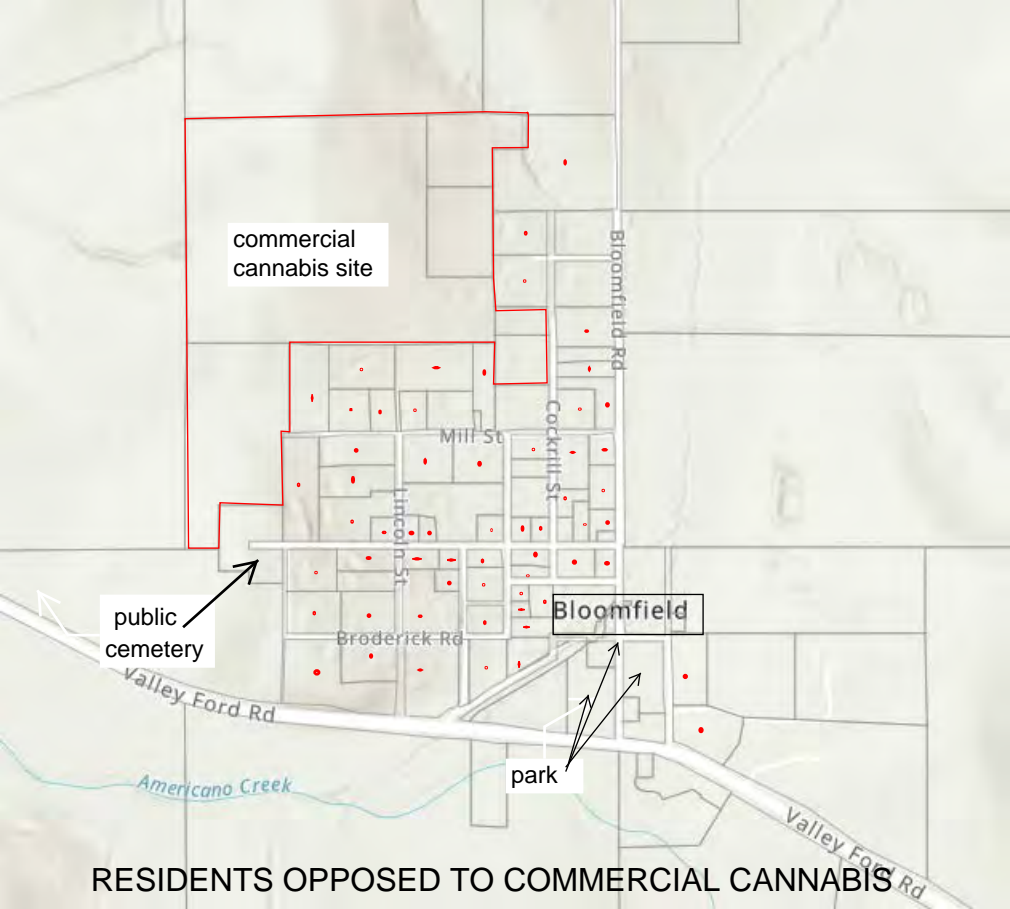


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 CA PG# 7573

SITE MANAGEMENT INSPECTION MAP

027-020-009 & 027-020-010
 6405 COCKRILL ST
 PETALUMA, CALIFORNIA 94952

JOB NUMBER: 5090.01
DATE: 12/8/20
PLATE: 2



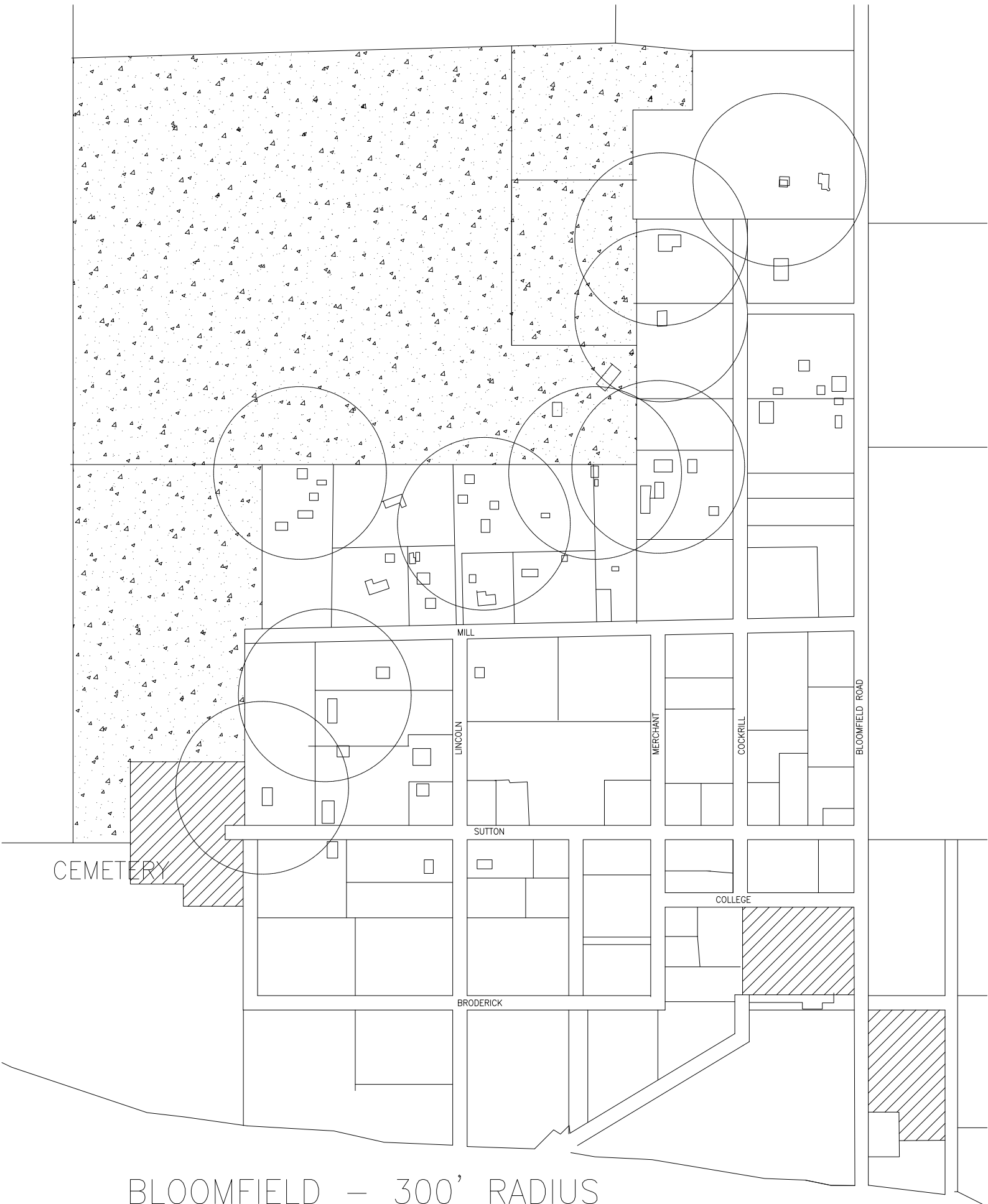
commercial
cannabis site

public
cemetery

Bloomfield

park

RESIDENTS OPPOSED TO COMMERCIAL CANNABIS



BLOOMFIELD — 300' RADIUS

From: [Don Pedrazzini](#)
To: [Cannabis](#); [Susan Gorin](#)
Subject: Objection to Marijuana
Date: Tuesday, March 16, 2021 7:49:36 PM
Attachments: [Marijuana Proposal.pdf](#)

EXTERNAL

Please see the attached document with our objection to the current, sometimes changing, Marijuana proposal.

Don & Cindy

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March 16, 2021

Re: Marijuana Proposal

Dear Planning Commissioners,

Please reject the proposed cannabis ordinance which would forever adversely impact the beauty, image, safety, value, and bucolic nature of Sonoma County's country side for residents and visitors alike. We have been a major tourist attraction for those wanting to experience the pristine nature of Sonoma known for the beautiful landscapes, vineyards, fresh air, and lovely inns and spas. I live off of Bennett Valley Road in Savannah Estates and during certain times of the year experience the most awful odor of skunk for the marijuana grows—many of which I believe are not legal. We have also felt safe and protected until the county let the homeless problem and cannabis grows get out of control. I would expect you to put the brakes on this proposal because of fire danger as well, having recently experienced two devastating fires. I simply don't understand this push for cannabis in light of all the other more important issues we have to deal with. Who is behind this and what is their agenda.

Whatever you hope to gain in revenue would be lost in a decline of property values and therefore your tax base, the higher caliber tourist trade of those who come to see the wine country; and we would become known in an unsavory way as has Humboldt County.

Thank you for your consideration,

Don and Cynthia Pedrazzini
2945 Wild Turkey Run
Santa Rosa, CA 95404

707-568-5852

Petaluma (Bloomfield), California, March 8, 2021

To all local officials and authorities concerned.....

We, David and Marta May, along with all the other 422 residents of the town of Bloomfield, ask our local officials to act responsibly in restricting Cannabis growing areas as to **not jeopardize the quality of living in Rural Residential neighborhoods such as ours.**

The legalization of Cannabis is a fact. The way the legalization is implemented is left to **the elected officials in the Counties and Cities. Please act responsibly!**

The industry has well-connected Sonoma County people in its leadership. Many "conflicts of interest" can be cited as related to people who are supposed to be protecting the interests and safety of Sonoma County's unincorporated small communities **who have only the County Board of Supervisors to protect their interests.** They will be held accountable! We do not have elected members or a Mayor.

We understand the Board of Supervisors is considering relaxing Cannabis grow regulations. We have read most the documents involved and **seriously object** to the new changes adversely impacting our town and our way of life. We, the citizens of Bloomfield request the Board of Supervisors instead develop a comprehensive plan on how small rural communities can be protected and continue to thrive as home to residents who value their rural location and want to protect their neighborhood **values and safety.** Our neighborhood is **not** compatible with the proposed new Cannabis development rules... *"sets objective standards for issuance of ministerial permits in those zones to protect public health, safety, and the environment and to promote neighborhood compatibility."*

Location, Zoning and Project Description:

The purchase of the Zimmerman Dairy at 6405/6410 Cockrill Street in Bloomfield by Petrichor Sungrown LLC brings with it the intention to commercially grow cannabis in our town, drill new wells, and construct new buildings to support this commercial endeavor.

The property parcels are:

027-100-025 (2.3 acres) / 027-100-026 (1.45 acres) / 027-020-007 (5.09 acres)
027-020-008 (5. acres) / 027-020-009 (51.4 acres) / 027-020-010 (16.01 acres)

The owners of such parcels propose to maintain a large (if allowed through the new rules) grow and development of cannabis cultivation...**right in the center of our town!**

How can anyone in good conscience allow such development?

How could the laws be altered in a manner as to **not protect** an entire residential town of 424 inhabitants?

WE can think of a few reasons not to allow any of it in our community.....

- 1) The parcels in question are in the center of our town. They were a dairy farm, but have been inactive for many years. Many **wild life species** have made their home within, and will be seriously impacted by the proposed grow.
- 2) Our cemetery, where the local pioneers are buried, is a **historic park**, and it is adjacent to the proposed growing area. **We are a historic Community!**
- 3) The people who have bought the land, desire to create a "**Cannabis Resort**" They intend to build **houses and swim pools** and create a "spa" where many strangers will invade our town. The **traffic** from the visitors as well as the trucks required for the operation will be horrific!
I quote.... *"clarify the relationship between the two chapters regarding local land use regulation of cannabis cultivation and supply chain business activity and when a discretionary use permit is required. The ordinance changes include the removal of the prohibition on tasting, promotional activities, and events related to commercial cannabis activities"* **Why destroy the safety of our town?**
- 4) Water: Bloomfield is in a marginal Zone 2 groundwater area, precludes large-scale commercial, water-intensive activities such as cannabis or vineyards. **Swim pools? Really?** It takes an extreme amount of water to bring each individual plant to maturity? **Grown water depletion and pollution** of our ground

water by the many **chemicals and pesticides** used to keep the plants safe from plague. 13 different pesticides are shown in the Site Management Plan. **This is a town of organic gardens.**

- 5) Not far from us, and in an area hit by our heavy winds, is **Olympia House, a recovery center**. It's also important to note, as it currently doesn't show on the county's Cannabis Site Evaluation map, that The Olympia House Alcohol Rehab and Drug Treatment Center at 11207 Valley Ford Rd is part of the Bloomfield Community, and cannabis grow is not compatible with a drug treatment center. The people that are there trying to cure their addiction will get "**Contact High**" The entire town of Bloomfield is downwind of the prevailing coastal winds that flow from the ocean down the lowlands of the Estero Americano. Any odors originating from the properties in question would quickly propagate through the entire area.
- 6) Our **air quality** will be seriously disturbed. Many of us are elderly and with our age come respiratory problems. Many of us walk daily. Why would anyone who is trying to **preserve a safe way of life** for our community allow our air quality to be ruined with the **perpetual smell of skunk** that accompanies such Cannabis growth operations?
- 7) Fire Safety and Road Access Concerns. The town of Bloomfield has narrow one-lane roads with no sidewalks. Two cars have to allow each other space to pass. When we walk, some of us with our children, stop to allow cars to pass us safely. The LEA parcels of the proposed commercial cannabis (grow) operation are surrounded by RR. There is no buffer; nor current access roads other than Mill Street and Cockrill Street. Access roads need to follow the existing ordinances for a commercial operation for both access and fire safety. We are far from any fire response team and /or/ ambulances. Our nearest volunteer fire station is approximately 4.6 miles and 6 minutes away. Our unincorporated town has no police department and depends on the Sonoma County Sheriff Patrol. Bloomfield is in Fire Zone 5, an area of 178 square miles. The town is downwind of the proposed site, with fire escape routes on the same one-lane roads that fire vehicles would need to use. The Sonoma County document located at www.sonomacounty.ca.gov, 'Cannabis Cultivation Within Resources And Rural Development Lands' studies key issues and policy options in rural (RR) areas such as ours. It notes that, "Although cannabis cultivation operations would have to obtain proper building and electrical permits, allowing cannabis in this area would increase the number of structures and people that would potentially need emergency protection." **SAFETY FIRST!**
- 8) The owners of the proposed development tell us they will be **active around the clock...24/7**. There is much **noise** as well as **light pollution** associated with such enterprise. Many of the residents of the town's back yards are adjacent to the operation.
- 9) The new owners of the land propose to guard their enterprise with "**drones**." What will they do to our town's rights to **privacy** and specially that of the adjacent residents?
- 10) Safety? Security? Many such operations are guarded by armed **guards**. **Crime** follows; Threat of **violent crimes**. With the wholesale price of cannabis ever increasing, our concerns are not only about our protection, but the storage of both cash and cannabis. **Are we to be condemned to such perils?**
- 11) A commercial enterprise of such magnitude in the middle of a residential town? Really? How can that be morally acceptable nor legal?

We, the citizens that reside in the community of Bloomfield, overwhelmingly oppose the proposed operation of parcels: 027-100-025 (2.3 acres) / 027-100-026 (1.45 acres) / 027-020-007 (5.09 acres) / 027-020-008 (5. acres) / 027-020-009 (51.4 acres) / 027-020-010 (16.01 acres) Address: 6405/6410 Cockrill Street in Bloomfield by Petrichor Sungrown LLC.

We believe cultivation as presently proposed should be evaluated on ALL SIX SITES, to assess their cumulative impact upon our community. No permit for a cannabis operation around and within our RR neighborhood should be granted. Cannabis cultivation should not be allowed to proliferate and/or be concentrated in the vicinity of communities. The zoning that allows this should be amended to reflect that this parcels are in the middle of an RR town. **We, the citizens that reside in the community of Bloomfield, overwhelmingly oppose** having a commercial cannabis operation located in the middle of our TOWN !!!!!!!!!!!!!!!

David and Marta May

From: [Chelsea Holup](#)
To: [Cannabis](#)
Subject: FW: HI from Erin Gore! / Cannabis Discussion?
Date: Tuesday, March 16, 2021 8:12:49 AM
Attachments: [Cannabis Feedback Proposed Changes EGore.pdf](#)

From: Erin Gore <erin@thegardensociety.com>
Sent: March 15, 2021 9:22 PM
To: Pamela Davis <p.davis479@gmail.com>
Cc: Scott Orr <Scott.Orr@sonoma-county.org>; Chelsea Holup <Chelsea.Holup@sonoma-county.org>
Subject: Re: HI from Erin Gore! / Cannabis Discussion?

EXTERNAL

Thanks Pam!

I have attached my feedback here for the Commissioners. I appreciate your attention to this matter.

All my best,
Erin



Erin Gore

Founder, CEO

mobile: 707-849-5483

office: 707-331-0136

email: erin@thegardensociety.com

website: www.thegardensociety.com

Garden Society is a California-based, cannabis-focused benefit corporation serving women in search of new, more holistic ways to renew and restore from the chaos of their daily lives. Garden Society creates artisanal edibles and sun-grown pre-rolls, made with uncompromising quality, that connect responsible farming, sustainable ingredients and strain-specific cannabis. Every product is lab tested all the way through the process—providing an expected experience, from the farm to your home.

[Where to Buy](#) | [Newsletter](#) | Read in [Forbes](#) how we've sheltered in the storm of Covid-19.



On Fri, Mar 12, 2021 at 12:18 PM Pamela Davis <p.davis479@gmail.com> wrote:

Hi Erin

Thank you for the email. I appreciate the offer to meet with me, however I would appreciate it if you would please submit your testimony in writing so that all the commissioners can have the benefit of your comments.

Thank you,
Pam Davis

On Fri, Mar 12, 2021, at 9:47 AM, Erin Gore wrote:

Hi Commissioner Davis!

My name is Erin Gore. I'm a local elected official here in Sonoma County (chair of Healdsburg district hospital) and also a cannabis operator (vertically licensed in Cloverdale) and female founder of [Garden Society!](#)

I'd love to have a call or coffee with you to discuss the pending cannabis ordinance discussion. I've done a lot of work with our industry on this policy and would love to make you aware of some of our concerns, the impact to the industry, and some viable solutions that are win/win for the community and the industry. I'd also be happy to answer any questions you have that would be helpful prior to the discussion at the planning commission.

Would you have time on Monday for a call? Please let me know what works well for you and I can adjust!

Thank you so much and enjoy the weekend ahead!
Erin



Erin Gore

Founder, CEO

mobile: 707-849-5483

office: 707-331-0136

email: erin@thegardensociety.com

website: www.thegardensociety.com

[Garden Society](#) is a California-based, cannabis-focused benefit corporation serving women in search of new, more holistic ways to renew and restore from the chaos of their daily lives. Garden Society creates artisanal edibles and sun-grown pre-rolls, made with uncompromising quality, that connect responsible farming, sustainable ingredients and strain-specific cannabis. Every product is lab tested all the way through the process—providing an expected experience, from the farm to your home.

[Where to Buy](#) | [Newsletter](#) | Read in [Forbes](#) how we've sheltered in the storm of Covid-19.



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3/13/21

Erin Gore

Old River Road Inc dba Garden Society
#C12-0000062-LIC
840 N Cloverdale Blvd,
Cloverdale, CA 95425

Dear Planning Commissioners,

Thank you for the opportunity to have an open discussion with you all about the recently proposed regulations from the County of Sonoma with regards to their proposed changes for cannabis cultivation across the county. Clearly, the County's first attempt to regulate cannabis cultivation failed because of onerous regulations and a convoluted permitting process. I support the efforts of the county to move cannabis cultivation out of Permit Sonoma and have it administered by the Ag Commissioner. While the proposed changes are a good start, they do not address some of the most pressing items needed to allow traditionally agricultural farms to enter the market and maximize their potential.

As a board member of the Cannabis Business Association of Sonoma County and licensed operator in Cloverdale, I believe that the ability for adults to safely experience the benefits of legalized cannabis is both important to the overall implementation of California's legalization of cannabis and a potentially critical revenue generator for the County, both for its tourism industry and its economic workforce development. As has been proven with wine, the ability for people to come to Sonoma County and experience its natural beauty while meeting the producers of that product and consuming it in that setting enables the County to effectively monetize the collective reputations of artisanal producers to the tune of hundreds of millions of dollars.

Cannabis provides a similar opportunity and is arguably of more interest to changing demographics who are focused on consuming less alcohol and living a health-conscious lifestyle. There are few other industries which have the potential to provide this type of economic opportunity to the County while also preserving our rural heritage. There are already laws at the State that protect and promote cannabis appellations due to consumer recognition of the importance of terroir.

Therefore, I have the following requests for immediate incorporation into the County's cannabis updates:



- 1) Land Use and Zoning Amendments for Retail- Zoning categories which allow for retail uses should be expanded to include the 4 types of agricultural zoning (LIA, LEA, RRD, DA) which currently allow for commercial cultivation. This would allow cultivators to create a “Direct to Consumer” retail experience with a conditional use permit. Currently retail in AG zones is unnecessarily prohibited.
- 2) On-Site Consumption- Already allowed under California law by Business and Professions Code §26200(g) at a licensed retail with a conditional use permit to create a “tasting room experience”. Currently on-site consumption is unnecessarily prohibited entirely in the County.
- 3) Lift Dispensary Caps- Outdated limitation of 9 dispensaries imposed by the County prior to legalization. We request that the County lift the cap on retail facilities and regulate retail as land use issue exclusively.

Second, as a current licensed operator and multi-generational farming family here in Sonoma County, I have a unique understanding of the impact onerous cannabis regulations have on practical farming practices. With this experience, and in consultation of many industry peers and work teams, I request the following changes be made to the proposed regulations as outlined on the recent public forums.

- 4) Remove Senseless Setbacks and align to State Law – Removing setback requirements when both parcels in question are commonly owned is another way to encourage thoughtful, environmentally responsible cultivation on larger agricultural properties. Many large farmlands are made up of multiple parcels and requiring setbacks to property lines in these cases achieves nothing other than inefficiencies. Cultivators should be encouraged to locate their cultivation sites in the areas of their property that are the least environmentally sensitive, present the best growing conditions, and are setback from real neighbors, and should not be limited by arbitrary setbacks when the adjoining parcels are commonly owned.
- 5) Remove Cultural Resource Survey – Delete this section completely. This regulation is onerous and will delay and possibly prevent cannabis cultivation. No other agriculture crop is required to do a Cultural Resource Survey. By including the words “involving ground disturbance” all forms of planting and soil preparation could be deemed ground disturbance. Under CEQA, any site development that requires a building permit will be tasked with doing a cultural survey. This process would be managed through Permit Sonoma who has staff versed on CEQA.



- 6) Energy Use – Delete this section completely. The requirement to have all 100% renewable energy source and the inability to use a generator will make it infeasible to have a cultivation site in the more remote areas of our County. Isn't this counterintuitive to what the NIMBYs and county officials want? Until the County has developed their Climate Action Plan and provided the infrastructure needed to have an on-grid 100% renewable energy source, there should be no requirements put on any small business to meet these demands. The inability to use generators for day-to-day operations as needed again flies against the desire to have cannabis grows in the unpopulated areas of our county. Many agriculture crops depend on generators for frost protection, irrigation, and other farming practices. An option could be to require whisper generators, noise reducing housing structures and/or propane generators depending on the concern with this power source.
- 7) Water Use – Delete this section completely. There are already local and state regulatory agencies that manage water use in our County. The California Sustainable Groundwater Management Act (SGMA) protects ground water and the State Water Board, through their regional offices have control over surface water use including streams, rivers, reservoirs, and ponds. Permit Sonoma has determined water scarce areas within our County and has regulations in place for these areas. The requirements from these water-centric regulatory agencies supersede anything the Ag Commissioner believes he can regulate.

Cannabis is having a national moment, with 36 states having some form of state cannabis legalization and full federal legalization on the horizon. California is the largest cannabis market in the world, with the reputation of growing the best cannabis in the world because of incredible genetics, the terroir of the land, and culture of cutting edge, modern products.

Cannabis will never replace the diversity of agriculture across Sonoma County that makes this one of the most beautiful terroirs in the world. Cannabis can, however, provide diversified revenue streams for farmers who have been severely impacted by droughts, fires, floods, freezes, and the pandemic. We see cannabis thriving in our ecosystem by bringing diversity, opportunity, and legacy for generations to come. Thank you for supporting sensible regulations in the County and taking a formal position against these items.

Warmest Regards,

Erin Gore

From: fjake@aol.com
To: [Cannabis](#)
Cc: David.Rabbitt@sonoma-county.org CCOBloomfield@gmail.com
Subject: part 2 cannabis ordinance
Date: Tuesday, March 16, 2021 10:14:11 AM

EXTERNAL

Dear Planning Commissioners,

I have been a resident in the town of Bloomfield for over 45 years. My neighbors and I are threatened by the possibility of a large cannabis grow/processing facility right in our neighborhood.

As you plan the second phase of the cannabis ordinance please consider the many citizens affected by its provisions.

*I think that all permits should be subject to an Environmental Impact Report.

*A 1,000 foot buffer zone from towns, neighborhoods, schools, parks, cemeteries and rehab centers should be mandatory.

*Any cannabis processing belongs in an industrial zoned area within city limits.

I am concerned about odor, noise, safety, groundwater use, chemical application, and traffic in our neighborhood. Your decisions are crucial to our friends and families.

Thank You,
Fred Jacobs

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From: [Teri Shore](#)
To: [PlanningAgency; Cannabis; SONOMAAG](#)
Subject: Cannabis Ordinance - PC Public Hearing - March 18 - No Grows in CS, EIR needed
Date: Tuesday, March 16, 2021 11:32:46 AM
Attachments: [Logo_PRIMARY_green_web_72dpi.png](#)
[GACannabisCSComments3.21.pdf](#)

EXTERNAL



March 16, 2021

Sonoma County Planning Commission
c/o Permit Sonoma
2550 Ventura Avenue
Santa Rosa, CA 95403-2859

VIA Email _____

RE: Cannabis Ordinance Amendments, General Plan Amendment and Mitigated Neg
Dec ORD20-0005 - Disallow Cannabis Grows in Community Separators to be consistent
with General Plan and Measure K; Require full EIR

Dear Sonoma County Planning Commission and Permit Sonoma,

Greenbelt Alliance urges the Planning Commission and Permit Sonoma to revise the proposed amendments to the Cannabis Ordinance and General Plan to specifically *disallow* cannabis grows in community separators, and/or to conduct a full environmental impact report to analyze and mitigate the impacts to voter-protected community separator lands and across the county. The 53,000 acres of lands designated in community separators are protected in General Plan policies and by the 83 percent of voters who supported Measure K from intensification of development without a vote of the people.

Cannabis grows in community separators were never considered, mentioned, or analyzed in the countywide General Plan, its Environmental Report (draft version 2006, FEIR not on record) or in Measure K. The Mitigated Negative Declaration does not analyze the impacts to community separators or even mention them. Changing the status of cannabis to an agricultural crop, rather than a product, with ministerial permits would open up community separators to a totally new, more intensive use of the lands and without any public notice, review or input.

Of significant concern is that community separators are the closest county lands to cities and towns and therefore neighborhoods, by design, to protect rural character and hold back sprawl. This elevates the potential negative environmental impacts to people living next to community separators compared to other lands. For example, the Buzzard's Gulch property next to the Cloverleaf Ranch for youth is RRD and located inside the Windsor-Larkfield-Santa Rosa Community Separator. In addition to a youth camp, the neighbors include a senior living center and a cancer treatment facility. The proposed ordinance would potentially allow a grow there with a ministerial permit and zero public notice. Voters vehemently objected to a proposed development there in 2020.

Most community separator lands are designated Resource and Rural Development or one of the various agricultural land use designations (LIA, LEA, DA, etc.). Existing agriculture

uses were considered generally consistent with the purpose of community separators. However, cannabis grows are significantly different and a more intense use of the land given the typical use and need for permanent greenhouses, hoop houses with artificial lighting capability, 8' solid security fencing, night and other lighting, structures with an industrial appearance, events, and potentially armed security around the clock.

Given these realities, Greenbelt Alliance urges the Planning Commission to disallow cannabis grows in community separator lands. We also urge you to require a full Environmental Impact Report to consider the negative environmental impacts of cannabis grows in community separators and lands across the county before moving forward on the Cannabis Ordinance and General Plan amendments.

Please refer to detailed letters from Sonia E. Taylor and Preserve Rural Sonoma County that provide additional comments and rationale for requiring a full EIR under CEQA. Greenbelt Alliance supports their comments and proposed actions.

Sincerely yours,



Teri Shore, Advocacy Director
tshore@greenbelt.org, 707 934 7081

cc: Sonoma County Board of Supervisors

--

Teri Shore
Advocacy Director

Greenbelt Alliance
1 (707) 934-7081 cell | tshore@greenbelt.org
greenbelt.org | [Facebook](#) | [Instagram](#) | [Twitter](#)

We're adapting to a changing climate. Get our new [Strategic Plan](#) to find out how.

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March 16, 2021

Sonoma County Planning Commission
c/o Permit Sonoma
2550 Ventura Avenue
Santa Rosa, CA 95403-2859

VIA Email PlanningAgency@sonoma-county.org

RE: Cannabis Ordinance Amendments, General Plan Amendment and Mitigated Neg Dec ORD20-0005 - Disallow Cannabis Grows in Community Separators to be consistent with General Plan and Measure K; Require full EIR

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Please see detailed letters from Sonia E. Taylor and Preserve Rural Sonoma County that provide additional comments and rationale for requiring a full EIR under CEQA. Greenbelt Alliance supports



their comments and proposed actions.

Sincerely yours,

Teri Shore, Advocacy Director
tshore@greenbelt.org, 707 934 7081

cc: Sonoma County Board of Supervisors

From: [Herman Hernandez](#)
To: [Cannabis](#)
Cc: [Craig Litwin](#)
Subject: Letters of Support For Cannabis Ordinance Part 1
Date: Tuesday, March 16, 2021 6:18:58 AM
Attachments: [Adam Sullivan - Letter of Support.docx.pdf](#)
[Alfredo Martinez - Spanish Workers SL - Urgency and Gratitude.docx.pdf](#)
[Ally Castro - Spanish LoS - Original Version.docx.pdf](#)
[Annabelly Solorzano - Spanish Workers SL - Urgency and Gratitude.docx.pdf](#)
[Anthony Orozco - Letter of Support](#)
[Antonio Zambrano - Letter of Support.docx.pdf](#)
[Benjamin Martinez - Spanish LoS - Original Version.docx.pdf](#)
[Bradley Reese - Letter of Support.docx.pdf](#)
[Constance Kullberg - Letter of Support.docx.pdf](#)
[David Yang - Letter of Support.docx.pdf](#)

EXTERNAL

Hello County Board of Supervisors, Commissioners and Staff,

Thank you for all the work you have invested into the revision of the County's Cannabis Ordinance. We appreciated the opportunity to provide feedback at last week's virtual town hall series, as well as your consistent communication on the matter. We look forward to continuing to work and support your efforts to make the ordinance work best for all stakeholders involved.

On behalf of clients, industry workers, industry leaders and community members, we are submitting 53 letters in support of the cannabis revision. Due to the size of the pdf's I will need to submit to you in 4 emails. Attached you will find 10 letters of support for the cannabis revision.

