

Public Comment Regarding Cannabis Ordinance and
Program Update

Received February 2024

From: [Karina Garcia](#)
To: [Cannabis](#)
Subject: FW: cannabis proposal
Date: Thursday, February 1, 2024 11:46:35 AM

Karina Garcia
Office of Supervisor Gorin | 1st Supervisorial District
Karina.Garcia@sonoma-county.org | 707.565.1776

From: Chris Koch <ckoch812@gmail.com>
Sent: Tuesday, January 9, 2024 5:16 PM
To: PermitSonoma <PermitSonoma@sonoma-county.org>
Cc: Susan Gorin <Susan.Gorin@sonoma-county.org>
Subject: cannabis proposal

EXTERNAL

To Sonoma County Board of Supervisors and Permit Sonoma,

Sonoma County should not subsidize or support Cannabis cultivation. Cannabis crops reek. They do not benefit the County or residents. The site near the Atwater Ranch on Highway 12 smells for months. The smell is very unpleasant, like a skunk, and travels great distances.

Issue #1 - Neighborhood compatibility goals are not being met:

The Board of Supervisors clearly stated the primary goals of updating the cannabis program were to **enhance neighborhood compatibility and environmental protections**. Permit Sonoma's recent draft update to the cannabis program does not contain steps to achieve those goals. In fact, the outlined proposals make the situation worse.

Permit Sonoma's proposed changes will greatly increase the number of parcels in neighborhoods that can be permitted for outdoor cannabis grows. This contradicts the stated goal and would exacerbate compatibility problems.

Please deliver on your promise to protect our neighborhoods where we live by

increasing setbacks for outdoor cultivation to at least 1,000 feet from property lines, drop your plan for retail at grow sites and push your focus to indoor grows that are away from our homes.

Issue #2 – Setback rules need to be increased

The draft proposal provides for a minor increase in setbacks between cannabis operations and residential property lines to 300 feet. Yet the current law provides for 1,000 foot setbacks for “sensitive uses” areas such as schools and parks. The same 1,000 foot setbacks should be applied to homes. The smells and risks travels beyond 1000 feet. .

Issue #3: Cannabis parcel size needs to be increased not reduced:

In response to the public outcry over commercial cannabis into neighborhoods, in 2018 the BOS adopted the 10 acre minimum rule in an attempt to address the conflicts. Now Permit Sonoma is proposing to reduce this to 5 acres, which brings more commercial cannabis into residential areas. There are over 6,000 parcels that are 20 acres or larger and are away from residential homes that can accommodate cannabis. The minimum parcel size should be increased, not reduced to meet setback requirements for odor and noise.

Issue #4: Odor and exposure to beta-myrcene, a Prop 65-listed carcinogen:

Cannabis terpene odors are air-borne. They threaten the health of neighbors (e.g., nausea, respiratory problems) who cannot protect themselves from the tainted air. Permit Sonoma’s draft update cannabis policy forces exposure to known carcinogens, including beta-myrcene, a Proposition 65-listed carcinogen. This is likely illegal. Please enforce the health and safety requirements and protect all neighborhoods by excluding all cannabis permits where residences are located. No cannabis terpenes should be allowed to enter a non-cannabis parcel.

Issue #5: Plans for visitor activities and retail at cultivation sites:

Permit Sonoma is now proposing “incidental uses” be allowed at cannabis grow sites including: retail sales, educational tours, and special events. These uses are incompatible with nearby residential neighborhoods and are subject to abuse with no realistic enforcement possible. We’ve learned from the winery events challenges and AirBnB issues and don’t need to make the same mistake again. These incidental uses should be disallowed.

Issue #7: “Use permit” required for cultivation:

Permit Sonoma staff and the Ag Commissioner seem to acknowledge the disasters of the ministerial cannabis permitting scheme whereby the public cannot comment on a proposed permit and no site-specific environmental analysis is done. Some growers gamed the system to obtain multiple, illegal outdoor cannabis permits. The draft proposal eliminates ministerial permitting. Nevertheless, Permit Sonoma's suggestion that the EIR might streamline the approval all site-specific applications is very problematic. The programmatic EIR cannot address the various environmental and residential compatibility issues unique to each site. The review process (i.e., CEQA checklist) must require enough site-specific analysis and neighborhood input to assure compliance with the intent of the law.

