

Public Comment Regarding Cannabis Ordinance and
Program Update

Received September 2023

From: [Kim Roberts-Gutzman](#)
To: [Cannabis](#)
Subject: As legal pot farms expand, so do air pollution worries | Science | AAAS
Date: Tuesday, September 12, 2023 8:33:28 PM



As legal pot farms expand, so do air pollution worries | Science | AAAS

<https://www.science.org/content/article/legal-pot-farms-expand-so-do-air-pollution-worries>

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From: [Lauren Mendelsohn](#)
To: [Crystal Acker](#); [Cannabis](#)
Subject: Comments for EIR & Draft Ordinance
Date: Wednesday, September 20, 2023 8:09:50 AM

EXTERNAL

Good morning,

Please consider the following when preparing the countywide cannabis EIR and revised cannabis ordinance:

- Remove the cap on the number of retailers (dispensaries). If overconcentration is a concern, then consider requiring a buffer (for example, 600 feet) between dispensaries.
- Allow cannabis activity in the Coastal Zone, which would allow a dispensary to exist in Bodega Bay or elsewhere elsewhere along the coast (there are no dispensaries along the entire Marin or Sonoma coast, despite how many tourists come there and how many patients live there).
- Reduce the code enforcement penalties associated with personal and medical cannabis cultivation when no commercial activity has taken place.
- Clarify the definition of “commercial cannabis activity” to mean cannabis activity that is related to a business or where money has or will change hands in exchange for cannabis (this is CRITICAL as the current language sweeps up personal / medical growers and charges them as commercial operations if they have over 6 plants / 100 square feet, even if the cannabis is all for their personal use).
- Allow all license types offered by the Department of Cannabis Control.
- Allow consumption lounges, with indoor and/or outdoor smoking and vaping permitted depending on the specific site in question.
- Allow cannabis events at venues that wish to host them.
- Allow cannabis cultivators to use portable toilets with the same rules and restrictions as other agricultural operators.
- Allow cannabis drying to take place in temporary and ag-exempt structures.
- Expand the zones where microbusinesses are allowed.

Let me know if you have questions or comments about any of these recommendations. I will send more as I think of them.

Thank you.



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From: [Neighborhood Coalition](#)
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Cc: [Crystal Acker](#); [Tennis Wick](#); [Scott Orr](#); [Christina Rivera](#); cheryl.sarfaty@busjrn1.com; [McCall Miller](#); [Cannabis](#); [Sita Kuteira](#); [Jennifer Klein](#); [Andrew Smith](#); bryce.martin@pressdemocrat.com; john.danna@pressdemocrat.com; [BOS](#); [PlanningAgency](#)
Subject: Educational Aspects of Cannabis - FYI
Date: Tuesday, September 26, 2023 4:08:31 PM

EXTERNAL

Ms. Vecchio, FYI

March 13, 2023

Honorable Christina Rivera
Sonoma County Administrator
600 Administration Drive
Santa Rosa, California 95403
Re: Impact of Cannabis on Health and Safety of Sonoma County Residents

Dear Ms. Rivera:

Congratulations on your appointment as Sonoma County's Administrator. In your new role, the Neighborhood Coalition of Sonoma County respectfully requests you address the urgent issues surrounding the impact of cannabis on the health and welfare of Sonoma County residents.

The County's robust support for the cannabis industry is undeniable. The County's focus, however, appears to be on the economics of the substance and providing financial support to growers and sellers, while ignoring the dark underbelly of cannabis and the risks posed to the public by its production and use.

As you undoubtedly are aware, Proposition 64 created The California Marijuana Tax Fund with designated funding, including annual funding as follows: (1) \$2 Million to the UC San Diego Center for Medical Cannabis Research; (2) \$10 Million to California universities for research as

to the impact and implementation of Proposition 64; (3) \$3 Million to the CHP to develop protocols for assessment of driving under the influence of cannabis; and (4) \$50 Million for grants to local health departments and community-based nonprofits supporting, among other issues, mental health treatment and substance use disorder treatment.

In addition to the earmarked funds, Proposition 64 directs the remaining funds be dedicated as follows: (1) 60% to youth programs, including drug education, prevention, and treatment; (2) 20% to prevent and alleviate environmental damage from illegal marijuana producers; and (3) 20% to programs designed to reduce driving under the influence of marijuana and for a grant program designed to reduce negative impacts on health or safety resulting from the proposition.

The plentiful funding available through Proposition 64 Public Health and Safety Grant Program

requires no local or matching funds. Nevertheless, we are not aware of the County's accessing these funds in any significant way to address rapidly emerging and serious public health risks inextricably entwined with the cannabis industry, an industry the County leaders so wholeheartedly support. These risks clearly were foreseen by the topics identified in Proposition

64's specification of funding coverage. And yet, what is the County doing to educate youth and

the public about drug prevention and treatment? Similarly, what is the County doing to prevent

and alleviate environmental damage from cannabis production? Finally, what is the County doing to ensure the safety of its citizens from the crime resulting from the presence of the cannabis production?