Respectfully,



Herman G. Hernandez
PUBLIC AFFAIRS STRATEGIST
421 Group
c (707) 287-6698
o (707) 861-8421
herman.hernandez@421.group

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From: [Herman Hernandez](#)
To: [Cannabis](#)
Cc: [Craig Litwin](#)
Subject: Letters of Support For Cannabis Ordinance Part 2
Date: Tuesday, March 16, 2021 6:19:15 AM
Attachments: [Dominic R Robertson - Urgency and Gratitude.docx.pdf](#)
[Efrain Gonzales - Spanish Workers LS - Staggered Harvest.docx.pdf](#)
[Fernando Martinez - Spanish LoS - Original Version.docx.pdf](#)
[Florencio Calihua - Spanish LoS - Original Version.docx.pdf](#)
[German Flores - Spanish LoS - Original Version.docx.pdf](#)
[Greg Brown - Letter of Support.docx.pdf](#)
[Heinrich Badenhorst - Letter of Support](#)
[Herman J. Hernandez - Letter of Support](#)
[Hilario Garcia Sanchez - Spanish Workers LS - Staggered Harvest.docx.pdf](#)
[Ignacio Reyes- Spanish Workers SL - Urgency and Gratitude.docx.pdf](#)

EXTERNAL

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Herman G. Hernandez
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c (707) 287-6698
o (707) 861-8421
herman.hernandez@421.group

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From: [Herman Hernandez](#)
To: [Cannabis](#)
Cc: [Craig Litwin](#)
Subject: Letters of Support For Cannabis Ordinance Part 3
Date: Tuesday, March 16, 2021 6:19:24 AM
Attachments: [Jeffrey B Schween - Letter of Support.docx.pdf](#)
[Jon Pronzini - Letter of Support.docx.pdf](#)
[Jonah Raskins - Hoop Houses](#)
[Jordan Richardson - Letter of Support](#)
[Jose Franco Bonilla - Spanish Workers SL - Urgency and Gratitude.docx.pdf](#)
[Jose Wagner Alava - Letter of Support.docx.pdf](#)
[Juan Reyes- Spanish LoS - Original Version.docx.pdf](#)
[Justin Manns - Letter of Support.docx.pdf](#)
[Justin Taylor Delong - Letter of Support.docx.pdf](#)
[Kiera Christopherson - Staggered Harvest.docx.pdf](#)

EXTERNAL

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Respectfully,



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From: [Herman Hernandez](#)
To: [Cannabis](#)
Cc: [Craig Litwin](#)
Subject: Letters of Support For Cannabis Ordinance Part 4
Date: Tuesday, March 16, 2021 6:19:36 AM
Attachments: [Moises Garcia - Spanish Workers SL - Urgency and Gratitude.docx.pdf](#)
[Morena Pacas - Spanish Workers SL - Urgency and Gratitude.docx.pdf](#)
[Oscar Gil Toribio - Spanish Workers SL - Urgency and Gratitude.docx.pdf](#)
[Rima Munoz Zambrano - Spanish LoS - Original Version.docx.pdf](#)
[Robert Weaver - Letter of Support.docx.pdf](#)
[Sofia Glorio - Letter of Support.docx.pdf](#)
[Teodulo Martinez - Spanish Workers LS - Staggered Harvest.docx.pdf](#)
[Thomas P Altenreuther - Letter of Support.docx.pdf](#)
[Tony Yang - Letter of Support.docx.pdf](#)
[Travis Vargness - LoS](#)
[Uriel Sanchez - Spanish Workers SL - Urgency and Gratitude.docx.pdf](#)
[Victor Gonzales - Spanish Workers SL - Urgency and Gratitude.docx.pdf](#)
[Vidal Castro - Letter of Support.docx.pdf](#)

EXTERNAL

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Respectfully,



Herman G. Hernandez
PUBLIC AFFAIRS STRATEGIST

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c (707) 287-6698

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herman.hernandez@421.group

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March 1, 2021

Sonoma County Board of Supervisors

575 Administration Dr #102A

Administration Building

Santa Rosa, CA 95403

Dear PRMD & Sonoma County Supervisors,

My name is Adam Sullivan, and I am writing to express my support for the increase in land use for cannabis cultivation in the new draft cannabis ordinance. By increasing the percentage of land use on properties for cultivation purposes, this will increase the jobs available for the people of Sonoma County. The cannabis industry has provided great working conditions and extremely competitive hourly rates for ag workers like myself and has helped us maintain during a global pandemic. Thank you for your consideration.

Thank You,

Adam Sullivan

5355 Skylane Blvd. Ste. A Santa Rosa, CA 95403

[ENGLISH BELOW]

26 de febrero de 2021

Sonoma County Board of Supervisors
575 Administration Dr #102A
Administration Building
Santa Rosa, CA 95403

Estimado PRMD y Supervisores del condado de sonoma,

Mi nombre es Alfredo Martinez, y le escribo para expresar mi apoyo a la revisión de la ordenanza de cannabis. Como empleado de la industria del cannabis, sé lo importante que es la revisión de la ordenanza del cannabis y el impacto positivo que puede tener en nuestra economía y comunidad locales. ¡Nuestra economía lo necesita! La industria del cannabis ha proporcionado condiciones excelentes de trabajo y tarifas por hora extremadamente competitivas para trabajadores como yo y nos ha ayudado a mantenernos durante una pandemia mundial. Por favor apoye esta ordenanza y gracias por su consideración.

Atentamente,

Alfredo Martinez
Bakersfield, CA 93305

February 26, 2021

Sonoma County Board of Supervisors

575 Administration Dr #102A

Administration Building

Santa Rosa, CA 95403

Dear PRMD & Sonoma County Supervisors,

My name is Alfredo Martinez, and I am writing to express my support for the revised cannabis ordinance. As an employee in the cannabis industry I know how important the The cannabis ordinance revision is and the positive impact it can have on our local economy and community. Our economy needs it! The cannabis industry has provided great working conditions and extremely competitive hourly rates for workers like myself and has helped us maintain during a global pandemic. Please support this ordinance and thank you for your consideration.

Respectfully,

Alfredo Martinez

Bakersfield, CA 93305

[ENGLISH BELOW]

26 de febrero de 2021

Sonoma County Board of Supervisors

575 Administration Dr #102A

Administration Building

Santa Rosa, CA 95403

Estimado PRMD y Supervisores del condado de sonoma,

Mi nombre es Ally Castro y le escribo para expresar mi apoyo al aumento del uso de la tierra para el cultivo de cannabis en la nueva revisión de la ordenanza del cannabis. Al aumentar el porcentaje de uso de la tierra en las propiedades con fines de cultivo, esto aumentará los puestos de trabajo disponibles para la gente del condado de Sonoma. La industria del cannabis ha proporcionado excelentes condiciones de trabajo y tarifas por hora extremadamente competitivas para los trabajadores como yo, y nos ha ayudado a mantenernos durante una pandemia mundial.

Atentamente,

Ally Castro
Santa Rosa, CA 95407

February 5, 2021

Sonoma County Board of Supervisors

575 Administration Dr #102A

Administration Building

Santa Rosa, CA 95403

Dear PRMD & Sonoma County Supervisors,

My name is Ally Castro, and I am writing to express my support for the increase in land use for cannabis cultivation in the new draft cannabis ordinance. By increasing the percentage of land use on properties for cultivation purposes, this will increase the jobs available for the people of Sonoma County. The cannabis industry has provided great working conditions and extremely competitive hourly rates for ag workers like myself and has helped us maintain during a global pandemic.

Respectfully,

Ally Castro

Santa Rosa, CA 95407

[ENGLISH BELOW]

26 de febrero de 2021

Sonoma County Board of Supervisors
575 Administration Dr #102A
Administration Building
Santa Rosa, CA 95403

Estimado PRMD y Supervisores del condado de sonoma,

Mi nombre es Annabelly Solorzano, y le escribo para expresar mi apoyo a la revisión de la ordenanza de cannabis. Como empleado de la industria del cannabis, sé lo importante que es la revisión de la ordenanza del cannabis y el impacto positivo que puede tener en nuestra economía y comunidad locales. ¡Nuestra economía lo necesita! La industria del cannabis ha proporcionado condiciones excelentes de trabajo y tarifas por hora extremadamente competitivas para trabajadores como yo y nos ha ayudado a mantenernos durante una pandemia mundial. Por favor apoye esta ordenanza y gracias por su consideración.

Atentamente,

Annabelly Solorzano
Santa Rosa, CA 95403

February 26, 2021

Sonoma County Board of Supervisors

575 Administration Dr #102A

Administration Building

Santa Rosa, CA 95403

Dear PRMD & Sonoma County Supervisors,

My name is Annabelly Solorzano, and I am writing to express my support for the revised cannabis ordinance. As an employee in the cannabis industry I know how important the The cannabis ordinance revision is and the positive impact it can have on our local economy and community. Our economy needs it! The cannabis industry has provided great working conditions and extremely competitive hourly rates for workers like myself and has helped us maintain during a global pandemic. Please support this ordinance and thank you for your consideration.

Respectfully,

Annabelly Solorzano

Santa Rosa, CA 95403

March 1, 2021

Sonoma County Board of Supervisors

575 Administration Dr #102A

Administration Building

Santa Rosa, CA 95403

Dear PRMD & Sonoma County Supervisors,

My name is Anthony Orozco, and I am writing to express my support for the increase in land use for cannabis cultivation in the new draft cannabis ordinance. By increasing the percentage of land use on properties for cultivation purposes, this will increase the jobs available for the people of Sonoma County. The cannabis industry has provided great working conditions and extremely competitive hourly rates for ag workers like myself and has helped us maintain during a global pandemic.

Cannabis is alternative medicine that has not only helped me greatly, but I have witnessed how it helped other patients. It has been my saving grace in an industry that is extremely stressful. Between the long days and inconsistent hours, cannabis gets me through my days and nights! Elyon provides a quality product that I standby and would like to see grow so others can share similar successes away from big pharma.

Thank You,

Anthony Orozco

djvip510@gmail.com

741 N Via Barolo

March 1, 2021

Sonoma County Board of Supervisors

575 Administration Dr #102A

Administration Building

Santa Rosa, CA 95403

Dear PRMD & Sonoma County Supervisors,

My name is Antonio Zambrano, and I am writing to express my support for the increase in land use for cannabis cultivation in the new draft cannabis ordinance. By increasing the percentage of land use on properties for cultivation purposes, this will increase the jobs available for the people of Sonoma County. The cannabis industry has provided great working conditions and extremely competitive hourly rates for ag workers like myself and has helped us maintain during a global pandemic. Thank you for your consideration.

Thank You,

Antonio Zambrano

1167 Mark West Springs Rd, Santa Rosa, CA 95404

[ENGLISH BELOW]

26 de febrero de 2021

Sonoma County Board of Supervisors

575 Administration Dr #102A

Administration Building

Santa Rosa, CA 95403

Estimado PRMD y Supervisores del condado de sonoma,

Mi nombre es Benjamin Martinez y le escribo para expresar mi apoyo al aumento del uso de la tierra para el cultivo de cannabis en la nueva revisión de la ordenanza del cannabis. Al aumentar el porcentaje de uso de la tierra en las propiedades con fines de cultivo, esto aumentará los puestos de trabajo disponibles para la gente del condado de Sonoma. La industria del cannabis ha proporcionado excelentes condiciones de trabajo y tarifas por hora extremadamente competitivas para los trabajadores como yo, y nos ha ayudado a mantenernos durante una pandemia mundial.

Atentamente,

Benjamin Martinez
Lamont, CA 93241

February 5, 2021

Sonoma County Board of Supervisors

575 Administration Dr #102A

Administration Building

Santa Rosa, CA 95403

Dear PRMD & Sonoma County Supervisors,

My name is Benjamin Martinez, and I am writing to express my support for the increase in land use for cannabis cultivation in the new draft cannabis ordinance. By increasing the percentage of land use on properties for cultivation purposes, this will increase the jobs available for the people of Sonoma County. The cannabis industry has provided great working conditions and extremely competitive hourly rates for ag workers like myself and has helped us maintain during a global pandemic.

Respectfully,

Benjamin Martinez

Lamont, CA 93241

February 5, 2021

Sonoma County Board of Supervisors

575 Administration Dr #102A

Administration Building

Santa Rosa, CA 95403

Dear PRMD & Sonoma County Supervisors,

My name is Bradley Reese, and I am writing to express my support for the newly drafted cannabis ordinance. There are so many positives that the cannabis industry brings to Sonoma County every month of the year, especially allowing hoop houses that create for staggered harvests, which maintain consistent jobs year round and consistent revenues. This is a critical element to ensure success of our local economy. This ordinance proposal is important to those of us who are employed by the industry because we know the economic benefits are going to bring all of us. Please support the ordinance and thank you for your time.

Respectfully,

Bradley Reese

5355 Skylane Blvd, Santa Rosa, CA 95403

March 1, 2021

Sonoma County Board of Supervisors

575 Administration Dr #102A

Administration Building

Santa Rosa, CA 95403

Dear PRMD & Sonoma County Supervisors,

I am writing to express my support for the cultivation of cannabis and clustering of properties such as mine. Clustering of farming operations allows for better operation's management.

Benefits include reduced fuel and travel expenses, more sustainable labor resource management capabilities, as well as better product provenance connection to the Sonoma County appellation or growing site. Clustering is the environmentally and economically superior policy. Given the sustainable farming movement in Sonoma County, cannabis farming should be viewed and treated similarly to Sonoma County vineyard operators clustering their vineyard operations within a specific appellation for better economic sustainability.

Thank You,

Constance Kullberg

1066 Stage Gulch, Petaluma, CA 94954

1901 Page Street, San Francisco, CA 94117

March 1, 2021

Sonoma County Board of Supervisors

575 Administration Dr #102A

Administration Building

Santa Rosa, CA 95403

Dear PRMD & Sonoma County Supervisors,

I am writing to you today in regards to the topic of clustering when it comes to parcels.

Clustering allows better facility design. Many farmers and ranchers would like to set up their operations further away from public view in unused space on their properties, however having to meet 100' setbacks from their own abutting property often pushes them to setting up operations that are not in the most favored area. Clustering will make the application review process more efficient. An owner would be able to submit one application for all of their abutting parcels rather than having to submit one for each parcel, saving the applicant, government, and public time.

Thank You,

David Yang

5355 Skylane Blvd Santa Rosa, CA 95403

March 5, 2021

Sonoma County Board of Supervisors

575 Administration Dr #102A

Administration Building

Santa Rosa, CA 95403

Dear PRMD & Sonoma County Supervisors,

My name is Dominic R Robertson, and I am writing to express my support for the revised cannabis ordinance. As an employee in the cannabis industry I know how important the cannabis ordinance revision is and the positive impact it can have on our local economy and community. Our economy needs it! The cannabis industry has provided great working conditions and extremely competitive hourly rates for workers like myself and has helped us maintain during a global pandemic. Please support this ordinance and thank you for your consideration.

Respectfully,

Dominic R Robertson

dom@elyoncannabis.com

310 Elbridge Ave Cloverdale, CA 95425

[ENGLISH BELOW]

26 de febrero de 2021

Sonoma County Board of Supervisors

575 Administration Dr #102A

Administration Building

Santa Rosa, CA 95403

Estimado PRMD y Supervisores del condado de sonoma,

Mi nombre es Efrain Gonzales y le escribo para expresar mi apoyo a la nueva ordenanza del cannabis. Hay tantos aspectos positivos que la industria del cannabis aporta al condado de Sonoma, especialmente al permitir casas de haro que se crean para cosechas escalonadas, y mantienen trabajo e ingresos constante durante todo el año. Este es un elemento crítico para asegurar el éxito de nuestra economía local. Esta revisión de la ordenanza es importante para nosotros que somos empleados de la industria porque sabemos que los beneficios económicos que nos traerá. Por favor apoye la ordenanza y gracias por su tiempo.

Atentamente,

Efrain Gonzales
Bakersfield, CA 93305

February 26, 2021

Sonoma County Board of Supervisors

575 Administration Dr #102A

Administration Building

Santa Rosa, CA 95403

Dear PRMD & Sonoma County Supervisors,

My name is Efrain Gonzales, and I am writing to express my support for the newly drafted cannabis ordinance. There are so many positives that the cannabis industry brings to Sonoma County every month of the year, especially allowing hoop houses that create for staggered harvests, which maintain consistent jobs year round and consistent revenues. This is a critical element to ensure success of our local economy. This ordinance proposal is important to those of us who are employed by the industry because we know the economic benefits are going to bring all of us. Please support the ordinance and thank you for your time.

Respectfully,

Efrain Gonzales

Bakersfield, CA 93305

[ENGLISH BELOW]

26 de febrero de 2021

Sonoma County Board of Supervisors

575 Administration Dr #102A

Administration Building

Santa Rosa, CA 95403

Estimado PRMD y Supervisores del condado de sonoma,

Mi nombre es Fernando Martinez y le escribo para expresar mi apoyo al aumento del uso de la tierra para el cultivo de cannabis en la nueva revisión de la ordenanza del cannabis. Al aumentar el porcentaje de uso de la tierra en las propiedades con fines de cultivo, esto aumentará los puestos de trabajo disponibles para la gente del condado de Sonoma. La industria del cannabis ha proporcionado excelentes condiciones de trabajo y tarifas por hora extremadamente competitivas para los trabajadores como yo, y nos ha ayudado a mantenernos durante una pandemia mundial.

Atentamente,

Fernando Martinez
Santa Rosa, CA 95403

February 5, 2021

Sonoma County Board of Supervisors

575 Administration Dr #102A

Administration Building

Santa Rosa, CA 95403

Dear PRMD & Sonoma County Supervisors,

My name is Fernando Martinez, and I am writing to express my support for the increase in land use for cannabis cultivation in the new draft cannabis ordinance. By increasing the percentage of land use on properties for cultivation purposes, this will increase the jobs available for the people of Sonoma County. The cannabis industry has provided great working conditions and extremely competitive hourly rates for ag workers like myself and has helped us maintain during a global pandemic.

Respectfully,

Fernando Martinez

Santa Rosa, CA 95403

[ENGLISH BELOW]

26 de febrero de 2021

Sonoma County Board of Supervisors

575 Administration Dr #102A

Administration Building

Santa Rosa, CA 95403

Estimado PRMD y Supervisores del condado de sonoma,

Mi nombre es Florencio Calihua y le escribo para expresar mi apoyo al aumento del uso de la tierra para el cultivo de cannabis en la nueva revisión de la ordenanza del cannabis. Al aumentar el porcentaje de uso de la tierra en las propiedades con fines de cultivo, esto aumentará los puestos de trabajo disponibles para la gente del condado de Sonoma. La industria del cannabis ha proporcionado excelentes condiciones de trabajo y tarifas por hora extremadamente competitivas para los trabajadores como yo, y nos ha ayudado a mantenernos durante una pandemia mundial.

Atentamente,

Florencio Calihua
Lamont, CA 93241

February 5, 2021

Sonoma County Board of Supervisors

575 Administration Dr #102A

Administration Building

Santa Rosa, CA 95403

Dear PRMD & Sonoma County Supervisors,

My name is Florencio Calihua, and I am writing to express my support for the increase in land use for cannabis cultivation in the new draft cannabis ordinance. By increasing the percentage of land use on properties for cultivation purposes, this will increase the jobs available for the people of Sonoma County. The cannabis industry has provided great working conditions and extremely competitive hourly rates for ag workers like myself and has helped us maintain during a global pandemic.

Respectfully,

Florencio Calihua

Lamont, CA 93241

[ENGLISH BELOW]

26 de febrero de 2021

Sonoma County Board of Supervisors

575 Administration Dr #102A

Administration Building

Santa Rosa, CA 95403

Estimado PRMD y Supervisores del condado de sonoma,

Mi nombre es German Flores y le escribo para expresar mi apoyo al aumento del uso de la tierra para el cultivo de cannabis en la nueva revisión de la ordenanza del cannabis. Al aumentar el porcentaje de uso de la tierra en las propiedades con fines de cultivo, esto aumentará los puestos de trabajo disponibles para la gente del condado de Sonoma. La industria del cannabis ha proporcionado excelentes condiciones de trabajo y tarifas por hora extremadamente competitivas para los trabajadores como yo, y nos ha ayudado a mantenernos durante una pandemia mundial.

Atentamente,

German Flores
Santa Rosa, CA 95403

February 5, 2021

Sonoma County Board of Supervisors

575 Administration Dr #102A

Administration Building

Santa Rosa, CA 95403

Dear PRMD & Sonoma County Supervisors,

My name is German Flores, and I am writing to express my support for the increase in land use for cannabis cultivation in the new draft cannabis ordinance. By increasing the percentage of land use on properties for cultivation purposes, this will increase the jobs available for the people of Sonoma County. The cannabis industry has provided great working conditions and extremely competitive hourly rates for ag workers like myself and has helped us maintain during a global pandemic.

Respectfully,

German Flores

Santa Rosa, CA 95403

February 5, 2021

Sonoma County Board of Supervisors

575 Administration Dr #102A

Administration Building

Santa Rosa, CA 95403

Dear PRMD & Sonoma County Supervisors,

My name is Greg Brown, and I am writing to express my support for the newly drafted cannabis ordinance. There are so many positives that the cannabis industry brings to Sonoma County every month of the year, especially allowing hoop houses that create for staggered harvests, which maintain consistent jobs year round and consistent revenues. This is a critical element to ensure success of our local economy. This ordinance proposal is important to those of us who are employed by the industry because we know the economic benefits are going to bring all of us. Please support the ordinance and thank you for your time.

Respectfully,

Greg Brown

greg@elyoncannabis.com

5355 Skylane Blvd, Santa Rosa, CA 95403

March 6, 2021

Sonoma County Board of Supervisors

575 Administration Dr #102A

Administration Building

Santa Rosa, CA 95403

Dear PRMD & Sonoma County Supervisors,

My name is Heinrich Badenhorst, and I am writing to express my support for the increase in land use for cannabis cultivation in the new draft cannabis ordinance. By increasing the percentage of land use on properties for cultivation purposes, this will increase the jobs available for the people of Sonoma County. The cannabis industry has provided great working conditions and extremely competitive hourly rates for ag workers like myself and has helped us maintain during a global pandemic. Cannabis is alternative medicine that has not only helped me greatly, but I have witnessed how it helped other patients. Please make the changes to support the industry thrive and help more people like me.

Thank You,

Heinrich Badenhorst

heinrich@missioncannabisclub.com

2441 Mission Street, San Francisco, CA 94110

March 1, 2021

Sonoma County Board of Supervisors

575 Administration Dr #102A

Administration Building

Santa Rosa, CA 95403

Dear PRMD & Sonoma County Supervisors,

My name is Herman J. Hernandez, and I am writing to express my support for the increase in land use for cannabis cultivation in the new draft cannabis ordinance. By increasing the percentage of land use on properties for cultivation purposes, this will increase the jobs available for the people of Sonoma County. The cannabis industry has provided great working conditions and extremely competitive hourly rates for ag workers and has helped maintain consistent employment during a global pandemic.

Thank You,

Herman J Hernandez

18050 Sweetwater Springs Rd.

Guerneville, CA 95446

[ENGLISH BELOW]

5 de febrero de 2021

Sonoma County Board of Supervisors

575 Administration Dr #102A

Administration Building

Santa Rosa, CA 95403

Estimado PRMD y Supervisores del condado de sonoma,

Mi nombre es Hilario Garcia Sanchez y le escribo para expresar mi apoyo a la nueva ordenanza del cannabis. Hay tantos aspectos positivos que la industria del cannabis aporta al condado de Sonoma, especialmente al permitir casas de haro que se crean para cosechas escalonadas, y mantienen trabajo e ingresos constante durante todo el año. Este es un elemento crítico para asegurar el éxito de nuestra economía local. Esta revisión de la ordenanza es importante para nosotros que somos empleados de la industria porque sabemos que los beneficios económicos que nos traerá. Por favor apoye la ordenanza y gracias por su tiempo.

Atentamente,

Hilario Garcia Sanchez
Santa Rosa, CA 95403

February 5, 2021

Sonoma County Board of Supervisors

575 Administration Dr #102A

Administration Building

Santa Rosa, CA 95403

Dear PRMD & Sonoma County Supervisors,

My name is Hilario Garcia Sanchez, and I am writing to express my support for the newly drafted cannabis ordinance. There are so many positives that the cannabis industry brings to Sonoma County every month of the year, especially allowing hoop houses that create for staggered harvests, which maintain consistent jobs year round and consistent revenues. This is a critical element to ensure success of our local economy. This ordinance proposal is important to those of us who are employed by the industry because we know the economic benefits are going to bring all of us. Please support the ordinance and thank you for your time.

Respectfully,

Hilario Garcia Sanchez

Santa Rosa, CA 95403

[ENGLISH BELOW]

26 de febrero de 2021

Sonoma County Board of Supervisors
575 Administration Dr #102A
Administration Building
Santa Rosa, CA 95403

Estimado PRMD y Supervisores del condado de sonoma,

Mi nombre es Ignacio Reyes, y le escribo para expresar mi apoyo a la revisión de la ordenanza de cannabis. Como empleado de la industria del cannabis, sé lo importante que es la revisión de la ordenanza del cannabis y el impacto positivo que puede tener en nuestra economía y comunidad locales. ¡Nuestra economía lo necesita! La industria del cannabis ha proporcionado condiciones excelentes de trabajo y tarifas por hora extremadamente competitivas para trabajadores como yo y nos ha ayudado a mantenernos durante una pandemia mundial. Por favor apoye esta ordenanza y gracias por su consideración.

Atentamente,

Ignacio Reyes
Santa Rosa, CA 95403

February 26, 2021

Sonoma County Board of Supervisors

575 Administration Dr #102A

Administration Building

Santa Rosa, CA 95403

Dear PRMD & Sonoma County Supervisors,

My name is Ignacio Reyes, and I am writing to express my support for the revised cannabis ordinance. As an employee in the cannabis industry I know how important the The cannabis ordinance revision is and the positive impact it can have on our local economy and community. Our economy needs it! The cannabis industry has provided great working conditions and extremely competitive hourly rates for workers like myself and has helped us maintain during a global pandemic. Please support this ordinance and thank you for your consideration.

Respectfully,

Ignacio Reyes

Santa Rosa, CA 95403

March 1, 2021

Sonoma County Board of Supervisors

575 Administration Dr #102A

Administration Building

Santa Rosa, CA 95403

Dear PRMD & Sonoma County Supervisors,

I am writing to express my support for the cultivation of cannabis and clustering of properties such as mine. Clustering of farming operations allows for better operation's management. Benefits include reduced fuel and travel expenses, more sustainable labor resource management capabilities, as well as better product provenance connection to the Sonoma County appellation or growing site. Clustering is the environmentally and economically superior policy. Given the sustainable farming movement in Sonoma County, cannabis farming should be viewed and treated similarly to Sonoma County vineyard operators clustering their vineyard operations within a specific appellation for better economic sustainability.

Thank You,

Jeffrey B Schween

4744 Devonshire Place, Santa Rosa, CA 95405

March 1, 2021

Sonoma County Board of Supervisors

575 Administration Dr #102A

Administration Building

Santa Rosa, CA 95403

Dear PRMD & Sonoma County Supervisors,

I am writing to you today in regards to the topic of clustering when it comes to parcels within Sonoma County. Clustering allows better facility design. Many farmers and ranchers would like to set up their operations further away from public view in unused space on their properties, however having to meet 100' setbacks from their own abutting property often pushes them to setting up operations that are not in the most favored area. Clustering will make the application review process more efficient. An owner would be able to submit one application for all of their abutting parcels rather than having to submit one for each parcel, saving the applicant, government, and public time.

Thank You,

Jon Pronzini

5355 Skylane Blvd Santa Rosa, CA 95403

3 March 2021

Sonoma County Board of Supervisors
575 Administration Dr #102A
Administration Building
Santa Rosa, CA 95403

Dear Sonoma County Supervisors & PRMD

I am a cannabis reporter and journalist in the North Bay and I'm writing in support of the use of cannabis hoop houses. I am also greatly in favor of revisions to the cannabis ordinance.

There are scientific benefits to hoop houses and benefits to the community benefits. Hoop houses are essential for the sustainability of Sonoma County cannabis. They help small and medium-sized cannabis farmers grow a high quality product. They also enable Sonoma County growers to compete with cannabis operators in other parts of California, including Mendocino and Humboldt.

Hoop houses protect cannabis from smoke and particulate matter. With hoop houses, cannabis is cleaner, and as you know clean cannabis is especially essential for medical cannabis patients. They also serve as a screen and can add a layers of security to the operation.

Thank you for your consideration,

Jonah Raskin
Reporter/ columnist for the Bohemian and the Pacific Sun
9094 Old Redwood Highway
Cotati, CA. 94931.

March 12, 2021

Sonoma County Board of Supervisors

575 Administration Dr #102A

Administration Building

Santa Rosa, CA 95403

Dear PRMD & Sonoma County Supervisors,

My name is Jordan Richardson, and I am writing to express my support for the increase in land use for cannabis cultivation in the new draft cannabis ordinance. By increasing the percentage of land use on properties for cultivation purposes, this will increase the jobs available for the people of Sonoma County. The cannabis industry has provided great working conditions and extremely competitive hourly rates for ag workers like myself and has helped us maintain during a global pandemic.

Thank You,

Jordan Richardson

5355 Skylane Blvd. Ste.A Santa Rosa, CA 95403

[ENGLISH BELOW]

26 de febrero de 2021

Sonoma County Board of Supervisors
575 Administration Dr #102A
Administration Building
Santa Rosa, CA 95403

Estimado PRMD y Supervisores del condado de sonoma,

Mi nombre es Jose Franco Bonilla, y le escribo para expresar mi apoyo a la revisión de la ordenanza de cannabis. Como empleado de la industria del cannabis, sé lo importante que es la revisión de la ordenanza del cannabis y el impacto positivo que puede tener en nuestra economía y comunidad locales. ¡Nuestra economía lo necesita! La industria del cannabis ha proporcionado condiciones excelentes de trabajo y tarifas por hora extremadamente competitivas para trabajadores como yo y nos ha ayudado a mantenernos durante una pandemia mundial. Por favor apoye esta ordenanza y gracias por su consideración.

Atentamente,

Jose Franco Bonilla
Santa Rosa, CA 95403

February 26, 2021

Sonoma County Board of Supervisors

575 Administration Dr #102A

Administration Building

Santa Rosa, CA 95403

Dear PRMD & Sonoma County Supervisors,

My name is Jose Franco Bonilla, and I am writing to express my support for the revised cannabis ordinance. As an employee in the cannabis industry I know how important the The cannabis ordinance revision is and the positive impact it can have on our local economy and community. Our economy needs it! The cannabis industry has provided great working conditions and extremely competitive hourly rates for workers like myself and has helped us maintain during a global pandemic. Please support this ordinance and thank you for your consideration.

Respectfully,

Jose Franco Bonilla

Santa Rosa, CA 95403

March 1, 2021

Sonoma County Board of Supervisors

575 Administration Dr #102A

Administration Building

Santa Rosa, CA 95403

Dear PRMD & Sonoma County Supervisors,

My name is Jose Wagner Alava, and I am writing to express my support for the increase in land use for cannabis cultivation in the new draft cannabis ordinance. By increasing the percentage of land use on properties for cultivation purposes, this will increase the jobs available for the people of Sonoma County. The cannabis industry has provided great working conditions and extremely competitive hourly rates for ag workers like myself and has helped us maintain during a global pandemic. Thank you for your consideration.

Thank You,

Jose Wagner Alava

835 Fresno Ave, Santa Rosa, CA 95407

[ENGLISH BELOW]

26 de febrero de 2021

Sonoma County Board of Supervisors

575 Administration Dr #102A

Administration Building

Santa Rosa, CA 95403

Estimado PRMD y Supervisores del condado de sonoma,

Mi nombre es Juan Reyes y le escribo para expresar mi apoyo al aumento del uso de la tierra para el cultivo de cannabis en la nueva revisión de la ordenanza del cannabis. Al aumentar el porcentaje de uso de la tierra en las propiedades con fines de cultivo, esto aumentará los puestos de trabajo disponibles para la gente del condado de Sonoma. La industria del cannabis ha proporcionado excelentes condiciones de trabajo y tarifas por hora extremadamente competitivas para los trabajadores como yo, y nos ha ayudado a mantenernos durante una pandemia mundial.

Atentamente,

Juan Reyes
Santa Rosa, CA 95403

February 5, 2021

Sonoma County Board of Supervisors

575 Administration Dr #102A

Administration Building

Santa Rosa, CA 95403

Dear PRMD & Sonoma County Supervisors,

My name is Juan Reyes, and I am writing to express my support for the increase in land use for cannabis cultivation in the new draft cannabis ordinance. By increasing the percentage of land use on properties for cultivation purposes, this will increase the jobs available for the people of Sonoma County. The cannabis industry has provided great working conditions and extremely competitive hourly rates for ag workers like myself and has helped us maintain during a global pandemic.

Respectfully,

Juan Reyes

Santa Rosa, CA 95403

March 1, 2021

Sonoma County Board of Supervisors

575 Administration Dr #102A

Administration Building

Santa Rosa, CA 95403

Dear PRMD & Sonoma County Supervisors,

My name is Justin Manns, and I am writing to express my support for the increase in land use for cannabis cultivation in the new draft cannabis ordinance. By increasing the percentage of land use on properties for cultivation purposes, this will increase the jobs available for the people of Sonoma County. The cannabis industry has provided great working conditions and extremely competitive hourly rates for ag workers like myself and has helped us maintain during a global pandemic. Thank you for your consideration.