Issue #8: Outdoor grows should not be allowed

The Environmental Impact Report should analyze a project alternative which would **ban** outdoor cannabis cultivation. This crop reeks and outdoor cultivations should not be allowed. Sonoma County is the only Bay Area County to allow outdoor cannabis grows. The General Plan update and the revised cannabis ordinance should disallow outdoor cultivation.

Thank you for your consideration.

Sincerely yours,

Chris Koch

PO Box 182

Kenwood, CA 95452

Ckoch812@gmail.

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From: [Karina Garcia](#)
To: [Cannabis](#)
Subject: FW: BENNETT VALLEY-SONOMA CO MARIJUANA COMMENTS
Date: Thursday, February 1, 2024 11:44:51 AM

Karina Garcia
Office of Supervisor Gorin | 1st Supervisorial District
Karina.Garcia@sonoma-county.org | 707.565.1776

From: michael.mansfieldfamily.com <michael@mansfieldfamily.com>
Sent: Thursday, January 4, 2024 4:53 PM
To: Susan Gorin <Susan.Gorin@sonoma-county.org>
Cc: theresa.mansfieldfamily.com <theresa@mansfieldfamily.com>
Subject: BENNETT VALLEY-SONOMA CO MARIJUANA COMMENTS

EXTERNAL

Thank you for the invitation and I'll review the transcript.

I know we conversed in the past about not allowing marijuana growers into Santa Rosa and specifically Bennett Valley. I live up the hill from the Wellspring grow and can easily see from below my pool and smell the skunk stink for months. Additionally, the odor is a carcinogen. It's just a matter of time before people will start to sue the county. Someone cut thru my fence and I'm guessing to access the farm.

Please focus on County Health Care and not on a product that tears our health apart in so many ways.

Please let me know if you have any questions or would like further information on the health consequences of consuming, living near a grow, the stink and the water, fire, transportation issues.

I listed below some concerns:

- A. Permit Sonoma is ignoring the requests of six organizations that asked Bennett Valley to be designated an exclusion zone where commercial marijuana activities are banned. If Bennett Valley were designated an exclusion zone most of our problems will disappear.
- B. Many homes were plagued last summer and fall by the skunk-like odor of marijuana, which includes the carcinogen beta-myrcene. If the county allows marijuana cultivation in Bennett Valley, it must undertake a detailed air quality model of the foul odors of marijuana. Much of Bennett Valley could have unbreathable air in late summer and autumn if large parcels are allowed to cultivate marijuana.
- C. Permit Sonoma continues to allow "temporary" hoop houses that mar our scenic vistas because they are up six months each year, not all year.
- D. Even if the ordinance is improved, Permit Sonoma may "grandfather" existing troublesome

cultivation sites. Wellspring Road has operated allowed since 2018 without undergoing environmental review or allowing neighbors to object.

- E. Permit Sonoma proposes to allow retail sales at cultivation sites such as Wellspring Road and Enterprise Road. Sales locations have suffered scores of armed robberies throughout the Bay Area, and Bennett Valley has no effective law enforcement. Just last week [a police officer was murdered during a robbery of a dispensary in Oakland](#).
- F. Permit Sonoma should ban outdoor cultivation like all other Bay Area Counties. Outdoor cultivation generates no tax revenue, is subsidized by our property taxes, and is responsible for most neighborhood problems.

Thank you,

Theresa & Michael Mansfield
6628 Bennett Valley Rd.
Santa Rosa, CA 95404
michael@mansfieldfamily.com
707 545-7217
Cell 650 400-5440

From: Supervisor Susan Gorin <susan.gorin@sonoma-county.org>
Sent: Thursday, January 4, 2024 11:45 AM
To: michael mansfieldfamily.com <michael@mansfieldfamily.com>
Subject: 2024 State of the Valley



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Dear Michael,

Supervisor Gorin will be speaking at the State of the Valley event hosted by the Sonoma Valley Chamber of Commerce. All are welcomed to attend. Details below.