So, you may ask, why are we alarmed? A few select examples underscore the accuracy of the damage and risks that concerned the Proposition 64 drafters.

Health -

The Press Democrat reported a study by the Southern Illinois School of Medicine¹ detailing

reports to the nation's poison control centers of more than 7000 cases of children eating marijuana edibles between 2017 and 2021, climbing from about 200 to more than 3000 per year.

More than half of those cases involved toddlers, ages 2 and 3, and more than 90% got the edibles

at home. Nearly 600 children were admitted to critical care units with depressed breathing or even coma. Almost twice as many were admitted to non-critical care units and more than a third

were seen in emergency rooms.

The health risks of marijuana to children are not limited to directly ingesting it. Not surprisingly,

secondhand marijuana smoke contains many of the same cancer-causing toxins as secondhand tobacco smoke according to Brooke Hoots, a Centers for Disease Control and Prevention epidemiologist. According to the CDC, the substance within marijuana that causes a "high" — tetrahydrocannabinol, or THC — can be passed to young children from secondhand smoke.

Researchers in New York City found about one-third of parents surveyed reported marijuana smells in their home while children were there, according to an article published in January 2021. It took years for the world to understand the damage to children from secondhand tobacco

smoke. Clearly secondhand marijuana smoke presents similar, if not more harmful, risks to children.

These reports are exemplary of the types of risks about which it falls on the County to proactively educate and warn the public in order to protect its youngest citizens from the fallout of

the County's embrace of cannabis.

The negative consequences of cannabis use among our youth has been documented and presents

immediate concerns for our County's teen and young adult population with ramifications impacting the entire County. According to a recent article in the Wall Street Journal²

, “Young people are especially vulnerable to cannabis’s effects because their brains are still developing,” a conclusion confirmed by a study reviewing scans of teenagers’ brains before and after they

1 See The Press Democrat, January 8, 2023

2 Cannabis and the Violent Crime Surge, Allysia Finley, June 6, 2022, Wall Street Journal

3

started using pot. “They found that parts of the brain involved in decision making and morality judgments were altered in pot users compared to nonusers.” The article goes on to detail further

concerns which mandate action by our public health officials.

On the other end of the age spectrum, a new University of California San Diego School of Medicine study has identified a sharp increase in cannabis-related emergency department visits

among the elderly.

“The study, published Jan. 9, 2023 in the Journal of the American Geriatrics Society , identified

a 1,808% relative increase in the rate of cannabis-related trips to the emergency department among California adults ages 65 and older from 2005 to 2019. Researchers used a trend analysis

of data from the Department of Healthcare Access and Information and found that cannabis-related emergency department visits went from a total of 366 in 2005 to 12,167 in 2019.

The significant increase is particularly troublesome to geriatricians, given that older adults are at

a higher risk for adverse health effects associated with psychoactive substances, including cannabis. The study highlights that cannabis use among older adults can lead to unintended consequences that require emergency care for a variety of reasons. Cannabis can slow reaction time and impair attention, which may lead to injuries and falls; increase the risk for psychosis, delirium and paranoia; exacerbate cardiovascular and pulmonary diseases and interact with other

prescription medications.”³

In that study, the author noted, “We know from work in alcohol that older adults are more likely

to make a change in substance use if they see that it is linked to an undesirable medical symptom

or outcome — so linking cannabis use similarly could help with behavioral change,” said Alison

Moore, MD, MPH, co-author of the study and chief of the Division of Geriatrics, Gerontology,

and Palliative Care in the Department of Medicine at UC San Diego School of Medicine. As with young children, this study underscores the need for the County’s public health agencies to

pro-actively educate the public, and particularly older adults, about the risks of cannabis in order

to avert these medical crises.

In regard to adults of all ages, the deleterious effects of cannabis on the cardiovascular health of adults were recently reported by researchers who concluded, "Thus, there is growing evidence from both laboratory and population studies that cannabis consumption may be harmful for cardiovascular health." 4 The impact of cannabis on mental health is similarly alarming. "Overall, use of higher potency cannabis, relative to lower potency cannabis, was associated with an increased risk of psychosis and CUD. Evidence varied for depression and anxiety. The association of cannabis potency with CUD and psychosis highlights its relevance in health-care settings, and for public health

3 Tiffany Kary 1/23/23 Bloomberg Newsletter

4 Frequent Cannabis Use Tied to Coronary Artery Disease Marlene Busko February 28, 2023 <https://www.medscape.com/viewarticle/988902?>