Thank You,

Justin Manns

5355 Skylane Blvd. Ste. A Santa Rosa, CA 95403

March 1, 2021

Sonoma County Board of Supervisors

575 Administration Dr #102A

Administration Building

Santa Rosa, CA 95403

Dear PRMD & Sonoma County Supervisors,

My name is Justin Taylor Delong, and I am writing to express my support for the increase in land use for cannabis cultivation in the new draft cannabis ordinance. By increasing the percentage of land use on properties for cultivation purposes, this will increase the jobs available for the people of Sonoma County. The cannabis industry has provided great working conditions and extremely competitive hourly rates for ag workers like myself and has helped us maintain during a global pandemic. Thank you for your consideration.

Thank You,

Justin Taylor Delong

909 Magnolia Dr. Unit B, Healdsburg, CA 95448

February 5, 2021

Sonoma County Board of Supervisors

575 Administration Dr #102A

Administration Building

Santa Rosa, CA 95403

Dear PRMD & Sonoma County Supervisors,

My name is Kiera Christopherson, and I am writing to express my support for the newly drafted cannabis ordinance. There are so many positives that the cannabis industry brings to Sonoma County every month of the year, especially allowing hoop houses that create for staggered harvests, which maintain consistent jobs year round and consistent revenues. This is a critical element to ensure success of our local economy. This ordinance proposal is important to those of us who are employed by the industry because we know the economic benefits are going to bring all of us. Please support the ordinance and thank you for your time.

Respectfully,

Kiera Christopherson

Kiera@elyoncannabis.com

310 Elbridge Ave Cloverdale CA 95425

[ENGLISH BELOW]

26 de febrero de 2021

Sonoma County Board of Supervisors
575 Administration Dr #102A
Administration Building
Santa Rosa, CA 95403

Estimado PRMD y Supervisores del condado de sonoma,

Mi nombre es Moises Garcia, y le escribo para expresar mi apoyo a la revisión de la ordenanza de cannabis. Como empleado de la industria del cannabis, sé lo importante que es la revisión de la ordenanza del cannabis y el impacto positivo que puede tener en nuestra economía y comunidad locales. ¡Nuestra economía lo necesita! La industria del cannabis ha proporcionado condiciones excelentes de trabajo y tarifas por hora extremadamente competitivas para trabajadores como yo y nos ha ayudado a mantenernos durante una pandemia mundial. Por favor apoye esta ordenanza y gracias por su consideración.

Atentamente,

Moises Garcia
Bakersfield, CA 93305

February 26, 2021

Sonoma County Board of Supervisors

575 Administration Dr #102A

Administration Building

Santa Rosa, CA 95403

Dear PRMD & Sonoma County Supervisors,

My name is Moises Garcia, and I am writing to express my support for the revised cannabis ordinance. As an employee in the cannabis industry I know how important the The cannabis ordinance revision is and the positive impact it can have on our local economy and community. Our economy needs it! The cannabis industry has provided great working conditions and extremely competitive hourly rates for workers like myself and has helped us maintain during a global pandemic. Please support this ordinance and thank you for your consideration.

Respectfully,

Moises Garcia

Bakersfield, CA 93305

[ENGLISH BELOW]

26 de febrero de 2021

Sonoma County Board of Supervisors
575 Administration Dr #102A
Administration Building
Santa Rosa, CA 95403

Estimado PRMD y Supervisores del condado de sonoma,

Mi nombre es Morena Pacas, y le escribo para expresar mi apoyo a la revisión de la ordenanza de cannabis. Como empleado de la industria del cannabis, sé lo importante que es la revisión de la ordenanza del cannabis y el impacto positivo que puede tener en nuestra economía y comunidad locales. ¡Nuestra economía lo necesita! La industria del cannabis ha proporcionado condiciones excelentes de trabajo y tarifas por hora extremadamente competitivas para trabajadores como yo y nos ha ayudado a mantenernos durante una pandemia mundial. Por favor apoye esta ordenanza y gracias por su consideración.

Atentamente,

Morena Pacas
Santa Rosa, CA 95403

February 26, 2021

Sonoma County Board of Supervisors

575 Administration Dr #102A

Administration Building

Santa Rosa, CA 95403

Dear PRMD & Sonoma County Supervisors,

My name is Morena Pacas, and I am writing to express my support for the revised cannabis ordinance. As an employee in the cannabis industry I know how important the The cannabis ordinance revision is and the positive impact it can have on our local economy and community. Our economy needs it! The cannabis industry has provided great working conditions and extremely competitive hourly rates for workers like myself and has helped us maintain during a global pandemic. Please support this ordinance and thank you for your consideration.

Respectfully,

Morena Pacas

Santa Rosa, CA 95403

[ENGLISH BELOW]

26 de febrero de 2021

Sonoma County Board of Supervisors
575 Administration Dr #102A
Administration Building
Santa Rosa, CA 95403

Estimado PRMD y Supervisores del condado de sonoma,

Mi nombre es Oscar Gil Toribio, y le escribo para expresar mi apoyo a la revisión de la ordenanza de cannabis. Como empleado de la industria del cannabis, sé lo importante que es la revisión de la ordenanza del cannabis y el impacto positivo que puede tener en nuestra economía y comunidad locales. ¡Nuestra economía lo necesita! La industria del cannabis ha proporcionado condiciones excelentes de trabajo y tarifas por hora extremadamente competitivas para trabajadores como yo y nos ha ayudado a mantenernos durante una pandemia mundial. Por favor apoye esta ordenanza y gracias por su consideración.

Atentamente,

Oscar Gil Toribio
Bakersfield, CA 93305

February 26, 2021

Sonoma County Board of Supervisors

575 Administration Dr #102A

Administration Building

Santa Rosa, CA 95403

Dear PRMD & Sonoma County Supervisors,

My name is Oscar Gil Toribio, and I am writing to express my support for the revised cannabis ordinance. As an employee in the cannabis industry I know how important the The cannabis ordinance revision is and the positive impact it can have on our local economy and community. Our economy needs it! The cannabis industry has provided great working conditions and extremely competitive hourly rates for workers like myself and has helped us maintain during a global pandemic. Please support this ordinance and thank you for your consideration.

Respectfully,

Oscar Gil Toribio

Bakersfield, CA 93305

[ENGLISH BELOW]

26 de febrero de 2021

Sonoma County Board of Supervisors

575 Administration Dr #102A

Administration Building

Santa Rosa, CA 95403

Estimado PRMD y Supervisores del condado de sonoma,

Mi nombre es Rima Munoz Zambrano y le escribo para expresar mi apoyo al aumento del uso de la tierra para el cultivo de cannabis en la nueva revisión de la ordenanza del cannabis. Al aumentar el porcentaje de uso de la tierra en las propiedades con fines de cultivo, esto aumentará los puestos de trabajo disponibles para la gente del condado de Sonoma. La industria del cannabis ha proporcionado excelentes condiciones de trabajo y tarifas por hora extremadamente competitivas para los trabajadores como yo, y nos ha ayudado a mantenernos durante una pandemia mundial.

Atentamente,

Rima Munoz Zambrano
Santa Rosa, CA 95407

February 5, 2021

Sonoma County Board of Supervisors

575 Administration Dr #102A

Administration Building

Santa Rosa, CA 95403

Dear PRMD & Sonoma County Supervisors,

My name is Rima Munoz Zambrano, and I am writing to express my support for the increase in land use for cannabis cultivation in the new draft cannabis ordinance. By increasing the percentage of land use on properties for cultivation purposes, this will increase the jobs available for the people of Sonoma County. The cannabis industry has provided great working conditions and extremely competitive hourly rates for ag workers like myself and has helped us maintain during a global pandemic.

Respectfully,

Rima Munoz Zambrano

Santa Rosa, CA 95407

March 1, 2021

Sonoma County Board of Supervisors

575 Administration Dr #102A

Administration Building

Santa Rosa, CA 95403

Dear PRMD & Sonoma County Supervisors,

I am writing to express my support for the cultivation of cannabis and clustering of properties such as mine -- I am a trustee owner of two properties in Petaluma. Clustering of farming operations allows for better operation's management. Benefits include reduced fuel and travel expenses, more sustainable labor resource management capabilities, as well as better product provenance connection to the Sonoma County appellation or growing site. Clustering is the environmentally and economically superior policy. Given the sustainable farming movement in Sonoma County, cannabis farming should be viewed and treated similarly to Sonoma County vineyard operators clustering their vineyard operations within a specific appellation for better economic sustainability.

Thank You,

Robert Weaver

1901 Page St. San Francisco, CA 94109

March 1, 2021

Sonoma County Board of Supervisors

575 Administration Dr #102A

Administration Building

Santa Rosa, CA 95403

Dear PRMD & Sonoma County Supervisors,

My name is Sofia Glorio, and I am writing to express my support for the increase in land use for cannabis cultivation in the new draft cannabis ordinance. By increasing the percentage of land use on properties for cultivation purposes, this will increase the jobs available for the people of Sonoma County. The cannabis industry has provided great working conditions and extremely competitive hourly rates for ag workers like myself and has helped us maintain during a global pandemic. Lastly, Cannabis has been a part of my life for over 10 years now. I am so fortunate to see how our county has adapted to Cannabis and how much they appreciate all the medicinal benefits. Thank you for your consideration.

Thank You,

Sofia Glorio

1534 King Street, Santa Rosa, CA, 95404

[ENGLISH BELOW]

26 de febrero de 2021

Sonoma County Board of Supervisors

575 Administration Dr #102A

Administration Building

Santa Rosa, CA 95403

Estimado PRMD y Supervisores del condado de sonoma,

Mi nombre es Teodulo Martinez y le escribo para expresar mi apoyo a la nueva ordenanza del cannabis. Hay tantos aspectos positivos que la industria del cannabis aporta al condado de Sonoma, especialmente al permitir casas de haro que se crean para cosechas escalonadas, y mantienen trabajo e ingresos constante durante todo el año. Este es un elemento crítico para asegurar el éxito de nuestra economía local. Esta revisión de la ordenanza es importante para nosotros que somos empleados de la industria porque sabemos que los beneficios económicos que nos traerá. Por favor apoye la ordenanza y gracias por su tiempo.

Atentamente,

Teodulo Martinez
Arvin, CA 93203

February 26, 2021

Sonoma County Board of Supervisors

575 Administration Dr #102A

Administration Building

Santa Rosa, CA 95403

Dear PRMD & Sonoma County Supervisors,

My name is Teodulo Martinez, and I am writing to express my support for the newly drafted cannabis ordinance. There are so many positives that the cannabis industry brings to Sonoma County every month of the year, especially allowing hoop houses that create for staggered harvests, which maintain consistent jobs year round and consistent revenues. This is a critical element to ensure success of our local economy. This ordinance proposal is important to those of us who are employed by the industry because we know the economic benefits are going to bring all of us. Please support the ordinance and thank you for your time.

Respectfully,

Teodulo Martinez

Arvin, CA 93203

March 1, 2021

Sonoma County Board of Supervisors

575 Administration Dr #102A

Administration Building

Santa Rosa, CA 95403

Dear PRMD & Sonoma County Supervisors,

I am writing to express my support for the cultivation of cannabis and clustering of properties such as mine. Clustering of farming operations allows for better operation's management.

Benefits include reduced fuel and travel expenses, more sustainable labor resource management capabilities, as well as better product provenance connection to the Sonoma County appellation or growing site. Clustering is the environmentally and economically superior policy. Given the sustainable farming movement in Sonoma County, cannabis farming should be viewed and treated similarly to Sonoma County vineyard operators clustering their vineyard operations within a specific appellation for better economic sustainability.

Thank You,

Thomas P Altenreuther

520 Stage Gulch Rd., Petaluma, CA 94954

March 1, 2021

Sonoma County Board of Supervisors

575 Administration Dr #102A

Administration Building

Santa Rosa, CA 95403

Dear PRMD & Sonoma County Supervisors,

As an employee of the cannabis industry, I want to express my support for the continued use of hoop structures for cannabis cultivation in the new draft cannabis ordinance. The use of hoop, and similar structures, is what helps to create craft quality cannabis, while maintaining a lower carbon footprint. By allowing various cultivators across Sonoma County to increase their usage of hoop structures, we can continue to provide Sonoma quality cannabis.

Respectfully,

Tony Yang

5355 Skylane Blvd Santa Rosa, CA 95403

Sonoma County Board of Supervisors
575 Administration Dr #102A
Administration Building
Santa Rosa, CA 95403

Dear PRMD & Sonoma County Supervisors,

I write to you today to encourage you to adopt a comprehensive cannabis cultivation ordinance that will expand the industry responsibly to grow our economy and support those ancillary businesses that benefit from a working cannabis industry.

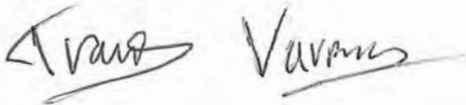
As with any other sector or industry, cannabis farmers spend money to build their farming capacity. That means infrastructure, hiring tradespeople, and purchasing building materials. All of this keeps our collective economy flowing with the exchange of goods and services. There are hundreds of cannabis ancillary businesses throughout Sonoma County that completely depend on the strength and success of the cannabis industry.

A more comprehensive cannabis ordinance should be looking to expand our local economy and share the benefits of this new industry. With local cannabis regulations being in a perpetual state of change, these ordinance revisions should reflect that which the state of California has already deemed appropriate when it comes to cannabis operations. Instead of rewriting the ordinance every 18 months, we ought to strive to match the state policy instead of creating our own. With a comprehensive cannabis ordinance that matches state law, more cannabis businesses and ancillary businesses can participate in the new market with a degree of confidence that the rug won't be pulled out from under them.

As a County we ought to strive to diversify our agricultural offerings and by doing so we are investing in our collective future where a wide range of businesses from soil producers to light manufacturers benefit alike.

Thank you for your consideration,

Travis Varpness

A handwritten signature in black ink that reads "Travis Varpness". The signature is written in a cursive, flowing style.

CFO - Sota Extracts, Inc.
468 Yolanda Avenue, Ste 203
Santa Rosa, CA 95404

[ENGLISH BELOW]

5 de febrero de 2021

Sonoma County Board of Supervisors
575 Administration Dr #102A
Administration Building
Santa Rosa, CA 95403

Estimado PRMD y Supervisores del condado de sonoma,

Mi nombre es Uriel Sanchez, y le escribo para expresar mi apoyo a la revisión de la ordenanza de cannabis. Como empleado de la industria del cannabis, sé lo importante que es la revisión de la ordenanza del cannabis y el impacto positivo que puede tener en nuestra economía y comunidad locales. ¡Nuestra economía lo necesita! La industria del cannabis ha proporcionado condiciones excelentes de trabajo y tarifas por hora extremadamente competitivas para trabajadores como yo y nos ha ayudado a mantenernos durante una pandemia mundial. Por favor apoye esta ordenanza y gracias por su consideración.

Atentamente,

Uriel Sanchez
Bakersfield, CA 93305

February 5, 2021

Sonoma County Board of Supervisors

575 Administration Dr #102A

Administration Building

Santa Rosa, CA 95403

Dear PRMD & Sonoma County Supervisors,

My name is Uriel Sanchez, and I am writing to express my support for the revised cannabis ordinance. As an employee in the cannabis industry I know how important the The cannabis ordinance revision is and the positive impact it can have on our local economy and community. Our economy needs it! The cannabis industry has provided great working conditions and extremely competitive hourly rates for workers like myself and has helped us maintain during a global pandemic. Please support this ordinance and thank you for your consideration.

Respectfully,

Uriel Sanchez

Bakersfield, CA 93305

[ENGLISH BELOW]

26 de febrero de 2021

Sonoma County Board of Supervisors
575 Administration Dr #102A
Administration Building
Santa Rosa, CA 95403

Estimado PRMD y Supervisores del condado de sonoma,

Mi nombre es Victor Gonzales, y le escribo para expresar mi apoyo a la revisión de la ordenanza de cannabis. Como empleado de la industria del cannabis, sé lo importante que es la revisión de la ordenanza del cannabis y el impacto positivo que puede tener en nuestra economía y comunidad locales. ¡Nuestra economía lo necesita! La industria del cannabis ha proporcionado condiciones excelentes de trabajo y tarifas por hora extremadamente competitivas para trabajadores como yo y nos ha ayudado a mantenernos durante una pandemia mundial. Por favor apoye esta ordenanza y gracias por su consideración.

Atentamente,

Victor Gonzales
Santa Rosa, CA 95403

February 26, 2021

Sonoma County Board of Supervisors

575 Administration Dr #102A

Administration Building

Santa Rosa, CA 95403

Dear PRMD & Sonoma County Supervisors,

My name is Victor Gonzales, and I am writing to express my support for the revised cannabis ordinance. As an employee in the cannabis industry I know how important the The cannabis ordinance revision is and the positive impact it can have on our local economy and community. Our economy needs it! The cannabis industry has provided great working conditions and extremely competitive hourly rates for workers like myself and has helped us maintain during a global pandemic. Please support this ordinance and thank you for your consideration.

Respectfully,

Victor Gonzales

Santa Rosa, CA 95403

March 1, 2021

Sonoma County Board of Supervisors

575 Administration Dr #102A

Administration Building

Santa Rosa, CA 95403

Dear PRMD & Sonoma County Supervisors,

I am writing to you today in regards to the topic of clustering when it comes to parcels within Sonoma County. Clustering allows better facility design. Many farmers and ranchers would like to set up their operations further away from public view in unused space on their properties, however having to meet 100' setbacks from their own abutting property often pushes them to setting up operations that are not in the most favored area. Clustering will make the application review process more efficient. An owner would be able to submit one application for all of their abutting parcels rather than having to submit one for each parcel, saving the applicant, government, and public time.

Thank You,

Vidal Castro

1167 Mark West Spring Rd., Santa Rosa, CA 95404

From: [Jessica Green](#)
To: [Cannabis](#)
Cc: [Eddie Green](#); [Jessica Switzer Green](#)
Subject: Local residents urge NO VOTE to Cannabis Ag regulation -
Date: Tuesday, March 16, 2021 4:01:13 PM

EXTERNAL

Dear County of Sonoma and to those it may concern:

As owners of an 8-acre parcel in Sebastopol, Sonoma County, our land borders the Cunningham Conservation Easement, and nature is thriving, lilies and wildlife are protected by the easement status, and it is a picture of paradise. Deer, rabbits and birds are rest and visit the seasonal pond and spring on the easement. Our property borders the Riebli property, and so much would be lost if Cannabis production increased.

We hear the impact most during harvesting time and planting time. Loud radios, people talking, and activity at all hours- night late and day light on the land, all scare away wildlife and impact quality of local life. It also impacts our and others property. Making Cannabis production more heavy would impact the water table, and run off - we all share the water table! Wildlife depending on the watering hole would no doubt be impacted greatly.

We have at our doorsteps a VERY precious opportunity to forever preserve the Riebli parcel, bordering endangered Lilies and as a haven for wildlife, and for all of us residents who moved here and bought acreage for a country quiet lifestyle. We want to live in harmony with nature, not bear witness to more negative human impacts. Please act now to preserve the parcel as nature intended, and to not turn it into Cannabis cultivation.

We URGE the county decision makers to please, please NOT allow Cannabis as an Ag crop, and do NOT allow ZONING for 10% growth of the product or all of SONOMAs beautiful wildlife, and semi rural and rural life will suffer.

Jessica and Eddie Green
1400 Big Cedar Lane
Sebastopol, CA 95472
415 272 3944
jessica@jgswitzer.com

Jessica Switzer Green
Founder
JG SWITZER

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From: [Josh Abrams](#)
To: [Cannabis](#); [Andrew Smith](#); [McCall Miller](#)
Subject: Comments RE: Draft Sonoma County Cannabis Ordinance Update
Date: Tuesday, March 16, 2021 1:46:09 PM

EXTERNAL

Hello Sonoma County Cannabis Program,

I am reaching out with comments on the Draft Commercial Cannabis Ordinance update. Specifically, I would like to ask you to consider providing flexibility on the property line setback requirements for contiguous operations on adjacent parcels under the same ownership. The interior parcel line setback could be eliminated entirely. I believe the potential benefits of eliminating interior parcel line setbacks are numerous for the County, neighborhoods, and cultivators. Potential benefits include:

- Consolidating development activities;
- Reducing the overall area of disturbed soils;
- Creating a smaller project footprint with fewer fenced exclusion areas and reduced impacts to wildlife;
- The potential to protect scenic resources through the strategic location of operations;
- Removing a burden from operators who currently need to separate operations up to 200 feet from each other; and,
- The potential to increase the distance of cultivation operations from sensitive receptors off-site by locating operations centrally on a set of adjacent parcels.
- The potential to reduce odor impacts by locating operations further from sensitive receptors.

In my opinion, eliminating interior parcel line setbacks seems like a common sense approach to allowing operators to aggregate their activities, reduce the overall footprint of operations, increase efficiency for operators, protect community resources, and take another step towards de-stigmatizing cultivation and farming in general. Below are two examples of how other local jurisdictions have handled the issue in their Commercial Cannabis Ordinances.

Lake County Cannabis Ordinance No. 3084

http://www.lakecountyca.gov/Government/Directory/Community_Development/Planning/ZoneOrd.htm

ii. General Requirements

(j) Collocation of Permits and Clustering

Multiple Cultivation permits may be allowed on a single parcel provided that each permit meets the minimum acreage requirement and all other development standards. Clustering a cultivation site across multiple contiguous parcels may be permitted when all of the following criteria are met:

- (1) All parcels must qualify for a commercial cannabis cultivation permit independently,
- (2) Title interest on all parcels shall be held under the same identical ownership.
- (3) All required cultivation setbacks shall be maintained from exterior property lines and the cultivation site may be permitted to cross contiguous property lines,
- (4) A deed restriction prohibiting commercial cannabis cultivation shall be recorded on each parcel where density has been transferred.

Humboldt County Commercial Cannabis Land Use Ordinance No. 2599

<https://humboldt.gov/DocumentCenter/View/63734/Ord-No-2599-CCLUO-inland-certified-copy-PDF>

55.4.6.4.4 Setbacks

Standard Setbacks

Cultivation Site(s) must observe all of the following setbacks:

- a) Property Lines - Thirty (30') feet from any property line;
- b) Residences and undeveloped parcels - Three hundred feet (300') from any residence on an adjacent separately owned parcel, and two hundred seventy feet (270') from any adjacent undeveloped separately owned parcel.
- e) The setback required from associated property lines or residence(s) on an adjacent privately-owned property may be waived or reduced with the express written consent of the owner(s) of the subject property.
- h) Additionally, in cases where one or more discrete premises span multiple parcels, the 30-foot setback from shared boundary lines may be waived for cultivation activities which do not occur within a structure.

Thank you for your consideration. Please let me know if you have any questions.

Best Regards,

Josh
HPC Consulting
Josh@higherpathconsulting.com
(707) 481-9628

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From: jim@braccos.com
To: [Cannabis](#)
Subject: Town Hall questions and video
Date: Tuesday, March 16, 2021 12:01:39 PM

EXTERNAL

Hi,

Can you tell me where to find the questions from the Town Halls?
Also the videos of the Town Halls?

Thanks,
-jim bracco

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From: [Joyce Cenali](#)
To: [Cannabis](#)
Subject: Sonoma Hills Farm response to Sonoma County's proposed cannabis cultivation amendments
Date: Tuesday, March 16, 2021 4:23:51 PM
Attachments: [SHF_SonomaCountyCannabisPermitting.pdf](#)

EXTERNAL

To whom it may concern:

We appreciate your thoughtful consideration to our attached comments regarding Sonoma County's proposed amendments to allow expanded ministerial permitting for commercial cannabis cultivation in agricultural and resource zoned areas.

Joyce Cenali
COO, [Sonoma Hills Farm](#)
415.609.5251

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Tuesday, March 16, 2021

Re: Comments regarding Sonoma County Planning Commission commercial cannabis cultivation

For over two centuries, farming has been one of the top economic drivers in Sonoma county, essential to both its local economy and bolstering its tourism due to its global recognition as a crucial agriculture zone and rich with the most wine appellations in a single county in the world.

Sonoma county's agriculture currently produces over \$1B in annual production, with grapes as the #1 crop and dairy as the #2 crop, and poultry and livestock as #3 and #4.

dairies and over 400 wineries in the county, and countless tens of thousands of acres and farmland committed to cow grazing and vineyards.

Cannabis is Agriculture.

5,000+ farmers during the Prop. 215 years, but due to the long processing delays and intensive rigor of Sonoma's permitting process ensued since the Prop 64 passage, the Sonoma cannabis industry is a shadow of its former self. Indeed 59% of Sonoma county residents voted favorably for Prop 64 and to allow cannabis activities in the county, approximately ~2% higher than the state average of 57% favorability. Despite county officials' efforts and intentions, operators seeking to obtain the "Medium Outdoor" zoning permits must wait years for permits and the process requires very deep pockets. In our case, our local permit took well over 2 years to authorize, incurred excessive costs compared to our review of other start-up costs in other CA counties, and included an intensive land and project surveyance with our authorship of over 170 special reports. It is our understanding that very few similar "Medium Outdoor" permits have been granted, and these permits are sought through the zoning department, while the "Small Outdoor" permits are authorized through the agriculture department. This inconsistent permit track should be addressed, and we agree that moving cannabis cultivation to the Department of Agriculture is the right move in order to streamline permitting and reduce the barrier of entry to the program. Some carry-over should apply, and specifically, the full CEQA guidelines, water management, and other crucial environmental oversight.

Cannabis is good for Sonoma.

Many of the other strong agriculture focused counties that also passed Prop 64 have allowed larger grows with less scrutiny. Those counties include Monterey, Santa Barbara, Yolo, Humboldt, Trinity, and neighboring counties Lake and soon Mendocino. Sonoma is a one of the more viable outdoor climates in the state and to restrict larger grows will encumber Sonoma's opportunity, and force the best cultivators to abandon the county and move their businesses to other tax districts.

Despite opposition, the cannabis cultivation that has been authorized in the county has not brought hell and brimstone to the community. Various neighborhood groups have been started to oppose the reasonable cannabis path in the county, and these groups have based their opposition on 3 major claims, all of which are FALSE:



Cannabis incurs excessive water use = FALSE. If you look at the overall water requirements to bring products to market across the bigger cash crops in Sonoma, you'll find that this is not the case.

Sonoma County's water table usage shows that:

- Cattle: 1.8 head per acre @ 25 gallons average per day = 16,425 gallons/year
- Grapes: Average per acre usage in Sonoma and Napa counties = 162,925 gallons per year
- Cannabis: Average per acre usage = 300,000 gallons per year

However, when broken down into individual products, with an anticipated serving size of:

- Cattle: 8 oz of raw meat
- Wine: 2 glasses (10 oz)
- Cannabis: .5g smokable

The argument breaks when considering the number of consumers touched by the acreage impact:

- One acre of cattle: 750 servings per year, or 21.9 gallons of water used per serving
- One acre of vineyard: 8000 servings per year, or 20.36 gallons of water used per serving
- One acre of cannabis cultivation = 2.7M servings per year, or .111 gallons of water used per serving

Cannabis is excessively odorous = FALSE. As do many crops, cannabis does indeed have an odor, particularly in its flowering season. However, when compared to other crops in the county that produce the well-known "Sonoma Aroma", cannabis is more pleasant. There is likely no farmer of any crop in the county that operates far from a dairy or poultry farm. Sonoma Hills Farm happens to be located across the street from one of the largest manure operations in the county, and we'd beg to differ that our crop produces a more odorous aroma than theirs.

Cannabis introduces security risks = FALSE.

The intense rigor of the security program required by the state reinforces that cannabis grows are highly secure. No addresses are listed to the public, no signage is allowed at the farms, and intense security such as large and hardened fences, camera surveillance, and onsite guards are often required. The Metrc track and trace system makes it such that it is very difficult to move cannabis outside of the legal market, and thus compared to any other cash crop in the county, cannabis is the most secure.

Cannabis will reinforce a strong economy and increase tourism in Sonoma County. Supply and demand show that California cannabis consumers want more Sonoma County cannabis. Our project, for example, has been deemed by our retail partners and consumers to be superior compared to many other outdoor cannabis grown in other counties. Sonoma Hills Farm is touching consumers far and wide, and has received notable national and statewide press, including [NBS News](#), [Food & Wine](#), [Forbes](#), a cover story in the [LA Weekly](#), and in local publications such as the [SF Weekly](#), [Sonoma Magazine](#), the [Press Democrat](#), and the [Bohemian](#).



Sonoma county with its vast pastureland, livestock history and organic vineyards, offers superior terroir for cannabis because the surrounding land is unencumbered by pesticide spray and harmful chemical fertilizers. On September 29, California Gov. Gavin Newsom signed Senate Bill 67 into law, signaling that in 2021, the California Department of Food and Agriculture's Cannabis Appellations Program will begin to accept petition applications from California growers to establish the first ever cannabis appellations of origin. In recalling the other counties noted above where outdoor agriculture is prevalent, Sonoma county is unparalleled with its rich soil and climate. At such time that regulations catch up to the will of the people, Sonoma county will be one of the top cannabis tourism destinations in the world, drawing consumers to our unique cannabis appellations.

In synopsis, it is our belief that the county should:

- Approve the expanded ministerial permitting for commercial cannabis cultivation
- Authorize Sonoma county agriculture department to approve future permits
- Enact reasonable environmental oversight by requiring compliance with CEQA guidelines and other crucial environmental standards

Thank you,
The team at Sonoma Hills Farm
SonomaHillsFarm.com

Source reading:

<https://sonomafb.org/agriculture-continues-to-be-a-major-driver-of-todays-robust-sonoma-county-economy/>

<https://www.pressdemocrat.com/article/business/sonoma-county-surpasses-1-billion-in-annual-agricultural-production-for-fi/>

<https://www.sonomamag.com/sonoma-county-named-top-travel-destination-in-the-world/>

<https://www.canorml.org/two-thirds-of-californias-counties-vote-for-prop-64/>

From: [Jani Friedman](#)
To: [Cannabis](#)
Subject: I'd like to receive a copy of the powerpoint presentation from the town hall zoom meetings
Date: Monday, March 15, 2021 9:26:05 PM

EXTERNAL

Thank you.

Jani Friedman
415-999-8446 cell

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From: [Jennifer Klendworth](#)
To: [Cannabis](#)
Subject: Sonoma County Cannabis Program
Date: Tuesday, March 16, 2021 6:15:39 PM

EXTERNAL

I have strong concerns about the direction of Santa Rosa and Sonoma County. I feel that we are too liberal and I am literally watching our city change as we speak. If we continue to be progressive with issues like cannabis cultivation, we will continue to attract residents and businesses that will have a negative impact on our culture. I'm actually a fairly liberal person and I really don't care what people do with their personal time as long as it doesn't affect the welfare and wellbeing of others. In my opinion we don't need to be ahead of the curve, we should have a moderate approach. I used to think I would spend the rest of my life here but I think that ship is getting ready to sail if we don't start making some changes in the values of the city.

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From: [Chelsea Holup](#) on behalf of [PlanningAgency](#)
To: [Cannabis](#)
Subject: FW: Comment for 3/18 Cannabis meeting
Date: Tuesday, March 16, 2021 1:58:53 PM
Attachments: [image001.png](#)

From: katie moore <katie@teaa.net>
Sent: March 16, 2021 12:25 PM
To: PlanningAgency <PlanningAgency@sonoma-county.org>
Subject: Comment for 3/18 Cannabis meeting

EXTERNAL

To whom it may concern,

My name is Katie Moore, and I am a 20-year resident of 2855 Fulton Road in Fulton. My property is a 5-acre parcel zoned DA-10. I am writing with great concern regarding the Supervisors' proposed cannabis ordinance and proposed sweeping changes to the amount of cannabis that may be grown in Sonoma County.

For the past two years, a cannabis farm has operated at 1737 Wood Road (UPC17-0034) under the Penalty Relief Program. This facility has neither a state nor county permit. Their county permit was denied by the BZA in December 2019 based on the presence of federally-protected habitat. The grower filed an appeal, yet an appeal hearing has yet to be heard -- more than a year later. The grower continues to operate, building multiple unpermitted structures *in the middle of the protected habitat*.

On the satellite image, below, you can see my parcel at 2855 Fulton Rd on the upper right. At the lower left is the cannabis farm at 1737 Wood Road. There is approximately 2,000 feet between the grow operations and my home. I am directly downwind of the grow.

This operation presents a constant odor during grow season. A distance of 2,000 feet does little to mitigate the smell --- especially when one is directly downwind. From Summer to Fall, I experience the smell of cannabis. When a visitor arrives at my property during the growing season, the first thing to tell them is "I am not smoking pot. There is a cannabis farm nearby."