State of the Valley

Friday, January 5, 2024 (5:00 PM - 7:00 PM)

Andrews Hall, Sonoma Community Center, Sonoma

Featuring 2023 Overview and 2024 Goals & Vision Presentations by:

- United States Congressman Mike Thompson

- Sonoma County Supervisor Susan Gorin
- 2023 City of Sonoma Mayor Sandra Lowe

Additional Presentations:

- Welcome Greeting from 2024 Sonoma Mayor John Gurney
- Chamber "Business of the Year" & "Nonprofit of the Year" Awards

For more info contact Sonoma Valley Chamber of Commerce

info@sonomachamber.org 707.996.1033

Due to limited space, Registration is Required. Registration fee of \$10 per guest helps Sonoma Chamber offset the costs of producing this event. Fee is waived for any Sonoma Valley resident with a financial hardship by using Promo Code "community" at checkout. Community Sponsorships are available on the registration page. Sponsorships support the Chamber and help ensure that anyone in Sonoma Valley can attend this event regardless of their ability to pay. More details on the registration page.

[Register Here](#)



Susan Gorin, 1st District Supervisor

Stay Connected



Supervisor Susan Gorin | 575 Administration Drive, Santa Rosa, CA 95403

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Sent by susan.gorin@sonoma-county.org powered by



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From: [Susan Gorin](#)
To: [Cannabis](#)
Subject: FW: I Support Agricola Flower & Nursery UPC20-0001
Date: Thursday, February 8, 2024 12:23:27 PM

From: Lydia89@modernaction.io <Lydia89@modernaction.io>
Sent: Thursday, February 8, 2024 10:22 AM
To: Susan Gorin <Susan.Gorin@sonoma-county.org>
Subject: I Support Agricola Flower & Nursery UPC20-0001

EXTERNAL

Dear Susan Gorin,

I strongly support small craft legacy cannabis farms of which Agricola Flower & Nursery is one of the last remaining in the county. Sonoma county has seen a huge decline in cultivators since the introduction of its Ordinance and I support the existence and preservation of the ones that remain despite Sonoma county changing the rules after the fact.

Sincerely,
Lydia Waters

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From: [Neighborhood Coalition](#)
To: [Tennis Wick](#); [Scott Orr](#); [Crystal Acker](#)
Cc: [Cannabis](#)
Subject: Comments on Comprehensive Cannabis Program Update – Pros and Cons of Indoor vs Outdoor Cultivation
Date: Thursday, February 22, 2024 2:31:14 PM
Attachments: [NC Indoor vs Outdoor Feb 22 final.pdf](#)

EXTERNAL

Please see our attached comments regarding Pros and Cons of Indoor vs Outdoor Cultivation.

Neighborhood Coalition

Nancy and Brantly Richardson, Communications Directors
[SonomaNeighborhoodCoalition@gmail.com](mailto:Sonomaneighborhoodcoalition@gmail.com)

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February 22, 2024

Tennis Wick, Director (Tennis.Wick@sonoma-county.org)
Scott Orr, Assistant Director (scott.orr@sonoma-county.org)
Crystal Acker, Supervising Planner (crystal.acker@sonoma-county.org)
cc: cannabis@sonoma-county.org

**Re: Comments on Comprehensive Cannabis Program Update:
Pros and Cons of Indoor vs Outdoor Cultivation**

Dear Tennis, Scott, and Crystal:

The Neighborhood Coalition advocates for sustainable, environmentally sound, and neighborhood-compatible cannabis policies in Sonoma County. This submission on pros and cons of indoor vs outdoor cultivation is part of a series of comments on the elements of the cannabis program update that Permit Sonoma released in support of its December 13 meetings.

Policies concerning indoor vs outdoor cultivation are a vital component of Permit Sonoma's "...effort to improve compatibility between cannabis land uses and the neighborhoods they are located within or near."¹ This submission, among other things, responds to Permit Sonoma's statement "Cannabis cultivation outdoors is encouraged over cultivation in fully enclosed structures in agricultural areas to protect and conserve agricultural soils for agricultural production."²

Pros of Indoor (including Greenhouse) and Cons of Outdoor Cannabis Cultivation

1. INDOOR CULTIVATION IN INDUSTRIAL ZONES

Lower Cost / Usage of Public Infrastructure

- Water usage is less compared to outdoor cultivation. Due to the controlled indoor environment, much less water is lost to evaporation. Additional water customers help reduce costs for all ratepayers.
- Energy is provided with 100% renewable sources, making the carbon footprint net zero (required in current cannabis ordinance).

¹ Press Release, Permit Sonoma to host cannabis ordinance update information meetings Dec. 13 (Nov. 29, 2023).

² General Program Elements for Cannabis Land Uses, p. 1 (November 2023).