4

guidelines and policies on cannabis sales."5 These concerns as to increased potency of cannabis permeate the impact of the drug in every aspect of public health as processors and manufacturers develop products and methods for increased potency, seemingly without any oversight or concern as to the impact on public health. To fulfill its duty to protect the public health of its residents, the County must impose limits as to potency of cannabis and marijuana products and disclose to residents the full impact of these products on their physical and mental health. In all these settings, the County is uniquely capable of providing outreach to the public to warn and prevent these deleterious outcomes from cannabis and can do so at no cost to the County with the Proposition 64 funding. These deep-seated and long-term public health issues require immediate investigation. The County cannot wait for these outcomes to fully manifest themselves before acting. At that point the proverbial horse will be out of the barn. Environment - Proposition 64 also provides funding to prevent and alleviate environmental damage from illegal marijuana producers. In this regard, it should be noted the environmental risks of cannabis production do not neatly fit into legal or illegal markets. These risks are profound and diffuse, crossing over environmental abuses ranging from water and land use pollution to greenhouse-gas emissions with a litany of other environmental harm along the way. These are all issues about which the County should be alarmed, and which require investigation and assessment as soon as possible. Evan Mills, writing in "The Journal of Impact and ESG (Environment Social Governance) Investing"6

, identifies specific examples of the scope of these environmental issues including but not limited to pollution from pesticide use, water use, land-use change, waste production, volatile

organic compound (VOC) releases to the air, and solvents used to produce extracts. As to the carbon footprint of cannabis, he reported indoor cannabis cultivation requires significantly more energy input than most products and is on a par with that of even the most energy-intensive industrial materials (cement, zinc, copper, and aluminum). For the legal and illicit cannabis markets combined, a decade ago Mr. Mills estimated the corresponding annual energy and greenhouse-gas emissions equal to that of three million cars nationally, a whopping \$6 billion annual energy bill. He concluded that given rising demand, the numbers are likely higher today, and that original analysis did not include the full array of emissions. He further estimated demand for energy by cannabis facilities is growing at such a rate that all of California's existing wind energy, for example, could easily end up being, in effect, diverted solely to power cannabis cultivation. These concerns impact the entire state, and more specifically, Sonoma County, where we particularly value our environment and health.

5

(The Lancet – Psychiatry – Association of Cannabis Potency with Mental Illness and Addiction. – Volume 9, Issue 9, September 2022)

6 <https://evan-mills.medium.com/cannabis-esg-risk-is-a-buzzkill-for-investors-1c9749def519>

5

Again, we believe the County should be immediately taking advantage of the availability of Proposition 64 monies, at no cost to the County, to identify and remediate environmental harm from cannabis operations of all types.

Safety –

The drafters of Proposition 64 also correctly identified safety as among the negative impacts which would flow from its passage and earmarked funds for counties to access to reduce negative impacts on safety resulting from the proposition. The recent headlines underscore the criminality which has flowed from the presence of the cannabis industry in Sonoma County as the robberies of dispensaries have become almost commonplace. While dispensaries in Santa Rosa are charged with providing their own security⁷

, the criminal element they attract impacts

the entire community.⁸

These concerns about safety were recently detailed in a study by the Los Angeles Times entitled

“Legal Weed – Broken Promises”⁹

. In its extensive investigation, the Times reported on the risks and safety abuses throughout the State relating to cannabis production including the safety and health risks to those being hired to work in that industry. That report included extensive investigation in Northern California. The Times' findings provide ample evidence for the need for the County to avail itself of the Proposition 64 funding in order to mitigate the negative impact of cannabis on our County and to keep its citizens safe.

Conclusion -

These concerns and examples are the proverbial tips of the icebergs which the County must

navigate if it is to fulfill its duty to protect the health and safety of its citizens as well as to protect our environment from harm as a result of the passage of Proposition 64. The immediate access to these funds and the implementation of the information and programs flowing from those actions dovetail with the County's undertaking revision of its health ordinance on April 4, 2023. Fortunately, the funding for the County to accomplish those objectives is provided without cost by The California Marijuana Tax Fund. Those monies should allow the County to delve deeply into these issues to identify them, educate people about them, and to prevent, or at least limit, the harm foreseen by Proposition 64 and the legalization of cannabis. We ask that you, as the new navigator for the County's ship of state, navigate those icebergs by aggressively seeking solutions to these problems using that funding to insure the health and safety of our County and its citizens.

Neighborhood Coalition

Nancy and Brantly Richardson, Communications Directors

SonomaNeighborhoodCoalition@gmail.com

7 Santa Rosa City Ordinance 2017-025-G. Security

8 See Santa Rosa Press Democrat 1/19/23 and 2/4/23 front page articles; also see

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