If you drive down Wood Road on any given warm day during Summer and Fall, the smell is overwhelming and nauseating. The distance from the greenhouses to Wood Rd is approximately 400 feet, with Wood Road being upwind of the grow operations.

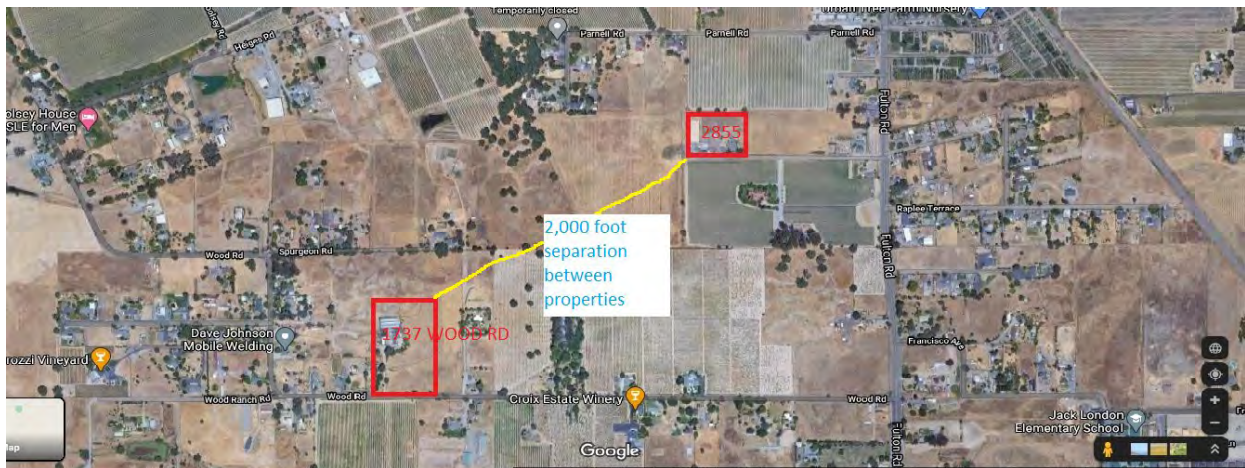
When I reached out to the county about the smell, I was told that growers are required to have a "filtration system" that takes care of it. When I asked for specifics on what type of filtration systems were required, no one could tell me. When I asked how a grower is supposed to filter smell from outdoor plants and hoop houses with their sides rolled up, no one could tell me. When I complained to one county official about the impact of the smell on my home and property value, I was told "this is here to stay. If you don't like it, then move."

So I took their advice, and considered walking away from my home of 20 years and moving. The appraiser who appraised my property told me that the presence of agricultural cannabis may reduce property value for surrounding properties by 10-30% or more --- mainly due to the smell.

If an ACRE (or less) of cannabis produces constant, noxious smells at my home 2,000 feet away, I can only imagine what TEN ACRES would be like, both for me and for the unfortunate people who live in the general vicinity of operations like this. Opening up cannabis operations to the level proposed by the County would be a tragic disservice to the people of this community who trust and depend on our elected representatives to protect our welfare and quality of life.

Thank you for your consideration.

Katie Moore
2855 Fulton Road
Fulton, CA 95439
707-322-0171
Watermarkfarm1@yahoo.com



Katie Moore
Principal
The Energy Alliance Association, Inc. (TEAA)
1415 Fulton Road #476
Santa Rosa, CA 95403
Cell: 707-322-0171

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From: [district5](#)
To: [Cannabis](#)
Cc: [Leo Chyi](#)
Subject: FW: Constituent Matter: Cannabis Ordinance
Date: Tuesday, March 16, 2021 11:01:33 AM

JW

-----Original Message-----

From: no-reply@sonoma-county.org <no-reply@sonoma-county.org>
Sent: Monday, March 15, 2021 2:07 PM
To: district5 <district5@sonoma-county.org>
Subject: Constituent Matter: Cannabis Ordinance

Sent To: County of Sonoma
Topic: Constituent Matter
Subject: Cannabis Ordinance

Message: As a life-long resident of Sonoma County, I am writing to notify you of my extreme dissatisfaction with the possible cannabis ordinance changes you are considering. Making the cannabis applications ministerial instead of requiring environmental review for individual projects is a sure way to downgrade and detrimentally change what makes Sonoma County so pristine and special. Giving up individual oversight is a lazy and troublesome way of dealing with the new industry. Notice I say industry, because I don't feel cannabis cultivation should be considered agriculture and should not be eligible to right-to-farm law.

It is important that Sonoma County listen to their most ardent caretakers of rural areas and make INDIVIDUAL decisions for projects that have considerations about the uses of water, disruption of wildlife, noise/lighting pollution, security and potential crime, hoop houses and a preponderance of plastic, ODOR, and the idea of cannabis events with all that that will entail.

I am not against the cannabis industry. But judicious regulation is important. Why are you against individual permitting?

It is important that you listen to your people! You are embarking on a path that can make Sonoma County a leader in thoughtful innovation of a new industry, or you can make us the poster county for ways other counties decide not to go!

Thank you.

Maureen McCaffrey Gradek
Healdsburg
maureengradek@marcomjobs.com

Sender's Name: Maureen Gradek
Sender's Email: maureengradek@marcomjobs.com
Sender's Home Phone: 707-756-5009
Sender's Address:
307 Greens Drive
Healdsburg, CA 95448

From: [Moir Jacobs](#)
To: [Cannabis](#)
Subject: Fwd: Town Hall questions and video
Date: Tuesday, March 16, 2021 3:13:44 PM

EXTERNAL

Hello McCall Miller,

You should not include citizen emails on these comment pages, that is a violation of privacy rules.

You could easily take out the last column and remove the personal emails of everyone at once. It's a very easy thing to do, I'm happy to teach you how to do it.

You can include names, but private emails should be removed.

Please confirm it will be done.

Thank you,
Moir Jacobs

The Q & A from the town halls are Attachment G and Attachment G Addendum to the Planning Commission Staff Report and are available here:

<https://sonomacounty.ca.gov/Cannabis/Legislative-Updates/County-Ordinances/>.

You may use this link to access the Zoom Video Recordings for the four Virtual Town Halls: <https://share.sonoma-county.org/link/hA3Qc7Uqc3k/>. Let me know if you have trouble accessing the content.

McCall Miller

Sonoma County Cannabis Program

County Administrator's Office

Cannabis@sonoma-county.org

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From: [Owlsnest](#)
To: [Cannabis](#)
Subject: Cannabis regulations
Date: Tuesday, March 16, 2021 9:08:29 AM

EXTERNAL

I am writing to strongly oppose a vote to make Cannabis an agricultural crop. This will open up acreage properties to growing Cannabis on 10% of their land. Needless to say, this will impact the wildlife, those living around large pieces of land and perhaps increase criminal behavior. Please do not pass this ordinance. Pot is not an agricultural crop.

Thank you.

Marcia

Marcia Johnson
1460 Big Cedar Lane
Sebastopol, CA 95472
owlsnesttwo@att.net

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From: [Scott Orr](#)
To: [Cannabis; PlanningAgency](#)
Subject: FW: Proposed Cannabis Ordinance Changes
Date: Tuesday, March 16, 2021 9:15:02 AM

From: Greg Carr <Greg.Carr@sonoma-county.org>
Sent: Tuesday, March 16, 2021 8:39 AM
To: Scott Orr <Scott.Orr@sonoma-county.org>
Subject: Fw: Proposed Cannabis Ordinance Changes

From: Marcy Meadows <marcym1@comcast.net>
Sent: Monday, March 15, 2021 10:47 PM
To: Greg Carr; Larry Reed; Gina Belforte; Cameron Mauritson; Pamela Davis
Subject: Proposed Cannabis Ordinance Changes

EXTERNAL

After attending the community Zoom presentation on Fri., I came away with some very strong concerns about the proposed changes that will affect the quality of life in Sonoma County.

1. The proposed setbacks do not protect the health and quality of life of those who have the misfortune of having property adjacent to a 10 or more acre agricultural parcel.

I strongly support 1000' setback from Property Lines for all residential properties adjacent to an eligible cannabis grow property as well as 1000' setback for all schools, nursery schools, parks, Class I Bike paths and drug rehab facilities.

The residents of Sonoma County do not deserve to have the quality of their lives, their health and the full enjoyment and usage of their property ruined by having a cannabis grow within 300' of their dwelling just because their elected officials want an easier to administer cannabis ordinance.

Please Don't Ruin the beauty and quality of life Sonoma County is known for.

2. **Water usage.** Most residence adjacent to Ag land depend on wells for their water. The entire town of Graton is on individual wells. Water thirsty Cannabis operations have already been known to cause wells to dry up on properties they share property lines with.

Water conservation is essential as we move into ever drier weather conditions. Limiting rather than hugely increasing the number of acres of water gobbling crops like Cannabis only makes environmental sense.

3. Alignment with Ca State Cannabis Regulations

How does declaring Cannabis an Agricultural **crop** bring Sonoma County into alignment with the state's classification of Cannabis as a **commodity**, not as a crop?

Thank you for taking the time to include this in your considerations of how your decision will affect all of Sonoma County, not just the Cannabis industry.

Marcy Meadows
2609 S Edison
Graton, CA 95444

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From: [marcus.pizzorno](#)
To: [Cannabis](#)
Subject: The Scourge of Drugs
Date: Tuesday, March 16, 2021 10:06:13 PM

EXTERNAL

Dear Commissioner:

I grew up in a large city. I know that drugs are a scourge to any area. I've seen the theft and vandalism associated with marijuana. I have never ever seen any benefit from the drug culture associated with growing marijuana.

The armed guards to protect the pot crops.

The permanent pollution associated with the heavy over fertilization of the pot crops.

The transient trimmings that pot crops bring to an area.

If you doubt these concerns, then you are, at best, ill informed or in denial.

My young daughters live here. How do you tell them to stay off drugs and then allow something like this into our neighborhoods?

Allowing even 1 acre of pot farming would be criminally negligent.

This is not the will of the people.

If passed, we will tie this up in court until the next election.

I vote

In need of you to the right thing for your constituents,

Marcus Pizzorno, 32 year land owner in Sonoma County

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From: [Keith Roberts](#)
To: [Cannabis](#)
Subject: FW: Public comments
Date: Tuesday, March 16, 2021 1:37:59 PM

Keith Roberts
Community Relations Specialist for
James Gore, 4th District Supervisor
County of Sonoma

From: Matt Shotwell <matthewshotwell@gmail.com>
Sent: Tuesday, March 16, 2021 1:21 PM
To: district4 <district4@sonoma-county.org>
Subject: Public comments

EXTERNAL

As a voting citizen of Sonoma County, I am urging our Agriculture Department and Board of Supervisors to draft language to the draft Sonoma County Cannabis Ordinance that provides a clear pipeline and pathway for our Sonoma County Legacy Cultivators and that our Board of Supervisors adopts language that aligns cannabis our county's cannabis regulations with the state's cannabis regulations.

Below are specific changes to the draft ordinance that I would like to discuss.

Generally, references for indoor and greenhouse cultivation should be omitted or specifically referred to Chapter 26. Several sections include discussion of indoor and greenhouse cultivation, which is not applicable to the proposed chapter. This is noted in Sections 38.12.030, 38.12.040, 38.12.060 and other sections.

Section 38.12.040 – Setbacks.

Comment: Chapter 26 Section [26-88-254\(f\)\(6\)](#) includes language:

“This park setback may be reduced with a use permit when it is determined that an actual physical equivalent separation exists due to topography, vegetation or slope, that no offsite impacts will occur, and that the cannabis operation is not accessible or visible from the park.”

While proposed Chapter 38, Section 38.12.040 does not include this language. It seems proposed Chapter 26 should at least point to Chapter 38, so the applicant can choose the ministerial permit pathway.

Comment: Section 38.12.040.A.3. appears to conflict with Section 38.12.010.D.3. While Section 38.12.040.A.3. states “outdoor or hoop house cultivation, the cultivation area must be set back a minimum of 1,000 from the property line of a parcel.... with a public park of Class I Bikeway...”, but Section 38.12.010.D.3. states “no outdoor canopy can be visible from a public right of way”. Which is it? Is it both? If both, then clarifying language should be placed in both sections.

Section 38.12.050 – Protection of Historic and Cultural Resources

Comment: Section 38.12.050 states:

“A use permit will be required if mitigation is recommended by the cultural resource survey or local tribe.”

There are various levels of mitigation recommended by cultural resource surveys, which can place restrictions on where construction can occur or that a monitor needs to be present. Minor and non-invasive mitigation measures should not trigger a discretionary permit.

Section 38.12.060 – Tree, Timberland, and Farmland Protection

Comment: Section 38.12.060 does not allow for diseased or fire damage trees to be removed. A licensed arborist can be required to determine if the tree(s) is diseased or fire-damaged and allow for removal by a license professional.

Section 38.12.070 – Protection of Biotic Resources

Comment: Section 38.12.070.A.3. states:

“A use permit will be required if the qualified biologist in the biotic resources assessment required by this chapter recommends mitigation measures.”

Biotic resource assessment invariably has recommendations for mitigation measures, but these vary in degree. Recommended mitigation measure can be that construction cannot occur during a specific time with noise levels above a certain level or if trees are to be trimmed,

a biologist must first confirm the absence of nesting birds.
Non-invasive mitigation measures should not trigger a discretionary permit.

Comment: Section 38.12.070.C. states:

“Cannabis cultivation and related structures and development cannot be located within Biotic Habitat Combining Zone, pursuant to Section 26-66 of Chapter 26 of the Sonoma County Code.”

However, Section [26-66-020](#) – Standards for biotic habitats states:

“A biotic resource assessment to develop mitigation measures may be required where the Director determines that a discretionary project could adversely impact a designated habitat area.”

In keeping with the requirements of Chapter 26, Section [26-66-020](#), cultivation proposed with a Biotic Habitat Combining Zone should simply trigger a discretionary permit application.

Section 38.12.080 – Fire Protection and Hazardous Materials

Comment: Section 38.12.080.A. states:

“The fire prevention plan must state how the development will comply with chapters 13 and 13A of this code, and”

Perhaps, for clarification and continuity of the language within this proposed chapter, it should state:

“The fire prevention plan must state how the development will comply with chapters 13 and 13A of the Sonoma County Code”

Respectfully,
Matt Shotwell
Greenwell Group
Native Tree Farms

Sent from my iPhone

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From: [Wendy Smit](#)
To: [Cannabis](#)
Cc: [Wendy Smit](#)
Subject: Cannabis Land Use Ordinance and General Plan Amendments Comment Letter from CNPS
Date: Tuesday, March 16, 2021 3:43:34 PM
Attachments: [CNPS Cannabis letter.pdf](#)

EXTERNAL

Dear Mr. Miller,

Attached is a letter from the Milo Baker Chapter of the California Native Plant Society.
My contact information is:

Wendy Smit
President
707 481-3765
wsmit8000@gmail.com

Mailing address is:
Milo Baker- CNPS
P.O. Box 892
Santa Rosa, CA 95402

Thank you for your consideration of this information. Please pass it along to the Planning Commission.

Wendy

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March 17, 2021

Planning Commission
c/o McCall Miller - Department Analyst
Cannabis Program, County Administrator's Office

RE: Amendments to the County Code, Chapter 26 and new Chapter 38, to allow expanded ministerial permitting for commercial cannabis cultivation in agricultural and resource zoned areas

Dear Mr. Miller:

On behalf of the Milo Baker Chapter (Sonoma County) of the California Native Plant Society (CNPS), thank you for the opportunity to share our comments on the Sonoma County Cannabis Land Use Ordinance Update and General Plan Amendment. The Milo Baker Chapter is dedicated to protecting native plants and their habitats in Sonoma County. This letter addresses the concerns we have regarding the County of Sonoma's proposed general plan amendment to include cannabis within the definition of agriculture. A Subsequent Mitigated Negative Declaration is proposed to be adopted pursuant to the California Environmental Quality Act (CEQA) and State and County CEQA Guidelines. Sonoma County has stated that the draft Subsequent Mitigated Negative Declaration for the Sonoma County Cannabis Land Use Ordinance Update has found that the proposed ordinance amendments and general plan amendment as written will not have a significant effect upon the environment.

While we appreciate the scope and intent of the County's ordinance, we have provided some comments in an effort to better achieve the purpose of the ordinance. The issues that are of concern are as follows:

Ministerial versus full California Environmental Quality Act Review

Ministerial permits have minimal review and protections. Generally, they require a public official to determine only that the project conforms to the applicable zoning and building code requirements and that applicable fees have been paid. In a County as ecologically diverse as Sonoma County many projects have unique site characteristics that would benefit from discretionary review where site specific parameters could help the cannabis applicant protect the environment while developing their agricultural property.

We recommend that the review should be a discretionary review not ministerial.

The current proposal requires review by the California Department of Fish and Wildlife (CDFW) only for state listed species or for a lake or stream bed alteration.

There are many other species that have been identified as being rare or species of special concern by CDFW, California Native Plant Society and the Native Plant Protections Act (NPPA). For example, the CNPS, which works closely with CDFW, has several plant rankings that include the following:

- 1A. Presumed extirpated in California and either rare or extinct elsewhere
- 1B. Rare or Endangered in California and elsewhere
- 2A. Presumed extirpated in California, but more common elsewhere
- 2B. Rare or Endangered in California, but more common elsewhere.
3. Plants for which we need more information - Review list
4. Plants of limited distribution - Watch list

Species of Special Concern, a designation under CDFW, should be used in the entire document, not just listed species as they pertain to the California Endangered Species Act (CESA), or the Federal Endangered Species Act (FESA).

The listing of a species is the last resort to prevent loss of the species from the ecosystem. In addition, it does not address loss of Sensitive Natural Communities identified by CDFW. As a result, those species and vegetation communities that are on watch lists identified in the CDFW Special Plants and Animals lists and the VNPS lists should be evaluated as well.

We recommend that Sonoma County include the expanded definition of rare, endangered and Species of Special Concern plants and vegetative communities into the ordinance.

Establishes expanded ministerial permitting in Agricultural and Resource zoning designations (Land Intensive Agriculture (LIA), Land Extensive Agriculture (LEA), Diverse Agriculture (DA), and Resources and Rural Development (RRD)) within the unincorporated area of Sonoma County.

This ordinance should only apply to properties zoned as Agriculture. There should be no ministerial permits allowed on properties zoned Resource and Rural Development (RRD) or other non-agriculture zoned parcels. This would require additional review of the impact and the incremental impacts of developing more properties into agricultural properties than the general plan envisioned or accounted for in its programmatic EIR. Many properties have been zoned RRD because of the steep slopes, special site conditions, or other conditions that make the property impractical to develop into a standard agricultural operation. Applying over-the-counter ministerial permits for agriculture outside of agricultural zones is inappropriate and could lead to loss of critical habitat, further impacts to already degraded streams and a decrease in stored carbon throughout our county, further exacerbating the impacts of climate change.

We recommend that Sonoma County restrict the use of ministerial permits to those projects that are already within existing agriculture zoned land.

Expands the cannabis cultivation area allowed per parcel from 1 acre to 10 percent of the parcel.

If the County continued to allow this type of land conversion in RRD zoned parcels, we would have significant concerns about allowing properties to develop up to 10% of the parcel for cultivation through a ministerial process. This could exponentially develop large swaths of land for cultivation with just a ministerial review. Many acres of vegetation communities would be lost with no mitigation. Sonoma County does not have adequate baseline information on the current acreages of vegetation communities to address the loss of communities in the future. As stated in the Mitigated Negative Declaration, up to 657,534 acres are identified as being within the expanded definition of Ag and Resource zoning, stated above, and greater than 10 acres. With the new ordinance, the potential 65,753 acres to be developed in Sonoma County is too much.

We recommend that Sonoma County reduce the allowed acreage to be developed to 1% of a parcel if in RRD and only 4% of the parcel if the ministerial permit process is used.

A biotic assessment be prepared by a County approved qualified biologist concluding that the project would not result in impacts or “take” of protected plant and animal species is required for projects with or adjacent to native habitat areas. If the biotic resources assessment recommends mitigation measures a use permit will be required.

We strongly support this approach, but would like to see that these assessments be made public and sent to entities requesting to review these documents, including the Milo Baker Chapter of CNPS.

The updated ordinance will require compliance with minor and major timberland conversion provisions per State law.

Any land use application to the Zoning of Forest Land (FL), and/or Timber Production Zone (TPZ) that requires the removal of trees as part of the project is a conversion of timber lands and is subject to environmental review (Full EIR under CEQA – with the County of Sonoma being the lead agency). The current ordinance (in place) and proposed ordinance allow for administrative permitting in these zonings.

We recommend that Sonoma County restrict the permitting to Agricultural Zoned parcels to avoid potential impacts to native plants and plant populations. County Staff cannot be experts in all the issues that occur on these land types and a biological review should be conducted.

As identified in the Ordinances Mitigated Negative Declaration, neither the County's tree protection ordinance nor provisions in the updated Ordinance would ensure that such trees are replaced after removal occurs, and that replacement trees are fully protected during project activities.

Although the updated Ordinance states the following:

A. Tree Protection.

- 1. Non-Forested Area Required.** Cannabis cultivation and associated development can only be located on a site that was non-forested as of December 20, 2016, except that trees may be removed in compliance with subsections 2 and 3, below.
- 2. Trees Generally.** No tree greater than 20 inches at diameter breast height (dbh) can be removed to accommodate cannabis cultivation or associated development. Cannabis cultivation and related development must avoid any tree greater than 20 inches at diameter breast height by 1.5 times the dripline.
- 3. Protected Trees.** No protected tree greater than 9 inches at diameter breast height can be removed to accommodate cannabis cultivation or related development.
- 4. Tree Avoidance.** Any tree that cannot be removed under subsection 2 or 3, above, must be avoided by 1.5 times the length of the dripline.

Although, the updated Ordinance prohibits the removal of protected trees greater than nine inches at diameter breast height (dbh) and any tree greater than 20 inches dbh, neither the County's tree protection ordinance nor provisions in the updated Ordinance would ensure that individual trees are replaced after potential removal occurs, and that replacement trees are fully protected during project activities.

The updated Ordinance may result in a loss of trees that is inconsistent with local policies and ordinances. Mitigation would require the replacement of protected trees if removed from cultivation sites. As a result, development of the site with any native trees will require a Use Permit.

We recommend that Sonoma County adopt the following:

1. There should be no removal of heritage trees through this permit process. Heritage trees, as identified in the Sonoma County General Plan, have often lived for hundreds of years and are often seed source for local plant populations and habitat for local wildlife.
2. It should be state that no more than 15% of a site's native tree canopy can be removed through this permit process. This would protect native woodlands on properties that are being regulated through the ministerial permit. This would be an easily enforced regulation in that an aerial survey of the site can be done remotely and accurately. All removed trees should be accounted for in an arborists report that designates the species name and dbh.

The updated Ordinance includes a standard that requires development of cannabis cultivation and related structures to be located only outside the Biotic Habitat Combining Zone, pursuant to

Section 26-66, of Chapter 26 of the Sonoma County Code. With adherence to this standard, and those described under criterion a, impacts to sensitive natural communities would be less than significant.

Sensitive vegetation communities, as defined by CDFW, occur in areas that are outside of the Biotic Habitat Combining Zone. Sonoma County has not mapped all of the vegetation communities within the County. As a result, the development of cannabis cultivation in these areas could result in the loss of sensitive communities.

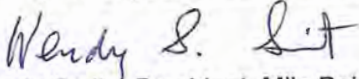
We recommend that Sonoma County only issue ministerial permits on parcels and in areas already under some type of cultivation. If an applicant wishes to develop a parcel or part of a parcel that does not meet this definition, then the applicant should have to conduct a full CEQA process and have all the potential impacts studied at the cost of the applicant.

The Ordinance does not require an overall evaluation of water use per grow, processing or workers use. A database should be created to track the use of water per grow site, per area and by overall County use.

With climate change and the lowering of the water table due to population growth and other agricultural practices this will be an important component in the evaluation for new grow areas. The California Water Board Cannabis small irrigation use prohibits cannabis cultivators from diverting surface water during the dry season forbearance period, from April 1 through October 31 of each calendar year. This means that water used for cannabis cultivation activities must be diverted to off-stream storage during the wet season to be used during the dry season. To obtain a California Department of Food and Agriculture Cannabis Cultivation (CalCannabis) License, you must provide documentation of your water supply source(s) with your cultivation license application. Unclear regulatory frameworks and inconsistencies between State and County policies poses a major barrier to compliance for small-scale farmers in particular as identified by the UC Berkeley Cannabis Research Center.

We recommend that Sonoma County require that all proposed grows in Sonoma County meet the CalCannabis license requirements.

Thank you for your considerations.



Wendy Smit – President, Milo Baker Chapter

California Native Plant Society

Wsmit8000@gmail.com

From: [Sandeep Bhandari](#)
To: [Cannabis](#); [David Rabbitt](#)
Subject: We oppose expansion of Cannabis farming without understanding full Environmental Impact
Date: Tuesday, March 16, 2021 10:25:01 AM
Attachments: [Cannabis Comment v2 2.pdf](#)

EXTERNAL

Hello Mr Miller and Mr Rabbitt,

I am attaching a letter explaining our concern and an absolute need for full Environmental Impact rstudy. We live on Herrerias Way in Petaluma and had to deal with the illegal cannabis growth practically in our backyard causing many health issues for us and my father. Our quality of life was significantly affected with thee pungent smells and air quality issues during Cannabis grow and harvest seasons.

We urge you to take the time to have a proper scientific evaluation of the environmental and community impact of cannabis farming before any ordinance for expansion of cannabis farms are approved.

Regards

Neera and Sandeep Bhandari

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March 14, 2021

SUBMITTED VIA E-MAIL

McCall Miller

Sonoma County Planning Commission

Cannabis Program, County Administrator's Office

575 Administrative Drive, Suite 104A

Santa Rosa

California, 95403

Cannabis@sonoma-county.org

Re: Comment on proposed modification of cannabis ordinance, No. 6245, and General Plan update.

Dear McCall Miller,

Thank you for the opportunity to comment on the proposed ordinance and general plan modifications for cannabis. At the outset, we would like to make clear that this letter does not dispute the utility or value of cannabis – within reason, cannabis farmers should be allowed to grow their crops. However, the new cannabis commercialization laws cannot be to the detriment of existing homeowners in Sonoma County (Sonoma). Phase 2 of the ordinance modification was to be a “thorough” review of neighborhood compatibility issues,¹ and Sonoma has abdicated its duty to listen to, and protect, its residents. This comment letter will specifically address:

- Sonoma's failure to prepare an Environmental Impact Report (EIR) under the California Environmental Quality Act (CEQA),
- Sonoma's failure to adequately mitigate odor and air quality concerns,
- Sonoma's failure to account for the serious water use concerns related to cannabis growing in California,
- Sonoma's failure to maintain proper fire safe road regulations, and
- The classification of cannabis as an agricultural crop.

I. Sonoma should have prepared an EIR.

¹ County of Sonoma, *Sonoma County Cannabis*, <https://sonomacounty.ca.gov/Cannabis/Legislative-Updates/County-Ordinances/> (last visited March 14, 2021).

Proper CEQA review is of vital importance – both to address environmental impacts and also to facilitate a flow of information between government officials and the public.² A full EIR provides a framework through which to analyze the other issues contained in this letter,³ and increases public trust in the democratic process.⁴ Sonoma’s failure to follow proper CEQA process has fostered distrust in its motivations at pushing through an inadequately analyzed ordinance and placed the county’s air and water quality in peril.

CEQA is “to be interpreted in such manner as to afford the fullest possible protection to the environment within the reasonable scope of the statutory language.”⁵ The threshold to requiring an EIR is “low,” and any ambiguity should be resolved in favor of environmental review.⁶ CEQA review only ends at the mitigated negative declaration step when potentially significant environmental effects can be fully mitigated by changes in the project and the project applicant agrees to incorporate those changes.⁷

Sonoma has not afforded our air and water the fullest possible protections that CEQA requires. By prematurely ending environmental review at the mitigated negative declaration stage, Sonoma has failed to analyze several potentially significant impacts and has offered inadequate mitigations.

The impacts of the proposed ordinance modification are huge. Sonoma is proposing to increase the amount of land available for cannabis farming from 50 acres to approximately 65,000 acres, a *1300 factor increase*. For reference, that acreage exceeds the total acreage of vineyards in Sonoma.⁸ Sonoma has rightly conceded that there will be impacts on various parts of the environment, notably our air and water – but its conclusion that the vast acreage of new cannabis grows can be mitigated so well that the impacts will not be significant is not supported by substantial evidence. Some of the most prominent problems are discussed below in sections II-IV.

² Cal. Pub. Res. Code § 21000.

³ *See id.* § 21002.1.

⁴ *Laurel Heights Improvement Assn. v. Regents of Univ. of Cal.*, 47 Cal. 3d 376, 392 (1988), as modified on denial of reh'g (Jan. 26, 1989) (The EIR is also intended “to demonstrate to an apprehensive citizenry that the agency has, in fact, analyzed and considered the ecological implications of its action”).

⁵ *Id.* at 390.

⁶ *Save the Agoura Cornell Knoll v. City of Agoura Hills*, 46 Cal. App. 5th 665, 676 (2020), *reh'g denied* (Apr. 10, 2020), *review denied* (June 24, 2020).

⁷ *Id.* at 1186-87.

⁸ *See* Bill Swindell, *North Coast vineyard acreage increases slightly in 2018*, *The North Bay Business Journal* (2018), <https://www.northbaybusinessjournal.com/article/industry-news/north-coast-vineyard-acreage-increases-slightly-in-2018/> (figures from 2018).

Sonoma's decision not to prepare an EIR is at odds to other counties in California. For example, Yolo County prepared an EIR when enacting a cannabis land use ordinance.⁹ Humboldt County and Trinity County have also recently prepared EIRs for commercial cannabis laws.¹⁰

In Yolo County, far less acreage was at stake for cannabis grows, but the county nevertheless responded fairly and capably to community concerns with a comprehensive 700-page EIR.¹¹ In contrast, Sonoma's reaction to public input has been sadly lacking – very few of the reasonable suggestions of the public have been incorporated in the final draft ordinance – and the Planning Commission has attempted to evade full environmental review of its actions.

Sonoma should follow the precedent set by other counties, err on the side of environmental caution and public inclusion, and prepare an EIR. We urge Sonoma to reconsider its decision to prematurely stop CEQA at the negative declaration phase.

II. Sonoma's anemic mitigation strategies will not alleviate the threat to air quality.

Toxic air quality is the number one environmental issue that needed to be addressed in Phase 2 of the cannabis ordinance modification. It is primarily a health issue, as well as an aesthetic issue, and the proposed setbacks do nothing to mitigate either concern.

Cannabis plants emit potent volatile organic compounds (VOCs) in the form of terpenes. Each plant emits roughly 2.6g per day of VOCs into our air. The VOCs emitted by commercial cannabis operations are not insignificant or innocuous – they are measurable and form a toxic cloud that travels well over a thousand feet then sits stagnant in the air causing serious health problems to those living within its grip. Humboldt County's recent EIR stated that despite efforts to mitigate odor from cannabis operations, the impact on the environment would nevertheless be **significant and unavoidable**.¹² There is no reason to believe Sonoma cannabis will be any less potent than in Humboldt – in fact the effects will likely be worse given the proposed scale of cannabis growing in the county.

A. Cannabis farm emissions lead to serious health concerns.

The residents of Herrerias Way experienced the effects of commercial cannabis grows firsthand in the summer and fall of 2018 when Sonoma allowed two illegal grow operations to spring up in an adjacent lot and harvest crops. All four households on Herrerias Way were severely affected by the VOCs that blew directly into our homes for four months.

⁹ Yolo County, *Draft Environmental Impact Report on the Proposed Cannabis Land Use Ordinance for Yolo County* (2019), available at <https://www.yolocounty.org/government/general-government-departments/community-services/cannabis/cannabis-land-use-ordinance> (Yolo EIR).

¹⁰ Humboldt County, *Amendments to Humboldt County Code Regulating Commercial Cannabis Activities* (2018), available at <https://humboldt.gov/DocumentCenter/View/62689/Humboldt-County-Cannabis-Program-Final-EIR-60mb-PDF>; Trinity County, *Cannabis Program Final Environmental Impact Report* (2020), available at <https://www.trinitycounty.org/node/2609>.

¹¹ Yolo EIR.

¹² Humboldt EIR at 1-3.

The impact on our health was enormous. One resident, a disabled young man with severely limited physical movement could not leave his home without having his lungs pumped. To reiterate: without having his lungs pumped. A second neighbor's asthma condition was exacerbated and they had to seek additional medical treatment. A third resident, who had never previously suffered any respiratory condition had to seek urgent care for burning chest pain, and was diagnosed with lung irritation from the air. They also experienced a constant nausea from the potent cannabis fumes. These medical issues occurred after only a few months of exposure to cannabis fumes from a one-acre grow.

Since Sonoma turned a blind eye to the illegal grows, the Herrerias Way Coalition sued under private nuisance laws and shut down both operations. The medical issues detailed above have since resolved with the elimination of the cannabis grows.

B. Sonoma's setback proposals are wholly inadequate.

Sonoma now countenances expanding the size of outdoor cultivation parcels from one acre – the size that led to the severe health problems described above – to either ten acres or 10% of the size of the parcel. The anemic setback requirements intended to mitigate air quality concerns do not provide adequate protection from the toxic air quality created by cannabis grows.

Commercial growth of cannabis at 300 feet setback from a residence is not founded in any scientific basis and does not provide protection. A 1000-foot setback from the property line of residences is a well-documented and scientifically backed solution to odor control and toxic air quality concerns. Sonoma's continued adherence to setbacks measured from residences instead of property line is a slap in the face to both science and the health of Sonoma residents. Furthermore, such setbacks are outrageous given that many people now work from home and children are schooled at home. People are in their homes 24 hours a day – private residents in that situation would be exposed longer than children in schools who are afforded a 1000-foot setback from the school's property line, and children would be safer at school than in their own homes.

By ignoring public concern at the inadequacy of the proposed setbacks and failing to expand them to a scientifically-backed safe distance from the property line, Sonoma has failed to discharge its duty to protect the health, safety, and welfare of the county's residents. Sonoma must reconsider setback requirements.

C. Sonoma's other mitigation suggestions fail to address odor and air quality concerns.

To be effective, a mitigation proposal must mitigate effects “to a point where clearly no significant effect on the environment would occur” as well as ensuring “there is no substantial evidence in light of the whole record before the public agency that the project, as revised, may have a significant effect on the environment.”¹³

Here, it is far from clear that the mitigation effects will alleviate the environmental impacts to a point where they are clearly not insignificant. For example, Sonoma contends in its

¹³ Cal. Pub. Res. Code § 21064.5.

mitigated declaration that odor and air quality concerns are partially mitigated by the fact that odors are strongest in the two months prior to harvest.¹⁴ This is incorrect and furthermore does nothing to mitigate the odors during those two months. There clearly will be impact during the two months prior to harvest even under Sonoma's blasé assertions. As discussed above, even two months of strong odor and VOCs are enough to cause severe health problems for neighbors. Moreover, some operations have a two harvest per year schedule.

Additionally, Sonoma asserts vegetative screening will mitigate odors.¹⁵ There is not evidence that this approach will effectively block odors from travelling beyond the cannabis operation's boundaries. Vegetation is impermanent and porous, and is easily destroyed by wind or wildfire. Furthermore, wind can blow odors beyond the vegetative screen.

Finally, Sonoma concedes that there are cases where residents will be affected but requires the odor to impact "several" people before it will investigate.¹⁶ Even then, the mitigation measure only provides that Sonoma will require Vapor-Phase Systems (Fog Systems) to neutralize the odor. The problem with this approach is firstly Fog Systems are not designed for large-scale outdoor grows. Second, only the odor will be neutralized, not the VOCs themselves, and the odor-neutralizing chemical will remain in the air as well, which is a potential hazard to public health. Third, if Sonoma realizes there are likely going to be impacts from odors, it should require odor neutralizing technology as standard. Finally, coupled with the potential that cannabis farming will be protected under Right to Farm laws because of the General Plan update, which would shield cannabis operations from nuisance suits, residents will be left with little to no recourse to protect themselves should Sonoma not find the odors are affecting several people. They would have to stand idly by as their health deteriorated and their property value plummeted.

Sonoma's mitigation policies are completely inadequate for the scale of cannabis farming that will take place following this ordinance update. The mitigation measures would only have a chance of success in conjunction with proper setback requirements – only physical distance mitigates cannabis fumes. To better understand the effects of odor and VOCs on human health and to effectively mitigate those dangers, Sonoma should have completed thorough environmental review under CEQA. Furthermore, Sonoma should explicitly state that cannabis farming will never be protected under Right to Farm laws, or any other laws, from individuals bringing private action to abate nuisance.

III. Water use on cannabis crops is a significant environmental impact.

¹⁴ Negative Declaration at 34.

¹⁵ *Id.*

¹⁶ Negative Declaration at 35. Of additional concern is the fact that this process involves discretionary action from Sonoma. There is no definition of "verified complaint," "objectional smell," or "several" people. This discretionary investigation is impermissible under the ministerial system Sonoma envisages.

Cannabis grows require vast quantities of water to operate.¹⁷ One cannabis plant requires at least 6 times the water of one grape plant.¹⁸ To compare again to Sonoma’s wine industry – Sonoma could expand to 6 times as many vineyards as it currently has for the same water cost as the present ordinance affords cannabis. This is highly worrying given that California is prone to severe droughts. Humboldt County found that water demand for cannabis operations created a **significant and unavoidable impact** on public water utilities.¹⁹

Of further concern is the provision of emergency water when there is a local, state, or federally declared disaster.²⁰ This may take water away from much needed communities and Sonoma has provided no analysis of the impacts it would case to residents and the environment. Again, only a full EIR will disclose to the public the environmental impacts to water distribution and water quality, and allow county officials to make the least environmentally damaging choice.

IV. Sonoma must ensure fire road regulations are followed.

Sonoma is at high risk of wildfires, and has seen devastating blazes decimate large areas of the county in recent years. Adding 65,000 acres of a combustible crop, which is frequently surrounded by a high quantity of electrical equipment including generators, lighting, and air purifying systems, is a recipe for disaster. Adding to that, Sonoma has not ensured that existing fire road regulations will be followed.

...

V. Cannabis is not an agricultural crop and should not be given protection under Right to Farm Laws.

Sonoma seeks to designate cannabis as an agricultural crop in its General Plan update. However, this fails to take into account the marked differences between cannabis and other crops. Cannabis requires constant security, including full fencing to keep people out. Its high value attracts crime, and its potent odor creates a nuisance for residents living in the area. Cannabis is also still, federally, a Controlled Substance, which can have harmful effects if abused, especially in teenagers. We strongly urge Sonoma to resist reclassifying cannabis as an agricultural crop.

If Sonoma proceeds with this redefinition, it must ensure that the many legal exemptions agricultural crops enjoy are not applied carte blanche to cannabis. First and foremost, Sonoma must make explicitly clear that the redefinition does not mean cannabis operations will ever be protected under Right to Farm laws. Sonoma residents must continue to be able to file nuisance

¹⁷ Negative Declaration at 94 (Cannabis cultivation “has been characterized as a high-water-demand activity”).

¹⁸ Alexander Nieves & Debra Kahn, *Wine vs. Weed in Napa Valley*, Politico (Feb 18, 2020), available at <https://www.politico.com/news/2020/02/18/wine-vs-weed-in-napa-valley-115322> (citing Napa County report).

¹⁹ Humboldt EIR at 1-4.

²⁰ Negative Declaration at 95.

suits to protect themselves from cannabis operations adjacent to their homes, to protect their health and property value. It is not acceptable to strip that option from private citizens and insulate the cannabis business from liability.

Second, Sonoma must make clear that it cannot in the future use the agriculture label in order to relax setback requirements or expand the cannabis industry beyond what the current definition allows. Enforceable, scientifically backed setback requirements must be in place before cannabis is reclassified, and must remain in place afterwards.

VI. Conclusion

Sonoma has not discharged its duty to protect the health, safety, and welfare of the residents of the County. To ensure that the public's voice is heard, and all environmental impacts are properly disclosed, Sonoma must restart its CEQA analysis and complete a comprehensive EIR. In the EIR Sonoma should reconsider its mitigation strategies for air quality, water quality, and fire safety, because the current plan is inadequate. This should include 1000-foot setbacks measured from the property line of residences, not from homes themselves. Failure to produce an EIR will put Sonoma residents' health in danger and jeopardize property values across the county.

Sonoma should also reconsider its rationale for classifying cannabis as an agricultural crop. If this proposal proceeds, at the very least Sonoma must ensure that residents can still bring private claims to abate the nuisance caused by cannabis odors.

From: [Christina Rivera](#)
To: [Susan Gorin](#); [Arielle Kubu-Jones](#); [Karina Garcia](#)
Cc: [Marcie Woychik](#); [McCall Miller](#); [Cannabis](#)
Subject: RE: Sonoma County Cannabis Ordinance
Date: Tuesday, March 16, 2021 1:52:41 PM
Importance: High

From: Susan Gorin <Susan.Gorin@sonoma-county.org>
Sent: Tuesday, March 16, 2021 1:43 PM
To: Gregory Carr <greg99pole@gmail.com>
Cc: Marcie Woychik <Marcie.Woychik@sonoma-county.org>; Christina Rivera <Christina.Rivera@sonoma-county.org>
Subject: Fwd: Sonoma County Cannabis Ordinance

FYI

Susan Gorin

1st District Supervisor
County of Sonoma

*Be #SonomaSmart – Wash hands, wear masks, keep the distance.
It's all about community.*

575 Administration Drive, Room 100A
Santa Rosa, CA 95403
www.sonoma-county.org
susan.gorin@sonoma-county.org
Direct 707-565-2982
Cell 707-321-2788



Begin forwarded message:

From: Nicole Williams <nicolewilliams@lrteam.org>
Date: March 16, 2021 at 12:32:05 PM PDT
To: Susan Gorin <Susan.Gorin@sonoma-county.org>
Subject: Sonoma County Cannabis Ordinance

EXTERNAL

I am a voting, 30-year Sonoma County resident and I am a proud member of our Sonoma County Cannabis industry. I voted for the legalization of cannabis in California, and I was privileged to help operate and own the longest permitted cannabis dispensary in Sonoma County, Sonoma Patient Group. I took part in helping develop the Teamsters and SRJC Hemp and Cannabis Apprenticeship program in 2019 as I believed that with the Hemp and Cannabis Industry growing larger today than our Airlines industry, cannabis laborers deserve education and training like any other industry. It's my belief that by establishing an ordinance that supports our cannabis industry's growth, Sonoma County will prosper and grow into a leading cannabis region in California.

I personally have been waiting for years for the release of this draft ordinance. I am very proud to see Cannabis cultivation permitting move to the agriculture department as I feel Andrew Smith and his staff understand that Cannabis is an agricultural commodity and should be treated like any other agriculture.

There are several concerns about the draft ordinance that I wanted to address.

Please draft language in the ordinance that will provide a clear pipeline and pathway for the Sonoma County Legacy Cultivators. These cultivators are the people who built our Sonoma County medical cannabis industry and are the farmers still fighting today become fully licensed. These farmers are the heart of our industry and deserve a chance. With the push at a state level to create appellations and develop regional cannabis, our legacy farmers deserve to be a part of this incredible process. These are the farms that have been producing our regional cannabis products for years. Our Sonoma County Agriculture Department has already created a Hemp ordinance that treats it like any other agriculture in our county, so why can't cannabis be treated the same way in our county?

Below are specific changes to the draft ordinance that I would like to discuss.

Generally, references for indoor and greenhouse cultivation should be omitted or specifically referred to Chapter 26. Several sections include discussion of indoor and greenhouse cultivation, which is not applicable to the proposed chapter. This is noted in Sections 38.12.030, 38.12.040, 38.12.060 and other sections.

Section 38.12.040 – Setbacks.

Comment: Chapter 26 Section 26-88-254(f)(6) includes language:

“This park setback may be reduced with a use permit when it is determined that an actual physical equivalent separation exists due to topography, vegetation or slope, that no offsite impacts will occur, and that the cannabis operation is not accessible or visible from the park.”

While proposed Chapter 38, Section 38.12.040 does not include this language. It seems proposed Chapter 26 should at least point to Chapter 38, so the applicant can choose the ministerial permit pathway.

Comment: Section 38.12.040.A.3. appears to conflict with Section 38.12.010.D.3. While Section 38.12.040.A.3. states “outdoor or hoop

house cultivation, the cultivation area must be set back a minimum of 1,000 from the property line of a parcel.... with a public park of Class I Bikeway...”, but Section 38.12.010.D.3. states “no outdoor canopy can be visible from a public right of way”. Which is it? Is it both? If both, then clarifying language should be placed in both sections.

Section 38.12.050 – Protection of Historic and Cultural Resources

Comment: Section 38.12.050 states:

“A use permit will be required if mitigation is recommended by the cultural resource survey or local tribe.”

There are various levels of mitigation recommended by cultural resource surveys, which can place restrictions on where construction can occur or that a monitor needs to be present. Minor and non-invasive mitigation measures should not trigger a discretionary permit.

Section 38.12.060 – Tree, Timberland, and Farmland Protection

Comment: Section 38.12.060 does not allow for diseased or fire damage trees to be removed. A licensed arborist can be required to determine if the tree(s) is diseased or fire-damaged and allow for removal by a license professional.

Section 38.12.070 – Protection of Biotic Resources

Comment: Section 38.12.070.A.3. states:

“A use permit will be required if the qualified biologist in the biotic resources assessment required by this chapter recommends mitigation measures.”

Biotic resource assessment invariably has recommendations for mitigation measures, but these vary in degree. Recommended mitigation measure can be that construction cannot occur during a specific time with noise levels above a certain level or if trees are to be trimmed, a biologist must first confirm the absence of nesting birds. Non-invasive mitigation measures should not trigger a discretionary permit.

Comment: Section 38.12.070.C. states:

“Cannabis cultivation and related structures and development cannot be located within Biotic Habitat Combining Zone, pursuant to Section 26-66 of Chapter 26 of the Sonoma County Code.”

However, Section 26-66-020 – Standards for biotic habitats states:

“A biotic resource assessment to develop mitigation measures may be required where the Director determines that a discretionary project could adversely impact a designated habitat area.”

In keeping with the requirements of Chapter 26, Section 26-66-020, cultivation proposed with a Biotic Habitat Combining Zone should simply trigger a discretionary permit application.

Section 38.12.080 – Fire Protection and Hazardous Materials

Comment: Section 38.12.080.A. states:

“The fire prevention plan must state how the development will comply with chapters 13 and 13A of this code, and”

Perhaps, for clarification and continuity of the language within this proposed chapter, it should state:

“The fire prevention plan must state how the development will comply with chapters 13 and 13A of the Sonoma County Code”

Thank You for your time and dedication towards a Sonoma County Cannabis Ordinance that helps our industry grow and thrive to become a leading region for cannabis in California.

Nicole Williams

Labor Resource Management Inc

837 5th St. Santa Rosa, CA 95404

C: 1 707.492.5244 O: 1 707.303.7575

Email: nicolewilliams@lrteam.org

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From: [Chelsea Holup](#) on behalf of [PlanningAgency](#)
To: [Cannabis](#)
Subject: FW: Cannabis Ordinance
Date: Tuesday, March 16, 2021 1:59:41 PM
Attachments: [Letter to So Co Planning Comm.pdf](#)

From: Ricardo Garcia <RGarcia@catholiccharitiessf.org>
Sent: March 16, 2021 12:39 PM
To: [PlanningAgency](mailto:PlanningAgency@sonoma-county.org) <PlanningAgency@sonoma-county.org>
Subject: Cannabis Ordinance

EXTERNAL

Dear Commissioners,

I am a director of a science camp, summer camp, and day camp that provides education to students year round here in West County. It has come to my attention that you will be reviewing the new county draft ordinance governing cannabis growing. Enacted as written, it is a deeply troubling ordinance that will change the look and character of our county.

The changes proposed are environmentally sweeping and not adequately measured - a few examples being that there is no accounting for over concentration of grows in one area of the county subjecting neighbors to a barrage of odors, security measures, overuse of water, constant business activities.

We have a proposed grow near us, and I am concerned about all of the above issues even though it might be "allowable" being it might 1000 feet away from our property line. That is too close since we have 250 students who use the whole camp area to do their activities while with us. We have very little faith based on the previous ordinance lack of enforcement done by the county, that they will do any better with even broader allowances in this bill. I consider it an "attractive" nuisance possibly drawing the kids unwelcomed attention.

Sweeping changes such as are being proposed require measured steps with lessons learned from the previous missteps and failures that occurred by other counties including our own.

This ordinance needs to be revised and clarified with more protections for the citizens in Sonoma County.

Rick Garcia

Director of CYO Camp and Retreat Center

D | 707-874-0203

Catholic Charities

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CYO Summer Camp
CYO Retreat Center
CYO Outdoor Environmental Education
Caritas Creek at CYO Camp

2136 Bohemian Highway
Occidental, CA 95465
T | 707 874 0200 F | 707 874 0230
CatholicCharitiesSF.org

March 16, 2021

Dear Commissioners,

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Sweeping changes such as are being proposed require measured steps with lessons learned from the previous missteps and failures that occurred by other counties including our own.

This ordinance needs to be revised and clarified with more protections for the citizens in Sonoma County.

If you have any questions or concerns, please contact me directly at 707-494-0619.

Blue Skies,

A handwritten signature in black ink, appearing to read 'R. Garcia', with the date '3-16-21' written to the right of the signature.

Rick Garcia
Catholic Charities CYO Camp Director
rgarcia@catholiccharitiessf.org
707-494-0619 C
707-874-0200 D

A PROGRAM OF  Catholic Charities 

From: [Chelsea Holup](#) on behalf of [PlanningAgency](#)
To: [Cannabis](#)
Subject: FW: Grange meetings with AG commissioner
Date: Tuesday, March 16, 2021 3:36:10 PM

From: Rachel Zierdt <rzierdt@gmail.com>
Sent: March 16, 2021 2:41 PM
To: Andrew Smith <Andrew.Smith@sonoma-county.org>; PlanningAgency <PlanningAgency@sonoma-county.org>
Subject: Grange meetings with AG commissioner

EXTERNAL

Dear staff,

Page 2 of public comments.... Don't have to go too far to see the obvious bias the county has towards the cannabis industry. A cozy letter by Sica to commissioner Andrew.....thanking him for the upcoming meeting she and other Grange members will have Regarding the draft cannabis ordinance. Why were the neighborhood coalitions not given this esteemed, preferential treatment? I hope that the planning commission is taking note of all of this coziness and seeing this draft ordinance for what it is - a one-sided document that really doesn't take into account what's best for the county. It's just what's best for the cannabis industry.

Rachel Zierdt

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Steve Sommer
6029 Dry Creek Rd.
Healdsburg, Ca. 95448

March 8, 2021

Planning Commission
% McCall Miller
Dept. Analyst, Cannabis Program
County Administrators Office
575 Administration Drive, Suite 104 A
Santa Rosa, Ca. 95403

McCall,

I sent this letter by email also....

My name is Steve Sommer. My wife Candy and I have been involved in agriculture for over 45 years. Candy's family has been in agriculture in Dry Creek Valley for over 100 years. I was president of Sonoma County Convention & Visitors bureau, one of founders of Sonoma County Grape Grower and United Wine Growers. I helped develop the Ag Element of the General Plan and the right to farm that now goes in every real estate transaction in Sonoma County. Also one the Alexander Valley Farm Bureau which included the annual Prune Blossom Tour and the Alexander Valley School Board.

Listening to District 5 Linda Hopkins, Chairman of the Board of Supervisors on KSRO recently she was discussing the cannabis cultivation here and her thoughts on it should be in the Agriculture (Ag) Department, the right to farm not in the PRMD.

I hope you realize that "the system" has made it easier to "grow a house" in a agriculture zone than a agricultural business. The best way to keep open space in this county is to keep Agriculture healthy and thriving. I would like to volunteer my time to keep moving Cannabis and Agriculture forward.

Our path is to continue in "agriculture" and supporting all of the supervisors to complete an amendment to put cannabis cultivation in the General Plan, a right to farm thru the Agriculture Dept. We are writing for your assistance in completing our 1-acre cannabis permit. Our permit has been in PRMD for 3 plus years...needless to say how much in revenue would the county had received for its budget, programs for all, etc. if cannabis is identified as a Agricultural business .

Thank you for your support. Do not hesitate to reach out to me.....707-431-8623/
scsommer@earthlink.net.....look forward to hearing from you.



Steve Sommer

From: [Sonia Taylor](#)
To: [Cannabis](#)
Subject: Re: Link to Cannabis Town Hall Meetings
Date: Tuesday, March 16, 2021 1:11:29 PM

EXTERNAL

Please provide me with the links to the video for each of the 4 town hall meetings on the proposed cannabis package that took place during the week of March 8, 2021.

Sonia

Sonia Taylor
707-579-8875
great6@sonic.net

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From: [Tim Bosma](#)
To: [Susan Gorin](#); [Cannabis](#)
Subject: Impacts of Cannabis Proposal on Bennett Valley; Hearing March 18, 2021
Date: Tuesday, March 16, 2021 10:16:20 PM

EXTERNAL

As a former Board member of the Bennett Valley Community Association, the significant environmental impacts this proposal would have on Bennett Valley cause me great concern.

It appears that the CEQA analysis of the Cannabis proposal fails to analyze any of the policies in the Bennett Valley Area Plan, including design review and siting requirements that are required for almost every other project. Design and siting review is completely inappropriate for ministerial permitting and such permitting denies Bennett Valley citizens recourse for their legitimate concerns about the quality of life in their neighborhood.

In 2018 the odors from an illegal grow next door made outdoor activities a miserable experience. This was just a relatively small backyard operation. I wonder how wine country tourists coming here for wine tasting are going to enjoy their experience breathing irritating terpenes and odors from much larger operations. Are you going to make certain there are significant 1,000' or more setbacks to protect wineries and residents in their homes from the odors? That's been a problem in Santa Barbara County. Perhaps the tourists will take their business to Napa County to avoid the cannabis stink in Sonoma County.

When we remodeled our home 10 years ago, we were required to go through an extensive review process because we live in a designated scenic corridor. Now suddenly cannabis producers will be allowed to erect ugly white hoop houses that blight our scenery?

What about our water aquifers being sucked dry? We're in the midst of another drought year. We have several water basin studies in progress. How can the County approve up to tens of thousands of acres of cannabis cultivation without completed water basin studies and an EIR regarding the impact to those depleted water basins?

Let's not forget the narrow roads, noise, and additional vehicular traffic.

A full EIR needs to be conducted.

Please conduct a genuine study of the environmental effects of this massive program by doing an environmental impact report and revise this proposal in a manner that fully addresses the legitimate concerns of Sonoma County residents.

Regards,
Tim Bosma
Sonoma Mountain Road

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From: [district5](#)
To: [Cannabis](#)
Cc: [Leo Chyi](#)
Subject: FW: Proposed Changes to the Cannabis Ordinance, Regulations and Program
Date: Tuesday, March 16, 2021 10:58:08 AM
Attachments: [Cannabis Ordinance Opposition Ltr.docx](#)

From: Virginia Hair <clobloomfield@icloud.com>
Sent: Monday, March 15, 2021 10:33 AM
To: David Rabbitt <David.Rabbitt@sonoma-county.org>; Susan Gorin <Susan.Gorin@sonoma-county.org>; district3 <district3@sonoma-county.org>; district4 <district4@sonoma-county.org>; district5 <district5@sonoma-county.org>
Subject: Proposed Changes to the Cannabis Ordinance, Regulations and Program

EXTERNAL

To The Board of Supervisors
Attached is my letter about the Cannabis Ordinance and Program in Sonoma County.
Thank you for your service.
Virginia Hair

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March 13, 2021

Sonoma County Board of Supervisors: Supervisors David Rabbitt, Susan Gorin,
Chris Coursey, Lynda Hopkins and James Gore
Sonoma County Dept. of Agriculture, Commissioner Andrew Smith
Sonoma County PRMD, Director Tennis Wick
Sonoma County Fire Prevention Division, James Williams
Sonoma County Sheriff, Mark Essick
Sonoma County Counsel, Sita Kuteira
Sonoma County Cannabis Program, Dept. Analyst McCall Miller
Sonoma County Administrator, Sheryl Bratton
Sonoma County Planning Commissioners

RE: Sonoma County Cannabis Ordinances

To Whom It May Concern:

We have lived in and been paying property taxes in Sonoma County since 1984, and have lived at our current address in Bloomfield since 1986. We have spent over half of our lives in this County. We did not anticipate that we would have to spend the latter years of our lives defending the health, safety, peace, comfort, general welfare, and environment of our rural town and the unincorporated areas of the County from the ill conceived Sonoma County Cannabis Ordinance.

Although the Proposition to legalize cannabis in California passed in Sonoma County, 94,475 people voted against the proposition; that is 40.9% of the residents who voted.

We strongly disagree with prior Agriculture Commissioner Tony Linegar's statement to the Press Democrat in December 2019, "We treat cannabis farmers like any other farmers in the county - they're all farmers to us." This quote is in direct contradiction to his previous statement in the newspaper article that they will still be held to additional standards such as security measures required given the high-dollar value and illicit market legacy of the crop. Cannabis is like no other crop in terms of the many problems associated with its cultivation, such as: crime, groundwater depletion, water pollution, traffic on narrow roads, fire safety, odor pollution, evening operations, noise pollution, light pollution and the property devaluation of nearby homes. It is actually not a crop, it is a product, it is a drug.

We request that the County put a moratorium on all cannabis permits until they can draft an ordinance that protects all of the residents of Sonoma County. The current cannabis ordinance, nor the proposed changes to the ordinance, do not accomplish that sacred trust. But, first, the County needs to do the EIR of their cannabis program. We believe that the powerful, well funded cannabis lobby in Sonoma County has had an undue influence on the process and the ordinance.

The permit process for any cannabis cultivation or processing facility should require:

- All permits must go through PRMD (Permit Sonoma) for a Conditional Use Permit. No ministerial permits should be allowed and the Department of Agriculture should not be in charge of cannabis permits.
- The permit process should require:
 - written notification to any adjacent and nearby property owners within 5000 linear feet;
 - a chance for their objections to be heard and addressed;
 - an Environmental Impact Report or a California Environmental Quality Act (CEQA) review.
- All cultivation should only be allowed in greenhouses with carbon filters to control odors, not hoop houses.
- There should be a buffer of a minimum of 1000 feet, property line to property line from any cultivation site, indoor or outdoor, to any rural residence to help mitigate the harmful impacts.
- Wells on cultivation sites should have meters on them and usage must be reported to the county and evaluated for groundwater depletion.
- There should be a buffer of 5000 feet from any unincorporated town.
- The property tax bill of any properties within a mile of an approved cultivation site or processing facility should be reduced by 20% due to the decreased resale value of the property.
- No cultivation site or processing facility should be allowed on streets that are too narrow for fire safety.
- Water and chemical/pesticide run off must be contained as it eventually contaminates the environment, and may go into protected watersheds, creeks, rivers, esteros and finally into our federally protected marine sanctuaries.
- All permits should only be allowed for one year at which time the renewal permit application will be evaluated for impacts, complaints, and compliance. This gives the County time to adequately evaluate the program, the ordinance, problems with the program, problems with the individual permit, and to make decisions about needed changes.
- No cannabis tourism should be allowed.
- All processing facilities should only be allowed in industrial, commercially zoned areas due to the chemicals used in processing, odor pollution, the availability of fire safety resources, and the availability of crime prevention resources.
- Outdoor cultivation runs the risk of killing pets and livestock nearby, especially if animals get onto the property and ingest the cannabis or if seeds from the plant are dispersed and grow on nearby properties.
- The minimum parcel size for any cultivation permit application should be 20 acres, not 10 acres, with a maximum cultivation site of one acre.

I have read online that cannabis growers decry what they state is the onerous nature of the current ordinance. But, it does not keep them from going through the PRMD Conditional Use Permit process that could take several years and cost a substantial amount of resources. This is because the future potential financial gain from an approved permit is so great.

People are coming from other counties and states to take advantage of the County's inadequate ordinance that does not protect the rural residents of the County who bear the unjust burden of the cultivation provisions of the ordinance.

We live in a community of families surrounded by dairies, horse ranches, sheep ranches, cattle ranches, vineyards and farms growing food. I wonder how many growers actually live on their own cultivation site with their families. The members of the LLC that purchased land for a cannabis farm in our town are from out of county. It would destroy our town and ruin the lives of the citizens who reside here, if a permit for cultivation would be allowed. Fortunately, their permit application for a ministerial permit was denied. We do not know if they will pursue a Conditional Use Permit through PRMD.

Two of our neighboring counties, Marin and Napa, have wisely decided not to allow cannabis cultivation, even though their voters also approved the proposition to legalize cannabis. I wish that Sonoma County had made this same decision.

I participated on one of the virtual Town Hall Meetings regarding the proposed changes to the Cannabis Ordinances. I have read all of the written letters that had been sent to the County. I found the letter submitted by Craig Harrison and Ray Krauss to be a very thoughtful and intelligent proposal about how the county should have done the planning process for the cannabis program and ordinance. I hope that everyone at the county involved in this process will actually read their letter and decide that they need to rethink and revise the cannabis program, the planning process and the permit process.

Thank you for your service.

Sincerely,

Virginia Hair

From: [norcal growers](#)
To: [Cannabis](#)
Subject: Cannabis Ordinance Response
Date: Tuesday, March 16, 2021 11:02:24 PM

EXTERNAL

Dear Board of Supervisors and County Staff,

I hope this finds you healthy and safe. We appreciate your attention to the below amendments to the Sonoma County Cannabis Ordinance Draft.

Being in the CUP process for the last four years has been pretty unbelievable, I am a single operator/farmer with great dreams and feel like what I have been through really shouldn't happen. Please think about the farmers and the lives you will affect as you read this. My purpose was to have a small nursery which was already up and running continually for the last 50 years. I wasn't adding or building anything and only changing the plant material that I grew. It took the county 4 years to issue a permit with limitations and recommendations that are cumbersome to say the least. Please look at the recommendations and look at it from a farmers point of view for a moment. Please make the process easier for farmers down the road so we can keep a vibrant agricultural sector. As the industry changes and eventually the declassification of cannabis like hemp. What will we have as farmers embarked on? Four lost years so far! I'm also talking for the 75 Cannabis farmers that have joined the Hessel Grange and feel that we have not been heard throughout this process. Please allow this process to be fair and true to the agricultural sectors, and an incredible industry that can flourish with it.

-You released a draft copy of the zoning regulations and an amendment of the general plan, but they contradict each other.

In the zoning regulations under the definition of "crop production" please remove "except cannabis" to match the General Plan amendment.

-I support and appreciate the change in the General Plan to classify cannabis as agriculture.

After reviewing the Chapter 38 draft ordinance, I have the following comments:

-Please align the Sonoma Cannabis Ordinance where applicable to state laws.

-As state laws continue to evolve, the Sonoma County ordinance should change with it.

-Nurseries should be prioritized as there is a local supply chain shortage and traveling and spending monies outside our county. That is money that is leaving our county and creating unnecessary carbon impact. Let's keep our money and our farming in Sonoma County.

-Please clarify that the new ordinance removes the sqft. cap on nurseries

-Please create an advisory committee for cannabis or agriculture in general. There must be more transparency between county staff and the industry.

-Please create a pipeline for the original applicants that have been stuck in line at PRMD. Give priority to them without additional fees. They were supposed to have a head start and get priority processing, but are stuck in queue. Now you are allowing 10% canopy without getting them permits first.

-I support 5-year permits and the allowance of ministerial permits in LIA and RRD.

-I would like to see RR and AR added back, as a right to farm in Sonoma County. (Small farming is essential in our agricultural county.)

-Please release the site-specific environmental documents that will be used to satisfy CEQA at the state level.

-The state already has strict enough restrictions for water use. Please remove the new water restrictions you have added and treat us like other agriculture commodities.

-Please don't put caps on propagation. If it is used on-site, it should not be limited by square footage. Plants grow very quickly and must be held until they are used. We have strain banks and Mother Stock that must be kept alive. This requires extra space.

-Regarding the language around forests in 2016, please allow an exception for areas deforested via wildfires. These areas no longer have living trees on them and should not be disqualified.

-Please link interactive maps for the "Important Farmlands" and "Critical Watersheds" so those areas are known and easily referenced in the Sonoma County Code.

-Please remove the requirements for plant screening of Cannabis farms. (Other crops are not subjected to this) They draw attention to the fact that there is a cannabis farm behind a fence as opposed to a horse or dog, they cost extra money, and they use extra water.

-Please remove the requirement of carbon/air filters for indoor, greenhouse and nurseries on ag and resource properties. These smells are already mitigated by large parcel sizes. Also, many if not all of these properties will be eligible for outdoor growing making the filters a moot point. They are expensive and a waste of carbon and energy resources. Lastly, hemp is now allowed and also smells the same as cannabis, because they are essentially the exact same plant.

-Please remove the requirement for an emergency to be government declared (Example: There may be a power outage on a single parcel that will still create an emergency for that farmer. They must be able to pump water or turn on lights to save their crop.)

-Please treat us like other ag and don't threaten us with misdemeanors.

Don't give "Stop Work" orders unless there is due process. This may allow a whole year's worth of crop to be lost over a misunderstanding. This should only occur during the most serious offense and after arbitration.

-We should be allowed to truck in recycled water to reduce pressure on groundwater. It should actually be encouraged. Water catchment systems should also be incentivized.

-Please remove the plant count (25 Plants) for cottage outdoor permits. - Align with the state which has removed the plant count.

-How will the county deal with the Board of Forestry's new Fire Safe Ordinance? Will farms be required to have 20 foot wide roads? Will that only be required if there is new construction? Or are you changing the zoning code to classify us as an agricultural crop?

-Will Self-Transportation be allowed for cultivators?

-Will Self-Transport be allowed for Nursery Operators?

-How will renewals be handled?

Thank you for the considerable staff time it took to organize and edit these documents. I look forward to continuing to advocate for the cannabis industry.

Sincerely,

Vince Scholten

President - Hessel Grange #750

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From: [Janus MATTHES](#)
To: [Greg Carr](#); [Pamela Davis](#); [Cameron Mauritson](#); [Larry Reed](#); [Gina Belforte](#); [PlanningAgency](#); [Cannabis](#); [district4](#); [David Rabbitt](#); [district5](#); [Susan Gorin](#); [Chris Coursey](#); [Tennis Wick](#)
Subject: Cannabis Revisions Proposed
Date: Tuesday, March 16, 2021 10:38:10 AM
Attachments: [WWW March 2021 Cannabis proposed changes.docx](#)

EXTERNAL



www.winewaterwatch.org

Regarding: Proposed Cannabis Regulations

March 15, 2021

To: Sonoma County Planning Commissioners – Admin Record for March 18, 2021 Hearing

greg.carr@sonoma-county.org

pamela.davis@sonoma-county.org

cameron.mauritson@sonoma-county.org

larry.reed@sonoma-county.org

gina.belforte@sonoma-county.org

planningagency@sonoma-county.org

cannabis@sonoma-county.org

CC: district4@sonoma-county.org; ,

David.Rabbitt@sonoma-county.org

district5@sonoma-county.org,

Susan.Gorin@sonoma-county.org

chris.coursey@sonoma-county.org

Tennis.Wick@sonoma-county.org

Wine and Water Watch is a local organization of over 250 citizens concerned with ethical land and water use. We oppose the industrialization of our neighborhoods for commercial cannabis cultivation, threat to our watersheds, groundwater depletion, water quality, cannabis tasting rooms and cannabis tourism that Sonoma County is allowing to continue despite numerous problems including out of compliance with state regulations.

WWW had numerous attendees at the “listening” workshops and were extremely disappointed at the format and questions that were asked as being totally biased to sway the public into acquiescence. Not one of members attending had questions discussed at either workshop. 30 days for review is NOT enough time. We request an extension. No public review is a nonstarter for county residents.

We are in a megadrought! The proposed regulations do not address the millions of gallons of water that will be siphoned off for this new industry that uses 6 times more water than the already water thirsty vineyards? NOAA has declared our area in a drought in 2020. The loopholes in the proposed cannabis regulations would allow for more deficit groundwater pumping as recycled water is only available to a small part of the county. Diversions will further the lack of water sources and increase the threat of more fires. With 24% of Sonoma County having already been burnt in the last few years, where is the current science to allow such poor judgement?

The state has declared by law that cannabis is NOT a crop and therefore a product. Is the County ready to litigate? Right to farm does not apply to this crop and residents can file an appeal for 3 years. State laws overrule County laws.

We find:

1. The **Ag Commissioner was one year and 9 months releasing the 2019 Crop Report due to understaffing and underfunding so why would County give more responsibilities unless that is part of the strategy to accommodate the industry with lack enforcement and monitoring? State says cannabis is not a crop so move this over to Permit Sonoma as a use permit. "All decisions of the Agricultural Commissioner under this chapter are final, subject only to judicial review." This is a setup for disaster and takes power away from private citizens to giving added benefits to the industry.**
2. **Weak enforcement giving growers a heads-up that the County is coming monitor lacks transparency and gives the public concern that the regulations are useless and will not be enforced.**
3. **Public concerns. Why no public options that could revoke growers out of compliance and remove to have their license revoked?**
4. **Allowing water use in water scarce areas is negligence and a Public Trust issue. West County and Healdsburg areas are already trucking in water.**
5. **Biological Resources in Chapter 38 qualified biologist will be at the discretion of county staffers who also regularly use 40-year-old drilling logs to issue new well permits and traffic studies 8 years old. Why the disdain for current science? A full EIR must be conducted before any regulations are authorized.**
6. According to ABAG our county has the least restrictions to commercial grows than any of the other 8 counties in the Bay Area. Napa (82-page report) has said no to commercial cultivation as has 4 other counties due to the myriad of problems exposed. San Mateo is allowing a short-term project before making any regulations as unintended consequences WILL occur. You are allowing a 5-year permit. Why are we not giving one-year permits, a public hearing before growers are allowed a full 5 year permit?
7. What bonds for cleanup of environmental degradation have been set up? Figures show that Santa Barbara and Humboldt counties grow enough cannabis to supply the entire USA. There will be many failures, where is the clean up fund?
8. Residents already are receiving buyout offers from out of state and area growers furthering unaffordability in the county. 65,000 acres of potential grow sites even with 19% coverage will make home affordability even further out of reach. We have the third highest homeless population in the nation. Why is this social issue not being part of the mitigation? This is another cumulative impact not addressed. You can't have it both ways.
9. Safety issues. Twenty-Two home invasions occurred from January 2018 to August 2018. This should raise alarm bells, where is the county on this?
10. **In February, the federal National Marine Fisheries Service within the Biden Administration wrote [a letter to the County of Sonoma](#) listing their concerns with the proposed cannabis ordinance. The letter stated that the current proposal "the current standards and requirements appear unlikely**

to adequately mitigate the potential impact of streamflow depletion, making a MND inappropriate”. As it is apparent the ordinance is inadequate, what is the county doing to prevent harm to endangered and threatened salmon species? Taxpayers subsidize these recovery efforts.

11. **The letter from NOAA expressing** grave concern about the lack of studies and understanding about cumulative impacts that will occur unless exclusion zones for water scarce areas such as zones 3 and 4 are enacted. All hydrological tests must be done during low water times in September and October to determine sustainable levels for native fish to survive and done not more than 2 years prior to be trustworthy and scientific. There can be no exceptions.
12. Reduced setbacks are only going to make more problems for people who live here. There have been so many complaints and yet the county wants to reduce setbacks? This is going to cause even more problems. Once again county officials are turning their backs on residents in favor of industry.

In summary, the County needs to extend the public review process and must have regulations that allow for public review and hearings at every juncture, so this industry does not overburden our dwindling resources and right to a reasonable quality of life for tax paying residents. A 30-day review for such an impactful industry is not enough time for a thorough public review when urgent cumulative impacts and CEQA analysis has not been attempted. We must have a cumulative report countywide to make decisions that will impact so many lives and not put monetary considerations before the lives of future generations.

We remind the county that past crops include potatoes, hops, prunes, peaches, poultry, pears, hay, apples and others were not able to survive economic and environmental realities. To quote David Keller, “We’ve harvested redwood, fir, salmon, eel, otters, seals, whales, murre eggs, ducks and egrets, mercury and gravel until resources were exhausted. Water is now subject to competing commercial, municipal, marijuana, wine and agricultural demands, all increasingly pitted against survival of native salmon.” And we would add, survival of the county residents. What will be left?

Sincerely,

Wine & Water Watch Board Members:

Janus Matthes, Merrilyn Joyce, Tom Conlon, Deb Preston, Dr. Shepherd Bliss, Pamela Singer, Judith Joinville, Charlotte Williams, Sarah Ryan

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www.winewaterwatch.org

Regarding: Proposed Cannabis Regulations

March 15, 2021

To: Sonoma County Planning Commissioners – Admin Record for March 18, 2021
Hearing

greg.carr@sonoma-county.org
pamela.davis@sonoma-county.org
cameron.mauritson@sonoma-county.org
larry.reed@sonoma-county.org
gina.belforte@sonoma-county.org
planningagency@sonoma-county.org
cannabis@sonoma-county.org

CC: district4@sonoma-county.org; ,
David.Rabbitt@sonoma-county.org
district5@sonoma-county.org,
Susan.Gorin@sonoma-county.org
chris.coursey@sonoma-county.org
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Sincerely,

Wine & Water Watch Board Members:

Janus Matthes, Merrilyn Joyce, Tom Conlon, Deb Preston, Dr. Shepherd Bliss, Pamela Singer, Judith Joinville, Charlotte Williams, Sarah Ryan

From: [Bridget Beytagh](#)
To: [Pamela Davis](#)
Cc: [Cannabis](#)
Subject: Fwd: Update
Date: Wednesday, March 17, 2021 11:45:23 AM

EXTERNAL

Begin forwarded message:

From: Bridget Beytagh <beytagh@sonic.net>
Subject: Update
Date: March 17, 2021 at 11:11:49 AM PDT
To: Bridget Beytagh <beytagh@sonic.net>
Cc: Anna Ransome <ransome@sonic.net>

Dear Planning Commissioners, I am writing to you because many aspects of the update are detrimental to residents of Sonoma County, and to the environment.

300 feet from a neighbors house is not nearly enough, as we know that odor travels much further than that. 1000 ft is a compromise that reduces the effect on the neighbor, but still allows the applicant to operate. Humbolt County has 1000ft buffer zones around residential zones in unincorporated areas. This will help towards the goal of ensuring that odor stops at the property line. Distance has been shown to be the most effective way of reducing odor.

20 acre parcels would make the above a lot easier to achieve and there are approx. 4500 of them allowing for ample production to supply our local businesses.

Measurements for setbacks must be from the property line so that the neighbor does not have to give up the right to enjoy their property. No homeowner should have to absorb a setback to accommodate a commercial operation.

The County has removed the Health and Safety section - ..."and ensure that enviromental, public health, safety and nuisance factors related to the cannabis industry are adequately addressed." Removing this is clearly against the public good and only benefits industry.

Hoop houses should not have electrical and plumbing infrastructure. They are left uncovered at night causing light pollution, use vast amounts of plastic, double or treble the amount of

water used, divert water, look ugly and at 12 ft high can be seen over the inadequate screening required. Neither tourists nor residents should have to look at that amount of plastic.
This can be done in commercial areas.

The County states that adding 65000 acres to cannabis production would have...” less than significant impact” - how can that be even remotely true?

A study done for Napa County states that 1 acre of cannabis needs 1.100,000 galls of water.
With 2-3 crops a year this would be a massive increase in water use.

The County should ensure that all CEQA and EIR requirements are followed - the SMD is inadequate.

Cannabis is classified as an agricultural product - not a crop, The County should align with State law on this.

I support the production of cannabis, but, unfortunately the County only consulted with industry on this, resulting in a very flawed update that has done nothing to address the problems of Neighborhood Compatibility that the BOS promised It needs redoing.

Thank you
Bridget Beytagh

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From: [Claire Burson](#)
To: [Cannabis](#)
Cc: [Susan Gorin](#)
Subject: Cannabis grow on 1575 Sonoma Mtn Rd
Date: Friday, March 12, 2021 8:33:38 AM

EXTERNAL

I think cannabis grow should be only allowed to be grown in agricultural not rural residential. The smell makes me sick

Sent from my iPhone

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From: [Erich Pearson](#)
To: [Pamela Davis](#); [Gregory N Carr](#); [Gina Belforte](#); cameron@mauritsonfarms.com; [David Rabbitt](#); [Lynda Hopkins](#); [Chris Coursey](#); [Susan Gorin](#); [Susan Gorin](#); [James Gore](#); [district4](#); sonomafogg@aol.com; [Tennis Wick](#); [Andrew Smith](#); [Pat Gilardi](#); [Liz Hamon](#); [Stuart Tiffen](#); [Leo Chyi](#); [Sean Hamlin](#); larry@reedgilliland.com; [McCall Miller](#); [Sita Kuteira](#); [Tracy Cunha](#); [Scott Orr](#); [Jennifer Klein](#); [Georgia McDaniel](#); [Jenny Chamberlain](#); [Jennifer Mendoza](#); PamDavis707@fastmail.com; johnlowryca@gmail.com; pcook@ch-sc.org; todd@tamuraenv.com; [Andrea Krout](#)
Cc: [Erin Gore](#); [Ron Ferraro](#); [Alexa Rae Wall](#); [Joe Rogoway](#); [Dennis Hunter](#); [Tony Linegar](#); [Nick Papadopoulos](#); [Arthur Deicke](#)
Subject: Cannabis Ordinance Update Community Concerns
Date: Wednesday, March 17, 2021 6:30:25 AM
Attachments: [CBASC Policy Feedback \(3.16.22- final\).pdf](#)
[SCFB Comments- Planning Commission 03152021.pdf](#)

EXTERNAL

Hello,

Please find attached letters.

-erich pearson

Cannabis Business Alliance of Sonoma County, "CBASC"

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March 16, 2021

To: County of Sonoma Board of Supervisors
County of Sonoma Planning Commission
Sonoma County Dept. of Agriculture/Weights and Measures
Permit Sonoma

Memo: Cannabis industry feedback on proposed language for cannabis cultivation ordinance changes

Dear Planning Commissioners and Supervisors of Sonoma County,

The Cannabis Business Association of Sonoma County (“CBASC”) is comprised of over 100 licensed cannabis cultivators, manufacturers, distributors, and retailers who are tax-paying businesses here in Sonoma County. Our members are experts in the cannabis industry because, amongst other things, we are governed by state and local cannabis regulations and we are in a unique position to understand how these regulations impact the cannabis industry. Relevant to this correspondence, CBASC’s purpose is to advocate for responsible cannabis policies to be implemented in Sonoma County which creates a sustainable supply chain and equitable economic opportunity for our businesses, their employees, and the broader Sonoma County community.

We appreciate the County’s intent to enact common sense amendments to the existing Sonoma County Cannabis Ordinance, but we believe that the proposed amendments fail to achieve that intent in several regards as discussed further below. This is due, in part, because of the County’s failure to include cannabis industry stakeholders in the recent drafting process leading up to these proposed amendments.

Tellingly, the ordinance does not address any cannabis operator who has been in the system through penalty relief for the past four years waiting out this process. As you may know from our prior correspondence and “listening sessions”, these operators have had their livelihoods destroyed by the dysfunctional County process and preposterously restrictive local regulations. First and foremost, our recommendation is to prioritize these penalty relief applicants and ensure they have an expedited pathway to full County permitting.



Overall, we can perhaps most succinctly state our position as being aligned with the position articulated by the Farm Bureau of Sonoma County (the “Farm Bureau Position”; letter attached for your reference). As you can see from the Farm Bureau Position, and CBASC agrees, cannabis should not receive disparate local regulatory treatment from how the County treats other agricultural activities. This uniformity of County regulatory treatment applies to water use, grading, events, and direct to consumer sales.

Below, you will find a list of our specific concerns, recommended changes, and justification for the change. These issues and proposed changes have already been recommended to staff but were evidently ignored during the amendment drafting process.

The timing of these amendments is also unfortunate, specifically as related to cultivators, because they are left with an exceedingly small window to attempt a successful 2021 growing season. Assuming there will be further delays of these proposed changes, we will lose yet another growing season to County dysfunction which will invariably cause even more operators to face severe financial hardship and perhaps the loss of what would otherwise be licensed, tax-paying businesses.

The last four years were some of the hardest economic years for agriculture in Sonoma County. With droughts, fires, floods, fires, and the pandemic, farmers’ livelihoods of all industries have been challenged. By merely aligning our local cannabis ordinance with existing state law and treating cannabis the same as other agricultural activities, we have an opportunity to not only alleviate these extreme financial pressures, but to also build a sustainable local industry which creates equitable employment opportunities for our communities and significant revenue streams from cannabis related tourism.

By adopting the changes we suggest below, the County has an opportunity to choose policy over politics. We are hopeful that the County will finally begin to treat locally licensed cannabis businesses as true partners in our community. This can be accomplished by legislating sound local regulations which provides for real opportunities to operate successful businesses. This, in turn, will drive revenue streams back to not only the County, but importantly, many other businesses and households within the County. This is a virtuous cycle which can only be accomplished through meaningful policy amendments such as those articulated below as well as is described the Farm Bureau’s Position.



What can be done now?

Considering the County has delayed the public release of this draft ordinance and the document in its present form is ambiguous, poorly constructed and enforcement may be challenged; the County should accept the following sections that deal with the process (Sections 38, Article 02; Section 38, Article 04; Section 38, Article 06; Section 38, Article 08; Section 38, Article 10 and Section 38, Article 12 - with some revisions) and allow the handful of cannabis cultivators ready to begin operations the opportunity to cultivate this year. As well, current CUP applicants desperately needs a fair process to switch to a ministerial one, and their applications processed first. Then, working with stakeholders who understand the cannabis industry and the public concerned with cannabis cultivation, review and more completely build out, or eliminate the remaining articles.

Regards,

A handwritten signature in blue ink, appearing to read 'E. Pearson', written over a light blue horizontal line.

Erich Pearson
CBASC Board Chair

Specific Comments and Recommended Changes to Proposed Cannabis Ordinance

Setbacks

Eliminate setback on commonly owned parcels. We don't need to be set back from ourselves, we like cannabis!

Eliminate 300' setback to homes commonly owned.

Change 1000' setbacks from "linear parks" as this discourages property owners from supporting much needed bike trails.

Alignment with State Law – Distribution and Microbusiness License Types

Allow for distribution licenses ("self distro") for farmers on ag land.

Allow for microbusiness license for farmers on ag land.

These are commonly used licenses that allow farmers to manage their supply chain. This creates lower overall costs and the foundation of a direct to consumer business model.

Path for CUP to convert to ministerial



There MUST be a path for current CUP participants to convert to ministerial immediately with no new onerous regulations.

Tax Fee Calculation Needs Overhaul

Restructure the tax calculation to align to industry practices.

The current tax rate has farmers paying up to 2x more than the original 3% intended. This encourages illicit market sales.

Tax rate should be set to 1% of Gross Receipts.

Renewal and Land Entitlement

5 year CUP for Centralized Processing needs to convert to land entitlement forever.

Expansions should be allowed on grandfathered sites so long as footprints expands away from sensitive use. Grandfathering provisions need to apply to permit renewals as well.

Fee Overhaul for Stacking Permits

The Dept. of Ag needs to re-access fees on multi-permits of parcels with multiple 10,000 sf permits. Currently the fees are more than Ag's costs and will only get more out of line with 10% stacking of permits.

Penalty Reductions

Per previous requests of Ad-hoc, the ordinance should include penalty reductions. The current penalties are punitive and treat the industry unfairly. We request that penalties be aligned to other ag industries.

Prohibit Drone Use for Code Enforcement

Code Enforcement should not be allowed to use drones on licensed operators. Inspections should be consistent with state policy and other ag crop policies. Utilizing drones is traumatic to the operator and any animals they may have, and create a hostile partnership.

Hoop House Changes

Allow for year-round hoop houses to reduce waste. This limitation is not based on agriculture needs or environmental considerations. Hoop houses are a vital part of agriculture and should be allowed to remain in place so long as they are maintained. And, they protect cannabis from vineyard overspray, a concern of grape and cannabis farmers.

Cultural Resource Survey

Delete this regulation completely. This regulation is onerous and will delay and possibly prevent cannabis cultivation. No other agriculture crop is required to do a Cultural Resource Survey and we are concerned this regulation will eventually be imposed on all of agriculture. By including the words "involving ground disturbance" all forms of planting and soil preparation could be deemed ground disturbance. Under CEQA, any site development that requires a building permit will be tasked with doing a cultural survey. This process would be managed through Permit Sonoma who has staff versed on CEQA, and not the Dept. of Ag.



Tree Protection

Delete this section completely. Within the County Code is Chapter 26D – Heritage and Landmark Trees, a long-standing ordinance applies to all land uses and would apply to cannabis cultivation. Further, County leadership has indicated that in May they will have a workshop to discuss expanding the existing tree ordinance that will likely inform the general plan update. Having specific regulations for one county commodity that differs from all other commodities or land-uses will only lead to confusion and conflict between two county departments that have regulatory oversight for the same purpose.

Fire Protection

Delete this section completely. The County’s Fire Prevention and Hazardous Materials division is part of Permit Sonoma and this division is responsible for fire safety codes and regulations for the entire County. It is ineffective to dictate requirements within this ordinance for a specific, relatively small land use. The ordinance reads that “an application under this chapter shall include a fire prevention plan for construction and ongoing operations”. A fire protection plan for construction is vague, but most likely any construction would demand a building permit which already has a requirement for a fire protection plan. Suggesting a fire protection plan is needed for “ongoing operations” – again, is vague and is discriminatory against this one industry. Further, these regulations proposed may differ from the County’s fire safety ordinances that are currently going through an approval process through the State Board of Forestry. This regulation is unnecessary and will likely cause confusion and differences in regulatory interpretation between the Ag Commissioner’s office and other regulatory agencies.

Lighting

Eliminate the requirement that lighting cannot spill over to the night sky; rewrite this section with more defined requirements. Eliminate the requirement for a lighting plan. What will be the scientific metrics to measure all these requirements within this regulation? And, given the cultivation is on a minimum of 10 acres, spillage into the night sky is going to have little to no effect on the cultivation’s surroundings. This section is poorly written and is missing needed parameters to fully develop the intent.

Dust Control

Delete this regulation completely. Farming is dusty – it is a given. Requiring a Dust Control Plan – and then eventually enforcing that plan, is incomprehensible and impossible. There should be no regulatory requirements related to dust control.

Water Use

Eliminate this section by pointing to the regulatory agencies that already manage water use. There are already local and state regulatory agencies that manage water use in our County. The California Sustainable Groundwater Management Act (SGMA) protects ground water, and with three of our water basins, Sonoma Water is in the middle of developing Groundwater



Sustainability Plans that will dictate water use, water fees and monitoring requirements. The State Water Board, through their regional offices have control over surface water use including streams, rivers, reservoirs, and ponds. Permit Sonoma has determined water scarce areas within our County and has regulations in place for these areas. The requirements from these water-centric regulatory agencies supersede anything the Ag Commissioner believes he can regulate. Should you continue with the regulations outlined in the Ordinance, this entire section should be rewritten, organized, and simplified. It appears to have a “cut and paste” project from various sources. Getting input from a water engineer may be helpful.

Events

The approach to events that support agriculture should be global and apply to all crops and commodities. Through Permit Sonoma, the County is about to complete their effort to develop a Winery Event Policy and the requirements and regulations within this document should be used to manage all agriculture events in the County. There should be standard policies governing events for all agricultural crops and commodities to allow for fair enforcement and consideration of events.

Retail in Agriculture Zones with Conditional Use Permit

Currently prohibited in the zoning map. By allowing retail in agriculture zones you are allowing farmers to create a Direct to Consumer experience for that farmer to retail their farm products from their farm to the locals and tourists who seek cannabis as a healthier lifestyle and want to meet the maker of the product and savor the terroir of Sonoma County. This is a vital economic opportunity that has minimal implications because it will be required to go through the conditional use permit process. Without this change though, there is not the opportunity for retail in agricultural zones and therefore this will lead to less economic diversity and equitable opportunity across the county.



SONOMA COUNTY FARM BUREAU

Affiliated with California Farm Bureau Federation and American Farm Bureau Federation

March 15, 2021

County of Sonoma Planning Commission
Permit Sonoma
2550 Ventura Avenue
Santa Rosa, CA 95403

Dear Commissioners,

Sonoma County Farm Bureau, a general farm organization representing nearly 2,000 family farmers, ranchers, rural landowners, and agricultural businesses in Sonoma County works to promote and protect policies that provide for a prosperous local economy while preserving natural resources and a long-standing county agricultural heritage.

We have reviewed the draft Chapter 38, Sonoma County Commercial Cannabis Cultivation in Agricultural and Resource Areas Ordinance and are concerned about the overreaching regulations being proposed.

Beliefs, Questions and Comments:

- **Considering that the County of Sonoma is proposing a general plan amendment to include cannabis within the meaning of agriculture, the Sonoma County Farm Bureau Board of Directors is concerned that regulations outlined in this ordinance will inevitably be forced onto other agriculture crops. Comments included in this document are primarily provided because of this concern.**
- **The Sonoma County Farm Bureau Board is opposed to the County's recommendation to recognize cannabis as an agriculture crop since it is not recognized as an agriculture crop by the federal government.**
- Even though we do not support cannabis being considered an agriculture crop in our County, we do find several of the regulations in this Ordinance to be nearly impossible to comply with and not in the spirit of legalizing cannabis grows. If the Ag Commissioner makes it difficult to get permitted grows locally it will lead to the continuation of illegal grows in our County.
- Clearly, the County's first attempt to regulate cannabis cultivation failed because of onerous regulations and a convoluted permitting process. The current plan to move cannabis cultivation out of Permit Sonoma and instead to have the cannabis cultivation administered by the Ag Commissioner makes sense. However, the County should start over with development of this ordinance rather than making amendments to the regulations adopted in 2016 that did not work. It was clear from the public forum that the County is suggesting that there are "minor" to "medium" amendments that are being proposed in Chapter 38 that should not even be discussion points, but these regulations that originated in Chapter 26 are flawed and need to be thoroughly vetted.
- **It is a travesty that the County staff took so long to release the draft of the Cannabis Ordinance. It puts small cannabis cultivation businesses in a position to begrudgingly accept whatever poorly written, overreaching, and vague regulations have been developed for fear of losing the 2021 growing season which starts in a few months.**

- Big picture...39 states already recognize cannabis as a crop although the federal government does not. As mentioned, Sonoma County Farm Bureau through its Cannabis Guiding Principles does not recognize cannabis as an agriculture crop but an agriculture commodity. It is likely with the current administration that the U.S. government will declare cannabis an agriculture crop. What will the County of Sonoma do then? If the County has determined that cannabis is an ag crop (Farm Bureau disagrees) and since cannabis is an annual crop (not perennial) then the County should be prepared to treat it as it does all other row or pasture crops.

Specific Comments:

Section 38.12.030 – Limitation on Canopy and Structures.

A. Canopy Limitations

Recommendation: Allow cultivation canopy to cover 10% of a property owned by a sole landowner rather than segmenting it by parcels.

Justification: All would agree that cannabis cultivation is best suited for large properties that have few neighbors and vast space to allow for a grow to be less conspicuous. Often, ranches and farms are made up of several parcels. Allowing a landowner to manage a cultivation site based on the entire property (ie clustering) will allow for more efficiency and less environmental disturbance.

Section 36.12.040 – Limitation on Canopy and Structures.

Chapter 36 in the Sonoma County Code is titled, "Vineyard and Orchard Development and Agriculture Grading and Drainage". Is this really an amendment to this section?

A. Setbacks for Outdoor and Hoop House Cultivation

Recommendation: An exception to the 100-foot setback requirement should be made if the adjacent parcels are owned by the landowner who has authorized the cannabis cultivation site.

Justification: As discussed above, allowing a landowner with several contiguous parcels to manage their cultivation site wholistically allows for efficiency and optimal land management.

Section 38.12.050 – Protection of Historic and Cultural Resources.

C. Cultural Resource Survey

Recommendation: Delete this regulation completely.

Justification: This regulation is onerous and will delay and possibly prevent cannabis cultivation. No other agriculture crop is required to do a Cultural Resource Survey and we are concerned this regulation will eventually be imposed on all of agriculture. By including the words "involving ground disturbance" all forms of planting and soil preparation could be deemed ground disturbance. Under CEQA, any site development that requires a building permit will be tasked with doing a cultural survey. This process would be managed through Permit Sonoma who has staff versed on CEQA.

Section 38.12.060 – Tree, Timberland, and Farmland Protection.

A. Tree Protection

Recommendation: Delete this section completely.

Justification: Within the County Code is Chapter 26D – Heritage and Landmark Trees, a long-standing ordinance applies to all land uses and would apply to cannabis cultivation. Further, County leadership has indicated that in May they will have a workshop to discuss expanding the existing tree ordinance that will likely inform the general plan update. Having specific regulations for one county commodity that differs from all other commodities or land-uses will only lead to confusion and conflict between two county departments that have regulatory oversight for the same purpose.

Section 38.12.070 – Protection of Biotic Resources.

A. Habitat and Special Status Species.

Recommendation: Eliminate the requirement for a Biotic Resource Assessment.

Justification: The protection of habitat and special status species falls under various state agencies who have the expertise and existing regulations to manage endangered or threatened species. The Ag Commissioner does not have this level of expertise and likely would look to the subject experts within the state agencies to evaluate the danger to biotic resources once the costly assessment has been completed. Let the agencies tasked with the protection of these specific natural resources do their jobs and to apply regulations on cannabis as they would any other commodity.

Section 38.12.080 – Fire Protection.

Recommendation: Delete this section completely.

Justification: The County’s Fire Prevention and Hazardous Materials division is part of Permit Sonoma and this division is responsible for fire safety codes and regulations for the entire County. It is ineffective to dictate requirements within this ordinance for a specific, relatively small land use. The ordinance reads that “an application under this chapter shall include a fire prevention plan for construction and ongoing operations”. A fire protection plan for construction is vague, but most likely any construction would demand a building permit which already has a requirement for a fire protection plan. Suggesting a fire protection plan is needed for “ongoing operations” – again, is vague and is discriminatory against this one industry. Further, these regulations proposed may differ from the County’s fire safety ordinances that are currently going through an approval process through the State Board of Forestry. This regulation is unnecessary and will likely cause confusion and differences in regulatory interpretation between the Ag Commissioner’s office and other regulatory agencies.

Section 38.12.090 – Slope and Grading Limitations.

- A. Slope Limitation.
- B. Grading Limits.

Recommendation: Restate to require cannabis cultivations to follow Chapter 36, Vineyard and Orchard Development and Agricultural Grading and Drainage (VESCO)

Justification: The County has effective regulations in place related to slope and grading requirements for grape cultivation. It is possible that growers who already follow the VESCO requirements for vineyards will have cannabis grows. Do not complicate cultivation and overburden County staff with differing regulations.

C. Ridgetop Protection.

Recommendation: Delete this regulation completely.

Justification: Similar regulations are not required of other agriculture crops and a precedent should not be started with cannabis cultivation. Also, cultivated lands act as fire breaks during wildfires and having protections like this on our ridgelines is an asset.

Section 38.12.010 – Design, Lighting, Security and Screening.

B. Lighting.

Recommendation: Eliminate the requirement that lighting cannot spill over to the night sky; rewrite this section with more defined requirements. Eliminate the requirement for a lighting plan.

Justification: What will be the scientific metrics to measure all these requirements within this regulation? And, given the grow is on a minimum of 10 acres, spillage into the night sky is going to have little to no effect on the grow's surroundings. This section is poorly written and is missing needed parameters to fully develop the intent.

D. Fencing, Screening, Visibility.

Recommendation: Identify that purpose for this section is related to security to prevent other agriculture crops from eventually having similar requirements.

Justification: Sonoma County is proud of its agriculture industry and some of our farmers and ranchers pride themselves on their crops and livestock, often allowing the public to enjoy their tolls by having unscreened fencing. Some of our plant crops do not even have security fencing because they are costly and unnecessary. Farm Bureau is concerned that these regulations will eventually be imposed on all of agriculture if there is not a distinction made as to the security concerns with cannabis cultivation.

Section 38.12.110 – Air Quality and Odor.

A. Dust Control.

Recommendation: Delete this regulation completely.

Justification: Farming is dusty – it is a given. Requiring a Dust Control Plan – and then eventually enforcing that plan, is incomprehensible and impossible. There should be no regulatory requirements related to dust control.

B. Filtration and Ventilation.

Recommendation: Delete this regulation completely.

Justification: There are many agriculture crops that have odors associated with production. It is part of farming and food production. Developing odor standards for one agriculture commodity is going to create a slippery slope for all of Sonoma County's agriculture crops. Odor from cannabis is seasonal and, like other crops, should be tolerated in the interest of having working lands and open space. In addition, what sort of metrics are going to be used to confirm a cultivator is complying and is this really an expertise that the Ag Commissioner's office has?

C. Energy Use.

Recommendation: Delete this regulation completely.

Justification: The requirement to have all 100% renewable energy source and the inability to use a generator will make it infeasible to have a cultivation site in the more remote areas of our County. Isn't this counterintuitive to what the NIMBYs and county officials want? Until the County has developed their Climate Action Plan and provided the infrastructure needed to have an on-grid 100% renewable energy source, there should be no requirements put

on any small business to meet these demands. The inability to use generators for day-to-day operations as needed again flies against the desire to have cannabis grows in the unpopulated areas of our county. Many agriculture crops depend on generators for frost protection, irrigation, and other farming practices.

An option could be to require whisper generators, noise reducing housing structures and/or propane generators depending on the concern with this power source.

Should the Ordinance stand as-is and only allow a generator for cannabis cultivation during a declared emergency, it should be clearly defined in writing in this section that a Public Safety Power Shutoff (PSPS) is considered an emergency and cultivators can use generators during PSPS.

Section 38.12.120 – Waste Management.

Recommendation: Delete this regulation completely.

Justification: No other agriculture crops or commodities are required to submit a waste management plan; therefore, this should not be imposed on the cannabis industry. How costly will this be for the Ag Commissioner's office to regulate and, except for chemical waste, what sort of expertise does this department have on waste? In addition, in order to get a state permit to grown cannabis, a waste management plan must be submitted and approved.

Section 38.12.130 – Wastewater and Runoff.

Recommendation: Delete this regulation completely.

Justification: There are two local Regional Water Boards that have jurisdiction over wastewater and runoff and the State Waterboard already oversees wastewater through the state cannabis cultivation permitting process. They are the experts in this subject area and have in place permitting requirements associated with vineyards, wineries, horse operations and dairies. Surface water runoff and wastewater management BMPs varies by regions within our County and the specific anomalies of our various watersheds is managed by the state agencies. We have the Russian River TMDL and the Petaluma River TMDL which has more stringent requirements than the rest of the County and it is likely that some of these grows will be subject to BMPs associated with these plans. Further, portable toilets are allowed in construction and other agriculture processes, why should cannabis cultivation be subject to different requirements?

Section 38.12.140 – Water Use.

Recommendation: Eliminate this section by pointing to the regulatory agencies that already manage water use.

Justification: There are already local and state regulatory agencies that manage water use in our County. The California Sustainable Groundwater Management Act (SGMA) protects ground water, and with three of our water basins, Sonoma Water is in the middle of developing Groundwater Sustainability Plans that will dictate water use, water fees and monitoring requirements. The State Water Board, through their regional offices have control over surface water use including streams, rivers, reservoirs, and ponds. Permit Sonoma has determined water scarce areas within our County and has regulations in place for these areas. The requirements from these water-centric regulatory agencies supersede anything the Ag Commissioner believes he can regulate.

Should you continue with the regulations outlined in the Ordinance, this entire section should be rewritten, organized, and simplified. It appears to have a "cut and paste" project from various sources. Getting input from a water engineer may be helpful.

Section 38.14.020 – Activities Allowed with a Ministerial Permit

A. Hours of Operation.

Recommendation: Allow all functions of cannabis cultivation to operate 24 hours per day.

Justification: Farming and cultivation tends to be seasonal, and deliveries, shipping and processing activities should have no limitations. The need to immediately harvest a crop, the ability to allow employees to work during the cooler early morning hours and the harvest frenzy that puts a strain on resources requires growers to have flexibility with their hours of operation.

F. Events

Recommendation: The approach to events that support agriculture should be global and apply to all crops and commodities. Through Permit Sonoma, the County is about to complete their effort to develop a Winery Event Policy and the requirements and regulations within this document should be used to manage all agriculture events in the County.

Justification: There should be standard policies governing events for all agricultural crops and commodities to allow for fair enforcement and consistency.

Items not Covered in the Draft Ordinance:

Retail Sales: To allow for the farm to consumer experience that Sonoma County's agriculture industry is known for, the cannabis industry should be allowed to do retail sales at their cultivation site. Through a Conditional Use Permit, the retail sales function could be managed and regulated based on policies and requirements already in place for other retail sales business sectors.

Conflict with other Agriculture Crops: Implied, but not expressed, there should be a written clarification that the cultivation of cannabis cannot restrict or deny the production of other ag crops or commodities in the surround area. All farming practices have best management practices that need to be followed and one crop should not prevent these BMPs from occurring for another crop.

To protect existing, traditional crops that may be located near a grow, cannabis cultivators should be required to file an attestation document that acknowledges that they have evaluated the adjacent land uses or potential land uses and is accepting the risk and liability associated with potential contamination or damages from neighboring crops.

Right to Farm Ordinance: Until cannabis cultivation is a federally recognized crop, the Sonoma County Right to Farm Ordinance should not apply to cannabis cultivation. As stated, even though the County sees cannabis as an agriculture crop, the Sonoma County Farm Bureau recognizes it as a commodity. **We request the Ordinance state that cannabis cultivation will be recognized as an agriculture crop by the County of Sonoma and thus under the umbrella of the Right to Farm Ordinance only when it has been declared an agricultural crop by the federal government.**

Mitigation Fund: We have had years of illegal cannabis grows that have had damaging environmental impacts, created unmanaged waste and unfortunately, for those growers seeking permits, has created a negative stigmatism around cannabis cultivation. **The County should develop a funding process either by setting aside tax monies and/or by assessing cultivators to clean-up and restore lands that have been impacted by unregulated cannabis operations.**

What should the Planning Commission and the Board of Supervisors do?

Considering the County has delayed the public release of this draft ordinance and the document in its present form is ambiguous, poorly constructed and enforcement may be challenged; **the County should accept the following sections that deal with the process (Sections 38, Article 02; Section 38, Article 04; Section 38, Article 06; Section 38, Article 08; Section 38, Article 10 and Section 38, Article 12 - with some revisions)** and allow the handful of cannabis cultivators ready to begin operations the opportunity to cultivate this year. Then, working with stakeholders who understand the cannabis industry and the public concerned with cannabis cultivation, review and more completely build out, or eliminate the remaining articles.

From: [Don Duncan](#)
To: [Cannabis](#)
Subject: Support the cannabis amendments
Date: Wednesday, March 17, 2021 11:57:42 AM
Attachments: [Sonoma BOS re amendments 2021 03 17.pdf](#)

EXTERNAL

Dear Commissioners,

I have attached a letter addressed to the Board of Supervisors supporting the proposed amendments to the cannabis ordinance and suggesting a change for existing applicants. Please include this letter in the public comments for tomorrow's hearing.

Thank you.

--

Don Duncan, Director of Government Affairs
Patients Care Collective
California Cannabis Distribution Company
Foxworthy Farms
(323) -326-6347

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March 17, 2021

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

VIA Email

RE: Support for cannabis amendments and suggested change for applicants

Dear Supervisors:

I am writing today to support the changes to the cannabis ordinance proposed by staff (ORD20-0005) and to suggest an essential addition to the proposal that is consistent with its intent. Streamlining the permit process for cannabis cultivation will remove barriers for smaller-scale cultivators and save time and money for the county. The proposed changes will also bring the cannabis permitting process in line with other agricultural uses and state regulations. I suggest that, in addition to the common-sense provisions of the staff proposal, you create a path for Conditional Use Permit (CUP) applicants that have not had the final disposition of their application to reapply under the new provisions.

Foxworthy Red, LLC, known as Foxworthy Farms, is an outdoor cannabis cultivation business authorized under the penalty relief program. The owners bought the 82-acre parcel in the Rural Resource Development (RRD) zone in 2016 to cultivate medical cannabis for the nation's oldest continuously operating medical cannabis dispensary. The farm now grows cannabis for adult and medical retailers in the Sonoma County and other Bay Area communities. Two of the three owners lived on the property at 7955 St. Helena Road until the Glass Fire destroyed one residence. The displaced owner will rebuild and live on the farm again as soon as it is possible.

The Board of Zoning Adjustments (BZA) denied our CUP application on December 12, 2019. We filed an appeal based, in part, on the lack of timely notice and incomplete information provided to the BZA by staff at Permit Sonoma. In response to staff feedback before the hearing, we prepared new water management plans, access improvements, and more. Although we submitted those documents to staff days in advance of the hearing, staff did not give them to members of the BZA until after our hearing was underway.

The Board of Supervisors (BOS) has not yet scheduled our appeal hearing. I propose that Foxworthy Farms and other applicants in the designated zones without a final disposition on their CUP applications be allowed to apply for a permit from the Agricultural Commissioner if the proposed changes are adopted. To accomplish this, we would like the BOS to pause all pending applications and appeals for cannabis cultivators. If the BOS approves the changes, applicants

7955 St. Helena Road, Santa Rosa, CA 95404



qualified to do so may then apply for an Agricultural Commissioner permit instead of a CUP using the improved process.

It is reasonable and fair to allow current applicants to use the streamlined process. A new applicant in the RRD zone would be allowed to apply for a ministerial permit. It would be inconsistent to have two similar projects following widely divergent paths. Moving the permitting process for Foxworthy Farms and other pending applicants to the Agricultural Commissioner is fair and less expensive for the applicants and the county.

The streamlined process is significant for Foxworthy Farms. We applied for our CUP in 2017 and have diligently pursued approval. We spent a substantial amount of time, effort, and money since 2017 to obtain licenses and comply with local and state regulations. We agreed to refrain from processing on-site and using two greenhouses as part of a stipulated agreement with the County Council in June of 2019. That agreement significantly reduced our earning potential and dramatically increased processing costs. Our pending appeal and any subsequent legal fees will drive up the price further. These costs were already a burden for a small, locally owned business like ours. However, we are also struggling with devastating damage from the Glass Fire resulting in estimated losses of up to \$3 million.

Despite the hardships, we remain committed to our mission of providing quality medical and adult-use cannabis. We are determined to be a part of Sonoma County's burgeoning cannabis marketplace, where we will provide good local jobs, generate tax revenue, and practice sincere stewardship of our land and watershed. Adding a path to an Agricultural Commissioner permit for Foxworthy Farms is critical in making this happen. I urge you to temporarily pause our appeal process and clarify that we will have an opportunity to take advantage of the proposed improvements to the ordinance.

I am eager to discuss this proposal with you at your convenience. You may reach me at don@PatientsCareCollective.com or (323) 326-6347.

Thank you,

A handwritten signature in black ink, appearing to read "Don Duncan", is written over a light blue rectangular background.

Don Duncan
Director of Government Affairs

cc. Sonoma County Planning Commission

From: [Thereal](#)
To: [Cannabis](#)
Subject: I object to the proposed changes to the Cannabis Ordinance
Date: Wednesday, March 17, 2021 12:15:48 PM

My name is Giel Witt and I have lived in Sonoma County for 60 years. I oppose the proposed changes to the cannabis ordinance. Two years ago the property next to me leased a plot to cannabis growers from out-of-state. So now, instead of looking out at grazing cows and wildlife, we get to see cannabis infrastructure, porta-potties, and cars driving around the field at all hours, shining their headlights & spotlights in our bedroom windows at night.

Trespassers have come onto our property several times in the middle of the night, looking for a way to get into the grow, trying to avoid the nighttime guards. When we hear them, and turn on outside lights, they drive away at high rates of speed with their headlights off. We are downwind of the growing area and are subjected to our house being filled with noxious cannabis fumes for months upon end. We had a very bucolic neighborhood until cannabis came in. I truly believe that anyone who votes to expand cannabis grows should commit to living next-door to one and see for themselves how disruptive it is to every day life.

Cannabis growing is unlike any other agricultural crop. There is so much money in it that no other crops can compete, and it brings a level of crime to neighborhoods that no other agricultural endeavor does. In our neighborhood, the cannabis could expand TENFOLD under the new ordinance. Please do not allow this in our county.

Thank you,
Giel Witt

From: [Ken Adelson](#)
To: [Cannabis](#)
Cc: [Susan Gorin](#); [Karen Adelson](#)
Subject: Commercial Cannabis Cultivation in Rural Residential Areas
Date: Wednesday, March 17, 2021 9:40:55 AM

EXTERNAL

We write in opposition to the proposed ordinance governing cannabis cultivation in Sonoma County. We have lived on Santa Rosa's Sonoma Mountain Road for 21 years. We are greatly concerned that the benefits of living here will be severely compromised if cannabis cultivation is permitted to permeate residential areas of the county, and in particular, the Bennett Valley Area.

Here are comments and questions we ask the Planning Commission to address:

- 1. How do the commercial cannabis growers plan to stop the odors from their operations from tainting the nearby residential neighborhoods?**
- 2. Ground water is already scarce in many neighborhoods and is getting to be more so. How can commercial cannabis growers be prevented from removing more ground water?**
- 3. How can an additional 65,000 acres of cannabis operations fit into Sonoma County rural residential areas?**
- 4. Why are so many commercial cannabis growers being given priority to operate in rural residential areas of Sonoma County? Does the county realize that residential property values will likely plummet, leading to decreased property taxes?**
- 5. How does the county justify permitting cannabis growing near residential properties and burdening those properties with unpleasant odors, continuous vehicles coming and going, and security systems trying to keep thieves away? What has happened to neighborhood compatibility? What has happened to 100-foot setbacks to assist in protecting residential privacy?**

We strongly urge the Planning Commission to make a full examination of the likely serious negative impacts that commercial cannabis

operations will have on residents living in rural residential Sonoma County areas if the cannabis industry is allowed to operate there.

Ken and Karen Adelson
Sonoma Mountain Road, Santa Rosa

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From: [Karel Sidorjak](#)
To: [Cannabis](#)
Cc: CCOBloomfield@gmail.com
Subject: Phase 2 of the Sonoma County Cannabis Ordinance
Date: Wednesday, March 17, 2021 9:09:58 AM

EXTERNAL

My letter is in response to Part 2 of the Sonoma County Cannabis Ordinance. I live in Bloomfield with my wife Veve. We both love taking care of plants and animals on our farm. We treasure slow pace and silence of this place. We don't have street lights in Bloomfield. For most people bit unusual perhaps, I think now of it as the best think out there, because it gives you the best night sky view full of stars. I am afraid that with cannabis industry moving in all of those qualities that I am sure I am not the only one to enjoy, are under threat... Lights from hoop houses and from high security points could completely destroy the dark night environment, not only for people but mostly for nocturnal animals. Noise from electric fans, dryers and high traffic will most likely spread through neighborhood and pollute one thing, that we, who live outside of the cities, can agree on as a main part of our quality of life.

I am also really concerned about our water reserves in Sonoma County. Considering how limited is our water table here and how much water you need to grow cannabis. The County should not approve cannabis permits next to towns and neighborhoods. I urge the County officials to establish at least 1000F buffer from residential property lines to create transitional areas between neighborhoods and cannabis operations. (take Humboldt and Yolo County as an example, they already have those in place).

I urge you to do complete EiR. I do not agree that you should amend the general plan to include cannabis as an AG crop. Humboldt and Santa Barbara county already grows enough cannabis for entire country. Please slow down and spent time with writing a better ordinance if you do want to include legal cannabis grows on our rural land. We love this part of the world. Please help us protect it.

Karel Sidorjak
Piano Farm, Bloomfield

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From: [Dick and Vi Strain](#)
To: [Cannabis](#)
Subject: Fw: Cannabis Ordinance Part 2
Date: Wednesday, March 17, 2021 11:10:44 AM

EXTERNAL

----- Forwarded Message -----

From: Linda Gamble <gambol@sonic.net>
To: "vcrstrain@yahoo.com" <vcrstrain@yahoo.com>
Sent: Wednesday, March 17, 2021, 11:00:40 AM PDT
Subject: Cannabis Ordinance Part 2

In response to the Sonoma County Cannabis Ordinance part 2.

The proposed extensive industrial cannabis industry in Sonoma County should take place in commercial zoned areas, not rural residential zoning. Industrial level factory farming is not agriculture even if the industry is a plant tissue. When a production operation is pursued on a 24 hour everyday level with machinery, lights and noise, this is not rural agriculture, which we, the rural residents are already very familiar with.

Heavy industry does not belong 300' from our homes. We should not be subject to noise, light, water, air and traffic pollution on a grand scale with no recourse or environmental oversight.

The minimum buffer zone of 1,000 should be a mandatory starting point for addressing the health and safety concerns of communities and residents of unincorporated Sonoma County. In areas such as our community, the issues of prevailing winds carrying pesticides and fungicides onto our properties and into our homes and the topography which will allow seasonal water runoff carrying the same pesticides, fungicides and fertilizer residues through our properties and into the adjacent estero are something that need to be addressed by Environmental Impact Reports. Undoubtedly many other unincorporated areas face the same issues that would not be adequately covered by the 1,000' buffer.

Our community has narrow roads, not even wide enough for a center line, and most of the community walks daily on them. Several families with young children reside here and our roads are a safe place for mothers with strollers, children learning to ride bicycles and people walking their dogs. This is the rural life of small unincorporated communities and a lifestyle where people can safely raise their children should be protected. Large industry and 'event' traffic have no place in our community.

The residents of our community all rely on wells for water. Industrial level water use could quickly deplete our aquifers.

The proposed high security fencing and surveillance drones do not belong 300' feet from our homes. Honestly, would you want to listen to surveillance drones while trying to sleep at night? It is not unreasonable for us to request that we have a say in maintaining the lifestyles that we have built, invested in, and pay property taxes for in this County. The County should not approve cannabis permits adjacent to our homes, and the public use areas of our small communities.

Many of the residents of the unincorporated communities have lived in Sonoma County all or most of their adult lives and have contributed for decades to this county being a wonderful place to live, now the second and third generations are building their lives here also, which should not include polluting commercial industry or high traffic tourism right next to our homes, public use facilities, walking paths, parks and cemeteries.

Linda Gamble
Bloomfield, Sonoma County

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From: [Lee Hurvitz](#)
To: [Cannabis](#)
Subject: comments on draft ordinance
Date: Wednesday, March 17, 2021 8:07:17 AM
Attachments: [Public comment on draft ordinance.pdf](#)

EXTERNAL

I have prepared a brief letter to address some issues I have identified with the Preliminary Draft Cannabis Ordinance.

Thanks,

--



Lee S. Hurvitz, PG #7573 CHG # 1015
Certified Hydrogeologist
Hurvitz Environmental Services, Inc.
[105 Morris Street, Suite 188](#)
[Sebastopol, CA 95472](#)
Ph. 707-824-1690
Cell. 707-799-9482
www.hurvitzenvironmental.com

"A goal is a dream with a deadline" ~ Napoleon Hill

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March 15, 2021

Sonoma County Board of Supervisors

Subject: Comments Related to Preliminary Draft Sonoma County Commercial Cannabis Cultivation in Agricultural & Resource Areas Ordinance

Dear Sonoma County Board of Supervisors:

My name is Lee Hurvitz, and I am the owner and primary hydrogeologist with Hurvitz Environmental Services Inc, in Sebastopol Ca. Since 2017, I have worked with numerous cultivators in Sonoma County and have assessed groundwater conditions at over 50 properties. In doing so I have worked directly with various regulatory agencies including the California Department of Fish and Wildlife, the State Water Quality Control Board, Forestry and Agriculture Agencies, Permit Sonoma and several other County Agencies.

I have read the Sonoma County Preliminary Draft Ordinance and have the following comments and concerns,

Section 38.12.140, part 4b states that a 500-foot setback from “blue-line” streams is required for groundwater withdraws unless the project is either Net-Zero, located in a Zone 1 or Zone 2 or if the “blue-line” stream is the Russian River or Dry Creek. My concern originates with the term “blue-line” stream because it’s defined as a solid or dashed blue line on a map which can include both perennial or intermittent streams, as well as, streams that are pond fed. The “blue-line” stream classification is also inconsistent with established terminology used in cannabis Ordinances published by the Ca. State Water Board (SWB), the Ca. Dept. of Fish and Wildlife (CDFW), and has the potential to create confusion for cultivators and regulators, as well as, consultants who are performing multi-agency permitting and compliance efforts. Streams are typically classified and regulated by the following: Class I (Perennial), Class II (Intermittent), Class III (Ephemeral) and are clearly defined by the California Code of Regulations, title 14, Chapter 4. Forest Practice Rules, Subchapters 4, 5, and 6 Forest District Rules, Article 6 Water Course and Lake Protection. Further, USGS mapped watercourse information is not always accurate as field conditions may not have been verified for decades. Typically, biologists and hydrologists who perform site reconnaissance’s and historical records reviews are best qualified to classify current stream conditions.

There are a couple scenarios that quickly come to mind where the “Blue line” classification for streams could be misapplied on projects that create minimal impact on streams or at least varying

degrees of impact. For instance, if an intermittent stream at a site were to go dry every year by June and flow only 3-6 months a year it could still be mapped as a dashed blue-line stream. However, the potential impacts on stream flow and riparian habitats from cannabis irrigation well water withdraws during the summer would not be the same as they would be from well water withdraws near perennial streams that are typically reduced to critical flow conditions late in the summer. However, they would be treated the same way under this new Ordinance. A second scenario could involve an onstream pond that overflows and then continues downstream. The entire stream may be mapped as a dashed “blue-line”. However, the downstream flow may stop completely after April or when the pond water starts being used for irrigation onsite. In this scenario the downstream flow may suspended at same time that well water withdraw begins, thus creating no significant impact on stream flow conditions. However, under the Preliminary Draft Ordinance the 500-foot well setback from the entire stream would be required even though the upper and lower reaches have different flow regimes.

I recommend that the Preliminary Draft Ordinance be revised to include the same stream classifications as most other permitting agencies (Class I, II, III and/or Perennial, Intermittent, Ephemeral) and that the determination on stream classification be done by a professional Hydrologist, Biologist or equivalent and not just by what is shown on a USGS Map. I also recommend that the well water withdraw setbacks for the various stream classifications be established separately. A proposed setback from the different stream classifications is shown below.

Class I Stream (Perennial) – 500 ft.

Class II Stream (intermittent) – 250 Feet

Class III Stream (Ephemeral) – 25 feet

Sincerely,
HURVITZ ENVIRONMENTAL SEVRICES

Lee S. Hurvitz, CHG # 1015
Certified Hydrogeologist

From: [district5](#)
To: [Cannabis](#)
Cc: [Leo Chyi](#)
Subject: FW: Draft Cannabis ordinance
Date: Wednesday, March 17, 2021 11:00:28 AM

-----Original Message-----

From: Leanne Nakashima <leannenakashima@lrmtteam.org>
Sent: Tuesday, March 16, 2021 12:02 PM
To: Lynda Hopkins <Lynda.Hopkins@sonoma-county.org>
Subject: Draft Cannabis ordinance

EXTERNAL

I am a voting, 30-year Sonoma County resident and I am a proud member of our Sonoma County Cannabis industry. I voted for the legalization of cannabis in California, and I was privileged to help operate and own the longest permitted cannabis dispensary in Sonoma County, Sonoma Patient Group. I took part in helping develop the Teamsters and SRJC Hemp and Cannabis Apprenticeship program in 2019 as I believed that with the Hemp and Cannabis Industry growing larger today than our Airlines industry, cannabis laborers deserve education and training like any other industry. It's my belief that by establishing an ordinance that supports our cannabis industry's growth, Sonoma County will prosper and grow into a leading cannabis region in California.

I personally have been waiting for years for the release of this draft ordinance. I am very proud to see Cannabis cultivation permitting move to the agriculture department as I feel Andrew Smith and his staff understand that Cannabis is an agricultural commodity and should be treated like any other agriculture.

There are several concerns about the draft ordinance that I wanted to address.

Please draft language in the ordinance that will provide a clear pipeline and pathway for the Sonoma County Legacy Cultivators. These cultivators are the people who built our Sonoma County medical cannabis industry and are the farmers still fighting today become fully licensed. These farmers are the heart of our industry and deserve a chance. With the push at a state level to create appellations and develop regional cannabis, our legacy farmers deserve to be a part of this incredible process. These are the farms that have been producing our regional cannabis products for years. Our Sonoma County Agriculture Department has already created a Hemp ordinance that treats it like any other agriculture in our county, so why can't cannabis be treated the same way in our county?

Below are specific changes to the draft ordinance that I would like to discuss.

Generally, references for indoor and greenhouse cultivation should be omitted or specifically referred to Chapter 26. Several sections include discussion of indoor and greenhouse cultivation, which is not applicable to the proposed chapter. This is noted in Sections 38.12.030, 38.12.040, 38.12.060 and other sections.

Section 38.12.040 – Setbacks.

Comment: Chapter 26 Section 26-88-254(f)(6) includes language:

“This park setback may be reduced with a use permit when it is determined that an actual physical equivalent separation exists due to topography, vegetation or slope, that no offsite impacts will occur, and that the cannabis operation is not accessible or visible from the park.”

While proposed Chapter 38, Section 38.12.040 does not include this language. It seems proposed Chapter 26 should at least point to Chapter 38, so the applicant can choose the ministerial permit pathway.

Comment: Section 38.12.040.A.3. appears to conflict with Section 38.12.010.D.3. While Section 38.12.040.A.3. states “outdoor or hoop

house cultivation, the cultivation area must be set back a minimum of 1,000 from the property line of a parcel.... with a public park of Class I Bikeway...”, but Section 38.12.010.D.3. states “no outdoor canopy can be visible from a public right of way”. Which is it? Is it both? If both, then clarifying language should be placed in both sections.

Section 38.12.050 – Protection of Historic and Cultural Resources

Comment: Section 38.12.050 states:

“A use permit will be required if mitigation is recommended by the cultural resource survey or local tribe.”

There are various levels of mitigation recommended by cultural resource surveys, which can place restrictions on where construction can occur or that a monitor needs to be present. Minor and non-invasive mitigation measures should not trigger a discretionary permit.

Section 38.12.060 – Tree, Timberland, and Farmland Protection

Comment: Section 38.12.060 does not allow for diseased or fire damage trees to be removed. A licensed arborist can be required to determine if the tree(s) is diseased or fire-damaged and allow for removal by a license professional.

Section 38.12.070 – Protection of Biotic Resources

Comment: Section 38.12.070.A.3. states:

“A use permit will be required if the qualified biologist in the biotic resources assessment required by this chapter recommends mitigation measures.”

Biotic resource assessment invariably has recommendations for mitigation measures, but these vary in degree. Recommended mitigation measure can be that construction cannot occur during a specific time with noise levels above a certain level or if trees are to be trimmed, a biologist must first confirm the absence of nesting birds. Non-invasive mitigation measures should not trigger a discretionary permit.

Comment: Section 38.12.070.C. states:

“Cannabis cultivation and related structures and development cannot be located within Biotic Habitat Combining Zone, pursuant to Section 26-66 of Chapter 26 of the Sonoma County Code.”

However, Section 26-66-020 – Standards for biotic habitats states:

“A biotic resource assessment to develop mitigation measures may be required where the Director determines that a discretionary project could adversely impact a designated habitat area.”

In keeping with the requirements of Chapter 26, Section 26-66-020, cultivation proposed with a Biotic Habitat Combining Zone should simply trigger a discretionary permit application.

Section 38.12.080 – Fire Protection and Hazardous Materials

Comment: Section 38.12.080.A. states:

“The fire prevention plan must state how the development will comply with chapters 13 and 13A of this code, and”

Perhaps, for clarification and continuity of the language within this proposed chapter, it should state:

“The fire prevention plan must state how the development will comply with chapters 13 and 13A of the Sonoma County Code”

Thank You for your time and dedication towards a Sonoma County Cannabis Ordinance that helps our industry grow and thrive to become a leading region for cannabis in California.

Leanne Nakashima

Labor Resource Management Inc

837 5th St. Santa Rosa, CA 95404

C: 1 707.394.4350 O: 1 707.303.7575

Email: LeanneNakashima@lrteam.org

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From: [Mirandi Dallas Fuge](#)
To: [Cannabis](#); [David Rabbitt](#)
Subject: Cannabis Ordinance of Sonoma County: Citizen Concerns
Date: Wednesday, March 17, 2021 10:50:22 AM

EXTERNAL

Dear Sonoma County Planning Commissioners and Cannabis Staff,

After reading the public comments about the proposed amendments to the Cannabis Ordinance of Sonoma County, I was taken aback by the hostility and lack of trying to understand the other side between the cannabis growers and the residents. I could see this "war" going on for a long time unless the Ordinances are improved or designed differently.

I want to suggest an idea from the letter from a past planner, Ray Krauss. The main idea is to identify the sites that are suitable for commercial cannabis growing based on a set of planning criteria such as: areas free of important wildlife habitat and corridors, areas remote from public and private parks, children's camps, trails, etc, areas easily secured and accessible by law enforcement, areas where roads are adequate, areas free of extreme wildfire danger, etc . Then the sites that are problems will be eliminated before any purchase by a grower. This would streamline the permit process since the land would already be more or less permitted beforehand. It would eliminate residents having to "fight" the cannabis industry to protect their backyards.

Since this is probably not going to happen, the second best thing I read was to have 1000 foot setbacks from all residential properties, parks, school, walking paths, and other public and private places where people live and kids play. This would also eliminate a large part of the problems since many of the public concerns would be mitigated by moving the grows away from where people live, rest, play, raise their children, and heal.

Please take the time now to fix the Ordinance and eliminate the many years of stress, law suits, grower's financial losses and anger by the long time voters, tax payers, and lovers of Sonoma County that are ahead of us.

Thank you for your consideration,

Mirandi Dallas-Fuge
12460 Mill St
Bloomfield, Ca

March 16th, 2021

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From: [Matthew Lucas](#)
To: [Cannabis](#)
Subject: Public Hearing Comment for Planning Commission, BOS c/o McCall Miller
Date: Wednesday, March 17, 2021 11:22:56 AM

EXTERNAL

Dear Members of the Planning Commission,

I am writing to express support of expanding commercial cannabis permits, as well as including cannabis within agriculture. Additionally, I am in strong agreement with the proposal to renew permits every 5 years. Legal cannabis operations should not be treated any differently than other agricultural businesses. There should not be extra hurdles and burdens just because someone is a farmer of one crop and not another. By increasing permits, the economy will benefit from extra tax dollars as well as provide essential employment to locals. It is beneficial for the county to support local farmers and stimulate the economy.

Thank you,
Matthew Lucass
Creek's Edge, Inc

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From: [Riley Grega](#)
To: [Cannabis](#)
Subject: Concerning the vote on expanding Cannabis growth into the agriculture sector
Date: Wednesday, March 17, 2021 9:49:41 AM

EXTERNAL

To whom this may concern,

This message concerns the vote tomorrow to expand cannabis growing operations into the agriculture sector.

Hello! My name is Riley Grega and I am speaking on behalf of my fiancé Sebastian and I. We are both in our late 20s and have lived in Sebastopol ongoing for last 6-10 years. We grow organic food for ourselves and family and have adopted permaculture and ecologically sound practices into the way we interact and use our land for the protection of our air, watersheds and ecological biodiversity in our county.

In our opinion, the expansion of Cannabis into to the agriculture sector would be quite disruptive ecologically and bring potential dangerous and unwanted activity to our neighborhoods.

Vineyards and wine growing operations already are enough of a ecologically disaster for our watershed and biodiversity in this county.

Please prioritize the health of our waters, the air (spare the air not for just for fire, but pesticide particulates) and health of our community over profits. We need less pesticides, herbicides and mono crops. We need more diversity, protected areas that are being restored and managed properly.

Please consider our thoughts in these decisions and consider making Sonoma more beautiful and healthy opposed to more wealthy. Health is wealth.

Thank you for your time,

Warmly,

Riley Grega & Sebastian Martinez
5813 Mcfarlane Rd, Sebastopol CA 95472
360.621.4367

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From: [Jaime Neary](#)
To: [Cannabis; district3; district4](#)
Cc: [Don McEnhill](#)
Subject: Russian Riverkeeper Comments on Proposed Sonoma County Cannabis Land Use Ordinance Update and General Plan Amendment
Date: Wednesday, March 17, 2021 11:32:58 AM
Attachments: [RRK_Comments_on_SoCOs_Proposed_Cannabis_Ordinance.pdf](#)
[image001.png](#)

EXTERNAL

Good morning,

Attached are Russian Riverkeeper's comments in regards to the proposed Sonoma County Cannabis Land Use Ordinance Update and General Plan Amendment.

Best,
Jaime

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Jaime Neary
Staff Attorney
Russian Riverkeeper
PO Box 1335
Healdsburg, CA 95448
707-723-7781

It's your River—we protect it!





March 17, 2021

Planning Commission
c/o McCall Miller
Department Analyst, Cannabis Program
Sonoma County Administrator's Office
575 Administration Drive, Suite 104A
Santa Rosa, California 95403

Sent via email: cannabis@sonoma-county.org; district3@sonoma-county.org; district4@sonoma-county.org

RE: Sonoma County's Proposed Cannabis Land Use Ordinance Update

Dear Mr. Miller:

On behalf of Russian Riverkeeper (RRK), I welcome the opportunity to submit these comments for the "Sonoma County Cannabis Land Use Ordinance Update and General Plan Amendment." Russian Riverkeeper is a local nonprofit that has been successfully protecting the Russian River watershed since 1993. Through public education, scientific research and expert advocacy, RRK has actively pursued conservation and protection for the River's mainstem, tributaries, and watershed. Our mission is to inspire the community to protect their River home, and to provide them with the tools and guiding framework necessary to do so. For that reason, we submit the following comments.

Sonoma County is home to numerous species that are protected by the Endangered Species Act. This includes aquatic species like the Central California Coast Coho Salmon, Steelhead, and Chinook Salmon, which are still seeing observed population decline in this region. While partly due to climate change impacts like drought and reduced habitat quality, these negative impacts are being further exasperated by flawed human action. Continued reductions to stream flow without conservation measures is degrading riparian habitat and forcing individuals to increasingly turn to groundwater. It is the culmination of these factors that is resulting in disconnected waterways and causing our watershed to run dry, which in turn, perpetuates harm to our protected species.

Studies by Sonoma Water, the Regional Water Board, California SeaGrant, and others have found evidence supporting the fact that our surface waters and underlying groundwater are hydraulically linked throughout much of Sonoma County. During summer months when flow is already particularly low, it is vital that groundwater flows are not further impaired and supplementation of surface flows is not interrupted. This is particularly important for Coho and Steelhead habitat in the five key rearing streams already facing significant water depletion: Mark West Creek, Mill Creek, Atascadero Green Valley, Austin Creek, and Dutch Bill Creek. Any use permits in these and other impacted tributaries must not exceed a net-zero water determination in order to provide stream protection for these protected species. Implementation of additional mitigation measures as part of required CEQA analysis should also consider ways to make any new cultivation areas net-zero in regards to cumulative water impacts for that specific tributary.



We also know that current state regulations will cause groundwater to be the primary water source for any cannabis cultivation within Sonoma County as there are far fewer restrictions on groundwater use.¹ This lack of regulation for groundwater wells is certainly true in Sonoma County as there is currently no impact analysis done before granting such well permits. Further, streamflow depletion can occur within any human-designated groundwater zone because these zones are just that, imaginary lines drawn by humans to accommodate certain information deficiencies. Instead, streamflow depletion is more largely influenced by site-specific factors like: well location and distance from surface waterway, pumping intensity, seasonal factors like precipitation, and local geologic make-up. There is cause for great concern regarding the linked impacts between surface and groundwater diversions that go un-mitigated. Thus, the potential for unrestricted groundwater use is unacceptable without further consideration for those linkages and impacts.

In addition to these potential ESA violations, there are also serious concerns over whether our Public Trust Resources are being considered and protected in Sonoma County under this proposal. By failing to consider resulting impacts to surface waters, the County is unabashedly allowing public trust harms to occur. In an already depleted water system, further withdrawals will only cause our River to become disconnected at a faster and more frequent rate. This eliminates the ability to use the River to, “fish, hunt, bathe, swim, to use for boating and general recreation purposes...for anchoring, standing, or other purposes.” (*Marks v. Whitney*, 491 P.2d 374, 380 (Cal. 1971)). “There is [also] a growing public recognition that one of the most important public uses...is the preservation of those lands in their natural state, so that they may serve as ecological units for scientific study, as open space, and as environments which provide food and habitat for birds and marine life, and which favorably affect the scenery and climate of the area.” *Id.* There have been no attempts to protect these public trust resources despite Sonoma County having an “affirmative duty...to protect [these] public trust uses whenever feasible.” (*National Audubon Society v. Superior Court*, (1983) 33 Cal.3d 419, 446-47.) Feasible action is available now to protect our public trust uses.

Further, if Sonoma County’s General Plan and Right to Farm laws are updated now to include cannabis, any hopes we have of improving our water quality issues in the next twenty years will become even more obsolete. Agriculture is the number one cause of water quality degradation in this nation and expanding protections for new types of agriculture is not the answer. As noted above, additional groundwater pumping is likely to interrupt the region’s historical hydrology causing stream flow depletions. This means that as more water is removed from the system, there will be a corresponding increase in the overall concentration of contaminants in our waters making their effects more harmful to biota and humans alike. This results in even further degraded habitat for protected species and negatively impacts our public trust resources—both of which require more protection than Sonoma County is currently giving to them.

To properly account for these harms, the County and/or the permittee must be able to show a net zero water plan or conduct a hydrogeologic analysis confirming streamflow depletion impacts are unlikely for that parcel before any permit is issued or renewed. All other areas must also have

¹ Water Use in Cannabis Farming, Berkeley Cannabis Research Center, <https://crc.berkeley.edu/current-projects/environment/water-use/> (last visited March 14, 2021) (noting that long-term well use may contribute to stream flow depletion and that most cultivators are turning to groundwater sources).



a demonstrable water conservation plan in place to protect limited surface water supplies, similar to what is required by San Mateo County.² Below are recommendations on where these changes should be made within the Sonoma County Ordinance.

“Biotic Resources” Development Criteria, Sec. 26-88-254 (f)(11):

Proposed Language Changes – Proposed cultivation operations, including all associated structures, shall require a biotic resource assessment at the time of application that demonstrates that the project is not located within **sensitive or special status species habitat**, ~~and~~ will not impact sensitive or special status species habitat, **and will not contribute to the dewatering of sensitive or special status species habitat**, unless a use permit is obtained. Any proposed cultivation operation, including all associated structures, located within adopted federal critical habitat areas must have either all appropriate permits from the applicable state and federal agencies with jurisdiction over the listed species, or a biotic assessment concluding that the project will not result in "take" of a protected wildlife species within the meaning of either the federal or California Endangered Species Acts.

“Water Source” Operating Standards, Sec. 26-88-254 (g)(10):³

Proposed Language Changes – An on-site water supply source adequate to meet all on site uses, **as determined after all water conservation measures have been implemented, on a sustainable basis** shall be provided **on a sustainable basis**. Water use includes, but may not be limited to, irrigation water, and a permanent potable water supply for all employees. Trucked water may only be used in response to and **during for the duration of** a local, state, or federally declared emergency or disaster, which causes all other water supplies to be unavailable or inadequate ~~for to meet needs of existing cultivation plots~~ permitted **for** cannabis use. The onsite water supply shall be considered adequate with documentation of any one (1) or a combination of the following sources:

- a. Retail Water. Documentation from a retail water supplier demonstrating and concluding that adequate supplies are available to serve the proposed commercial cannabis use, **provided water conservation measures are in place**.
- b. Recycled Water. Documentation from a recycled water supplier demonstrating and concluding that adequate recycled water supplies are available to serve the non-potable needs of the proposed commercial cannabis use, **provided water conservation measures are in place**. Recycled water may not be used to meet potable water needs.

² Unincorporated Area of San Mateo County, Sec. 5.148.160(s) (noting that licensees must provide conservation measures to the County and allow County access to monitor that water usage).

³ The same proposed language changes, here, would then also be reflected with corresponding changes in Sonoma County Ordinance, Water Use, Sec. 38-12-140.



c. Surface Water. Documentation of adequate water supply from a legal water right, registration, stored rainwater or other surface water source that is exempt from State regulation, and, if applicable, a Streambed Alteration Agreement issued by the California Department of Fish and Wildlife, **provided water conservation measures are in place.**

d. Groundwater well, subject to all standards and requirements listed below:

1. Documentation of a net zero water plan prepared by a qualified professional demonstrating and concluding that the proposed use would not result in a net increase in onsite groundwater use; or documentation of one of the following:

a) If the groundwater well is within a Priority Groundwater Basin, then provide a hydrogeologic report prepared by a qualified professional demonstrating and concluding that the commercial cannabis use will not result in or exacerbate any of the following conditions of a basin or aquifer, consistent with the California Sustainable Groundwater Management Act (SGMA):

- i. Chronic lowering of groundwater levels;
- ii. Reduction of groundwater storage;
- iii. Seawater intrusion;
- iv. Degraded water quality;
- v. Land subsidence;
- vi. Depletions of interconnected surface water.

b) If the groundwater well is not located in a Priority Ground Water Basin, then demonstrate compliance with subdivisions 2. through 4., below, of subsection (10)d.

2. If the groundwater well is within 500 feet of a blue-line stream, then documentation of one of the following:

a) A net zero water plan prepared by a qualified professional demonstrating and concluding that the proposed use would not result in a net increase in onsite groundwater use; **or**

b) The groundwater well is within 500 feet of the Russian River, ~~or~~ Dry Creek, **or other tributary known to provide sensitive or special status species habitat. or**

~~c) The groundwater well is within Groundwater Availability Zone 1 or 2.~~



3) ~~For all If the~~ groundwater wells, ~~is within Groundwater Availability Zone 3 or 4, then~~ documentation of a dry season well yield test demonstrating minimum yield to support the combined groundwater use of existing and proposed uses in accordance with all of the following:

- a) Minimum yield to support residential water use must be established in accordance with Sec. 7-12 of this code;
- b) Minimum yield to support all other uses must equal five (5) gallons per minute per one (1) acre foot of annual groundwater demand demonstrated through a 12 hour test;
- c) The test must be conducted from July 15 to October 1, or during an extended test period established by the agricultural commissioner due to delay of rainy season.
- d) The test must be performed by or under the direction of a licensed water well drilling contractor (C57), pumping contractor (C61/D21), a registered civil engineer, or a registered geologist.

4. Protection Against Well Interference. ~~For all If the~~ groundwater wells, ~~is within Groundwater Availability Zone 3 or 4, then~~ documentation of an assessment of drawdown for all non-project wells within 500 feet of the well demonstrating maximum drawdown of 10 feet over a 24 hour simulation period, using industry standard method(s) appropriate to the project aquifer. The assessment must be performed by or under the direction of a licensed water well drilling contractor (C57), pumping contractor (C61/D21), a registered civil engineer, or a registered geologist.

As currently drafted, it is unlikely Sonoma County's current proposals will adequately mitigate the potential for streamflow depletion, which conversely also makes the Mitigated Negative Declaration insufficient. We appreciate your consideration of our comments and welcome any questions you might have.

Sincerely,

Handwritten signature of Jaime Neary in black ink.

Jaime Neary
Staff Attorney
Russian Riverkeeper
707-723-7781

Handwritten signature of Don McEnhill in black ink.

Don McEnhill
Executive Director
Russian Riverkeeper
707-433-1958

From: [sica](#)
To: [Cannabis](#)
Cc: [district5](#)
Subject: Public comment -cannabis ordinance - well setbacks
Date: Wednesday, March 17, 2021 7:28:04 AM

EXTERNAL

Hello,

I am submitting this public comment for the cannabis ordinance changes being discussed now.

I am requesting that the well setbacks to streams remain unchanged . Changing the well setbacks from 30 ft. from top of bank to 500 ft from top of bank is the most dramatic and terrible change being suggested.

There is already a forbarence period required by the State Water Board ,for certain water zones, for low water times of year. The Water Board has long experience with this subject. Lets let THEM make the well setback requirements.

I believe the county is making a mistake by trying to add more restrictions to water use , instead of being guided by State Water board existing rules.

Cannabis does NOT use more water than grapes if grown responsibly. Possibly even less water than grapes , depending on cultivation techniques.

This MAJOR change in well setback requirements is completely out of line with requirements for any other agricultural crop, for what reason ? This change to well setbacks from blue line streams does not make sense.

The Sonoma cannabis industry has suffered for 4 + years from overly restrictive rules and a slow moving permit process. We cannot keep impeding the industry by OVER REGULATING !

The antiquated prohibition mentality has to end ! Treat cannabis like other Ag crops ! Cannabis is a plant , like other Ag crops !

Thank You,

Sica Roman

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From: [Sonia Taylor](#)
To: [Larry Reed](#); [Todd Tamura](#); [Gina Belforte](#); [Greg Carr](#); [Caitlin Cornwall](#); [Pamela Davis](#); [John Lowry](#); [Cameron Mauritson](#); [Jacquelyne Ocana](#); [Cannabis](#); [PlanningAgency](#)
Cc: [Tennis Wick](#); [Scott Orr](#); [Lynda Hopkins](#); [Chris Coursey](#); [district4](#); [Susan Gorin](#); [David Rabbitt](#); [Robert Pittman](#); [Andrew Graham](#); [Johnson, Julie](#); [Jim Sweeney](#); [Suzanne Doyle](#); [Steve Birdlebough](#); [Michael Allen](#); [Janis Watkins](#); [Teri Shore](#); [Padi Selwyn](#); [Judith Olney](#); [SCTLC list](#); [Will Carruthers](#)
Subject: Re: Draft Cannabis Package, PC Hearing March 18, 2021
Date: Wednesday, March 17, 2021 11:07:41 AM
Attachments: [3_17_21_cannabis_ltr_misc_final_1.pdf](#)

EXTERNAL

Gentlepersons:

Attached to this email is my letter covering additional points that I don't believe have been covered in other communications.

As always, I am happy to discuss this request with any of you -- please do not hesitate to contact me.

Thank you for your consideration.

Sonia

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17 March 2021

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Via email

Re: Draft Cannabis Ordinance and Draft Subsequent Mitigated Negative Declaration
Planning Commission Hearing Scheduled for March 18, 2021

Gentlepersons:

This letter will cover a number of issues about the current cannabis package that you will be considering on March 18, 2021. There has already been substantial comment about this cannabis package, and I will attempt to offer new discussion in this letter. Said package includes the proposed Draft Cannabis Ordinance – Chapter 38, Amendments to Chapter 26, Draft Subsequent Mitigated Negative Declaration (hereinafter MND), and proposed General Plan Amendments (collectively referred to as the “cannabis package”).

General Comments

If the County’s goal was to do robust community outreach, draft, legally evaluate under the California Environmental Quality Act (hereinafter CEQA) and then promulgate a clear and unambiguous cannabis ordinance that has a chance of being successful for cultivation on LIA, LEA, DA and RRD county lands, I believe that effort has been an epic failure.

To date I have not been impressed by either the County’s efforts or their understanding of the process of developing or legally evaluating a proposed ordinance, particularly on a subject that is as difficult as cannabis cultivation.

As just three examples of The County's apparent lack of understanding:

1. The Agricultural Commissioner made comments during at least two of the public meetings held during the week of March 8, 2021 that indicate his lack of understanding, first misstating the proposed ordinance's requirement for control of odor, and then asking participants in one of those meetings to tell him/the County what other Counties are doing regarding cannabis.

I believe a minimum requirement for the single person proposed to be responsible for issuing ministerial permits and enforcing whatever ordinance will ultimately be approved would be for that person to actually understand what that currently proposed Chapter 38 requires.

And, if I were going to draft an ordinance about a subject as difficult as this, the very first thing I would have done would have been to consult with every other California jurisdiction to see what is working, and what is not. For the Agricultural Commissioner to ask "us" what other Counties are doing **after** having put forward a draft ordinance, and only nine days before the first public hearing on said draft ordinance, evidences no commitment on his part to actually putting forward an ordinance that will be successful.

2. The CAO's office published a Public Notice on Monday, March 8, 2021, announcing the March 18, 2021 Planning Commission meeting on this draft ordinance, and said Public Notice stated: "Meeting materials are available on the Cannabis Program website." This statement was incorrect, and this was the only Public Notice published for this meeting. Public Notices are legal documents, and promising something that was not delivered is unacceptable.¹

3. Although "preliminary" draft documents were made available early for public review, which was a good idea, the County did not feel it necessary to conduct any public outreach about the new proposed ordinance until the week before the first public hearing on the new draft ordinance. And then the County conducted 4 "listening sessions" within the week of March 8, 2021, which had hundreds of unique attendees and generated thousands of questions and comments.

Most disturbingly, no substantive questions were answered at those meetings. The promise was made that the most frequently asked questions would be answered, and would be posted on the County's cannabis website. Unfortunately, that has not happened. The FAQ on the County's cannabis website did go from 4 answered questions to 11 answered questions, but that in no way reflects the hundreds of questions asked and unanswered during the 4 "meetings."

I see that all of the unanswered questions are posted on the County's cannabis website and are being provided to the Planning Commission, but, again, where are the answers?

¹ Permit Sonoma published the Agenda and Staff Report for this item on Thursday, March 11th, 7 days prior to the March 18th meeting, which was much appreciated. All other meeting materials were made available that same day, as well.

I believe that there is an ordinance that could be successful, including one that permitted ministerial approvals for cannabis cultivation under some circumstances, as well as providing protections for both neighbors and our environment. This ordinance is not that.

Following are my specific additional comments about this cannabis package.

1. This Cannabis Package is in Violation of the California Environmental Quality Act

You cannot adopt the MND, or approve any part of this cannabis package, because the County has not complied with CEQA. As already covered in my March 1, 2021 letter, this entire cannabis package violates CEQA because (among many other reasons) the Amendments to Chapter 26 amended a chapter that was repealed on February 9, 2021, and the current Chapter 26 went into effect on March 11, 2021.

Unless and until the current Chapter 26 is properly and correctly amended, there is no way any referral agency, stakeholder or member of the public can evaluate the cannabis package rendering the MND fatally defective.

2. “Best Management Practices” Do Not Exist

Section 38.02.070 of proposed Chapter 38 states that it is the Board of Supervisors’ intent that Best Management Practices be adopted by the Agricultural Commissioner. Although Section 38.02.060 attempts to make those Best Management Practices “voluntary” (by stating that same “may” be “adopted”), Section 38.02.070 makes clear, repeatedly, that they will indeed be adopted, and then will each project will be evaluated – in a ministerial fashion – using those adopted Best Management Practices.

To the best of my knowledge the Agricultural Commissioner has not adopted any Best Management Practices, and certainly no Best Management Practices are part of proposed Chapter 38, or part of this cannabis package.

Although the MND herein proposed some alleged “best management practices” as attempted mitigations for significant impacts, since proposed Chapter 38 states explicitly that there will be Best Management Practices adopted by the Agricultural Commissioner, the lack of those adopted practices, and evaluation thereof, renders the MND defective.

Of course, having the Best Management Practices as part of proposed Chapter 38 would not only comply with the plain language of the proposed ordinance, but would be useful and helpful to all stakeholders.

3. Resources and Rural Development Lands and the Right to Farm Ordinance

There is a reasonable question—which was neither considered nor evaluated by the MND – as to whether expansion of “agricultural crop production” to include cannabis activities is compatible with Resources and Rural Development designated and zoned lands (hereinafter RRD) – RRD lands are the largest number of acres opened to cannabis operations by proposed Chapter 38.

The MND herein implies throughout that all cannabis operations that would be allowed by proposed Chapter 38 would be subject to Sonoma County's Right to Farm ordinance.²

This is incorrect. RRD lands are not agricultural lands, and are not covered by the Right to Farm ordinance, whether or not the County is successful at redefining cannabis as an "agricultural crop."

In the General Plan's Land Use Element, RRD designated lands are discussed and defined.³ The purpose and definition of RRD designated lands does include "accommodation" of agricultural production activities, but that is far from the primary purpose. The permitted uses include "crop production," but again, that is far from the primary permitted use.

Instead of any type of agricultural use, the very first clearly permitted use mentioned for RRD lands is "single family dwellings." Historically, residences have been a primary permitted use on RRD lands, and numerous Sonoma County residents live on RRD lands, as they have reasonably relied on the County General Plan and the Zoning Code. The inclusion of RRD lands in this cannabis package will only serve to exacerbate conflicts between cannabis cultivation and residents (particularly since the Right to Farm ordinance does not apply to RRD lands), and this fact was neither addressed nor evaluated in the MND.

The purpose of the Natural Resource Land Use Policy contained in the General Plan Land Use Element is:

[T]o protect lands used for timber, geothermal and mineral resource production and for natural resource conservation.

The significant attempted expansion of "agricultural crop production" into RRD lands flies in the face of this purpose, and must be adequately addressed and evaluated in the MND, which it is not.

In addition, as is made clear in the General Plan, RRD lands have been so designated because they have severe physical constraints (such as steep slopes, high/very high fire danger, marginal or unproven water availability, etc.), or are lands with natural resources to be protected (such as water, timber, habitat, etc.) and are lands that are vulnerable to environmental impact.

The MND herein is defective on its face for failing to correctly and honestly evaluate the impacts of this proposed expansion of cannabis operations into RRD lands.

² The MND also erroneously states that the Right to Farm ordinance "does not permit any neighboring property located on or adjacent to agricultural land to oppose any inconvenience or nuisance caused by any type of properly conducted agricultural activity on agricultural land," which is not exactly factual.

³ Including nine Planning Areas with their own unique policies; none of those areas/policies have been considered or evaluated by the MND herein.

4. Ministerial Permits for Cannabis Operations on RRD lands are Not Permitted

Proposed Chapter 38 proposes ministerial permits, unless required otherwise by Chapter 26 of the Zoning Code.⁴

On RRD lands, for every permit issued, a determination must be made that cultivation will not interfere with the primary purpose of RRD lands, which is “to protect lands used for timber, geothermal and mineral resource production and for natural resource conservation.”

Making this determination will require the use of discretion, and therefore I believe it will be impossible for any ministerial permits to be issued for any cannabis activities on RRD lands.

Discussion

The MND manages to cherry pick specific portions of the Open Space and Resource Conservation Element of the General Plan to evaluate⁵, but ignores the underlying question of whether allowing cannabis cultivation and other cannabis related activities is even appropriate on these RRD lands.

The current Zoning Code, Section 26-6-020 4, defines RRD lands, and that definition is generally same as that contained in the General Plan. “Agricultural Production Activities” is defined in the General Plan Glossary (a similar definition is in the current Zoning Code for “Agricultural Production”) as:

Those activities directly associated with agriculture, but not including agricultural support services, processing, and visitor serving uses. Activities include growing, harvesting, crop storage, milking, etc.

Otherwise, agriculture is not mentioned as a permitted use, although visitor serving uses are permitted “where compatible with resource use [not agricultural uses] and available public services.”

Table 6.1 of the Zoning Code states that on RRD lands agricultural crop production and cultivation is a permitted use, as well as agricultural processing with a conditional use permit (herein after CUP), small scale agricultural processing with discretionary permit approval, but agricultural support services are not permitted. Indoor crop cultivation may be permitted, or may require a CUP. However, Section 26-6-030 makes clear that notwithstanding Table 6.1:

“All uses may be subject to additional standards and regulations and may require a Zoning Permit, Design Review, or other additional review.”

And:

“A Zoning Permit, Design Review or other permits may be required in addition to those permits required by Table 6-1.”

⁴ I’m getting as tired of writing it as you are reading it – the cannabis package did not propose amendments to the current Zoning Code, and so is wholly inadequate under CEQA.

⁵ The MND does not consider or evaluate the Land Use Element of the General Plan, which is where RRD lands are defined and discussed.

It seems reasonably clear that the following agricultural activities **may** be permitted on RRD lands:

1. Agricultural production and cultivation **may** be permitted.
2. Agricultural processing with a CUP.
3. Small scale agricultural processing with **at least** discretionary permit approval.
4. Indoor crop cultivation **may** be permitted, and **may** require a CUP.
5. Wholesale nursery uses **may** be permitted.
6. Visitor serving uses under specified conditions with **at least** discretionary permit approval.

Taking each one of those permitted uses separately, examination of the Zoning Code shows the following.⁶

Section 26-18-020 – Agricultural Crop Production and Cultivation allows “growing and harvesting,” the “preparation of soil” for agricultural crops, and “incidental cleaning, storage, packing, and similar preparation of crops grown on site, at the time of harvest or shortly thereafter,” perhaps without any additional permits. Agricultural Support Services, Visitor Serving Uses, processing of agricultural crops and greenhouses or similar structures are not included in this definition.

Section 26-18-050 – Agricultural Support Services does not exclude RRD lands, but Table 6.1 clearly prohibits these services on RRD lands.

Visitor Serving Uses are not defined in the current Zoning Code, but are defined in the Land Use Element of the General Plan. That definition is clear that visitor serving uses cannot adversely affect agricultural or resource uses, result in a detrimental concentration, requires any TOT generated in RRD, LIA, LEA or DA land categories be eligible for appropriation for affordable housing, and is also clear that design review is required for these uses. It is unclear whether the newly defined “Periodic Special Events” qualify as visitor serving uses, although periodic special events require at least a permit subject to discretionary approval criteria on RRD lands.

Section 26-18-030 – Agricultural Processing has no standards for RRD lands, but does require a CUP.

Section 26-18-040 – Agricultural Processing, Small Scale is defined as an operation that meets the performance standards in Section 26-88-210, and requires at least a zoning permit.

Section 26-88-210 – Small-Scale Agricultural Processing Facility defines this use and contains a long list of standards that must be met. This use is explicitly allowed in RRD and at least a zoning permit is required. This section emphasizes ensuring neighborhood compatibility and minimizing environmental impacts. Among the standards that must be met is a required setback of 200’ for outdoor loading and activity areas from the “outdoor activity area of any dwelling unit on an adjacent property.”

Section 26-18-160 – Indoor Crop Cultivation is defined as being in greenhouses or similar structures. It further requires greenhouses and other similar structures larger than 800 square feet in RRD zones to

⁶ Cannabis cultivation is explicitly prohibited in every current Zoning Code designation discussed in this letter. Perhaps, if the County decides to comply with CEQA and make proposed amendments to the current Zoning Code, those prohibitions will ultimately be removed, but that doesn’t change the question of whether the proposed cannabis uses are allowable on RRD lands.

obtain at least a use permit. Finally in LIA, LEA and DA zones, no greenhouses or other similar structures shall exceed 2500 square feet.⁷

Section 26-18-200 – Nursery, Wholesale defines wholesale nurseries. The definition of “Nursery – Cannabis” in the current Zoning Code clearly allows only wholesale distribution for medical cannabis. Wholesale Nurseries are otherwise permitted on RRD lands, perhaps without any additional permitting requirements.

As shown, above, the only cannabis operations on RRD lands proposed Chapter 38 can **perhaps** permit with a ministerial permit, legally, are outdoor cannabis cultivation, a wholesale nursery for distribution of medical cannabis and indoor cultivation in a greenhouse or other similar structure that is less than 800 square feet. All other uses do not qualify for ministerial permits.

It is clear that proposed Chapter 38 attempts to allow ministerial permits for cannabis activities on RRD lands that are not permitted by Sonoma County’s General Plan or current Zoning Code, which means that the MND for this project did not accurately address County regulations, or evaluate the impacts of these activities on RRD lands, and is therefore fatally defective.

Finally, of course, as stated above, since for every permit issued a determination must be made that the outdoor cannabis cultivation and/or indoor cannabis cultivation will not interfere with the primary purpose of RRD lands, which is “to protect lands used for timber, geothermal and mineral resource production and for natural resource conservation,” I believe said determination requires the use of discretion, meaning that no ministerial permits can be issued for cannabis operations on RRD lands.

5. Cannabis Setbacks/Buffers in Proposed Chapter 38

Others have discussed odor from cannabis operations at great length. I will not repeat those discussions, but must make two points.

First, the General Plan Draft Environmental Impact Report (hereinafter DEIR) discusses the problem of odors that could affect nearby land uses. At the conclusion of Section 4.3 AIR QUALITY, the DEIR states that “The PRMD would be responsible for monitoring implementation.” I do not believe proposed Chapter 38 can shift the burden of monitoring implementation of odor mitigation to the Agricultural Commissioner for cannabis operations.

Second, while the MND herein alludes to significant agricultural odors, such as animal manure, requiring setbacks from adjacent properties, it fails to admit or evaluate the fact that uses generating those odors are required to have much larger setbacks than proposed Chapter 38 requires, and are further required to obtain either a zoning permit or a CUP for project approval.

The MND fails to disclose or evaluate other larger setbacks required in the current Zoning Code for agricultural uses adjacent to other uses, including residential uses, which is unacceptable.

⁷ These size limitations are grossly exceeded in proposed Chapter 38, and these requirements were neither considered nor evaluated by the MND. Proposed Chapter 38 must be revised to comply with the current Zoning Code’s requirements.

6. Cannabis Operations Affecting Scenic Resources

Proposed Chapter 38 could cause unexamined and unevaluated visual impacts to Sonoma County's Community Separators, Scenic Landscape Units, Scenic Highways and Corridors and Greenbelts, Greenways and Expanded Greenbelts. Additionally, adoption of this ordinance could in the future open lands protected (with taxpayer dollars) by the Sonoma County Agricultural and Open Space Preservation District (hereinafter OSD) to cannabis operations, which would have potential visual (and other) impacts.⁸

The MND herein only evaluates visual impacts of cannabis operations proposed by Chapter 38 insofar as they would be visible from "public vantage points." The MND further only requires cannabis operations proposed by Chapter 38 to "minimize" the visibility of said cannabis uses, and prohibits cannabis operations from being visible only from trails, Class 1 Bikeways or public access points, and then **only** when the cannabis operations are on a parcel adjacent to a public park. Finally, the MND only considers visual impacts on Scenic corridors, instead of impacts on all of Sonoma County's natural environment.

Visual impacts of cannabis operations proposed by Chapter 38 will affect both public and private views, will affect voter protected Community Separator lands⁹, Scenic Landscape Units, Greenbelts, Greenways and Expanded Greenbelts, in addition to Scenic Corridors, none of which are considered or evaluated by the MND.

For this reason, among many others, this MND is defective.

Conclusion:

I am interested in Sonoma County complying with CEQA, and I am also interested in ensuring that every action Sonoma County's government takes involves complete transparency and robust community engagement. Those were my concerns when I first examined this cannabis package – I am neither a cannabis cultivator, nor a likely neighbor of a current or expanded cannabis cultivation.

After spending hundreds of hours reading and evaluating not just this cannabis package, but many of Sonoma County's rules and regulations, I can only conclude that this attempt at proposing expanded cannabis cultivation regulations is an abject failure on every front.

I believe Sonoma County should have evaluated everything all other jurisdictions have done and are doing in an effort to legalize commercial cannabis cultivation, and apparently has not. I also believe that Sonoma County never should have utilized a many year secret ad hoc committee to attempt to develop commercial cannabis cultivation regulations, because that removed possibilities for both transparency and robust community engagement.

Sonoma County should have prepared an adequate programmatic Environmental Impact Report for commercial cannabis cultivation many years ago, and should do so now.

⁸ While cannabis operations are currently prohibited on lands protected by the OSD and other land trust organizations because cannabis is still illegal at the federal level, should cannabis become federally legal, those lands all would potentially be available for cannabis operations. The MND should have discussed and evaluated this possibility.

⁹ See my letter of March 13, 2021, and Greenbelt Alliance letter of March 15, 2021.

At this point, I do not see this cannabis package as salvageable. It violates CEQA in an multitude of ways, it was prepared largely in secret, and community engagement on this complicated subject has been woeful, at best.

Please direct all County Staff to stop attempting to adopt this cannabis package.

Please direct all County Staff to commence preparation of programmatic Environmental Impact Report on commercial cultivation of cannabis in Sonoma County.

Please demand complete transparency and robust community engagement as part of all efforts moving forward, and request all County Staff to evaluate what is working (and what isn't) in other California jurisdictions before continuing this effort.

Thank you for your consideration of this and all other communications regarding this cannabis package.

I am hopeful that moving forward Sonoma County can adequately comply with CEQA and ultimately develop regulations covering commercial cannabis cultivation that comply with the law, involve robust community engagement, and are clear and unambiguous, so all stakeholders know what will be permitted.

As always, I am happy to talk with any one of you regarding this matter. Please do not hesitate to contact me if you have any questions or require additional information.

Very truly yours,

Sonia E. Taylor

Cc: Tennis Wick, Permit Sonoma Director
Scott Orr , Permit Sonoma Deputy Director
Sonoma County Board of Supervisors
Robert Pittman, Sonoma County Counsel
Andrew Graham, Press Democrat
Julie Johnson, Press Democrat
Jim Sweeney, Press Democrat
Will Carruthers, the Bohemian
Sierra Club
Sonoma County Conservation Action
Greenbelt Alliance
Preserve Rural Sonoma County
Sonoma County Transportation and Land Use Coalition