- Water usage does not require energy for pumping from water wells and does not deplete groundwater.
- Sewer infrastructure is already in place, and additional customers help defray costs
- Industrial zones are close to major highways as well as public transit, so there will be significantly fewer vehicle miles traveled (VMT), further reducing greenhouse gas emissions. It is also more economically-favorable for the workers, both for reduced travel time as well as reduced travel costs.

Public Safety

- Security and law enforcement is readily available. Indoor cannabis facilities can be locked, greatly reducing the risk of theft.
- Emergency response providers can respond immediately.
- Access and fire-safe road evacuation are not issues.
- If desired by the county and allowed by the state regulations, retail sales and/or tours at the cultivation site could be safely achieved in industrial zones with strong security throughout and quick access to law enforcement.

Public Health

- Odor can be fully controlled with use of proper filters assuring no terpenes will leave the facility. Monitoring can be readily achieved to confirm compliance.
- Proposition 65 required warning for exposure to the carcinogen beta-myrcene can be achieved inside the facility, and workers can wear appropriate protective clothing and respirator masks.

Better Economics for Cultivators

- The cannabis produced is of higher quality and value (preferred by consumers) than that grown outdoors. Multiple harvests can be achieved in a smaller space per year making indoor more economically viable.
- Expedited permitting is viable as most of the required analyses can be done in advance for the industrial zones (water, sewer, security, odor, access, fire, evacuation, emergency response, etc.). This is a huge benefit to both the applicants and the county.
- Cultivation is economically viable, has lower enforcement costs, and provides positive tax revenues to the county.

Addresses Neighborhood Compatibility

- Aesthetics to surrounding countryside is not an issue due to industrial zoning.

- Neighborhood compatibility is not an issue; few residences are in the vicinity.

2. MIXED-LIGHT/GREENHOUSE CULTIVATION IN INDUSTRIAL ZONES – In addition to the above points:

- Use of 100% renewable electricity, plus use of sunlight reduces costs.

3. OUTDOOR CULTIVATION: ISSUES FOR BOTH AG AND RRD ZONES:

Contamination of Public Trust Resources and Higher Energy Use

- Water usage is very high, ~6 gal/plant/day, and much is lost to evaporation.
- Groundwater is depleted. Many RRD areas are in Class 3 or 4 water scare zones. Additional demand and drought conditions have resulted in much Ag land having poor water availability, with documented groundwater depletion issues even in Class 2 zones during drought years.
- Pumps for wells use large quantities of electricity. Currently there is no requirement for renewable energy for well pumps, irrigation pumps or any other activities for outdoor cultivation.
- Large amounts of pesticides, fungicides, and chemical fertilizers are used, which can contaminate the waterways, aquifers, and surrounding areas even when properly used. Generally, this is not regularly monitored due to funding constraints.
- Outdoor cultivation on both RRD and Ag-zoned lands causes significant negative visual and environmental impacts, including from use of hoop houses with disposable plastic sheeting, ground water depletion, waste-water disposal, and disposal of soil bags each year. Additionally, use and improper disposal of pesticides/fungicides is harmful to the environment. Much greater county expenses are needed to enforce proper usage and disposal, which would generate additional costs to taxpayers. But even “proper” use outdoors contaminates the environment.
- Most outdoor cultivation uses trucked-in and highly-amended soil in large bags for each cannabis plant; thus, a one-acre cultivation site would have ~2000 imported soil bags 5-6 ft diameter, instead of growing the plants in the native soil in the ground. The “spent” soil bags are disposed of each year and new ones brought in, also contributing to negative environmental impacts and landfill. This is a key point as contrary to popular belief, outdoor cultivation is not done in soil in the ground but rather in pots/bag, hence the native soil is not being protected, improved, or preserved.
- Public Health and Social Justice. Beta-myrcene, often the dominant terpene emitted by cannabis, is a carcinogen on the State’s Proposition 65 list of toxins and inundates neighbors 24/7. Conditions have changed now that there’s more science-based research:

The EIR must study the fact that cannabis cultivation exposes neighbors as well as workers to a carcinogen.

- To our knowledge, exposure to a carcinogen was never considered in any previous county deliberation. We know of no other natural farm odor (vs. cultivation chemicals) that is a known carcinogen and regulated under Proposition 65. Forcibly exposing neighbors to this carcinogen 24/7 compromises their health and violates their legal rights to enjoy their property (ORD 6245 § 26-80-250(f); [MAUCRSA § 26011.5](#); [CCC § 3479](#)), as well as violates the notification requirements of Proposition 65.
- Outdoor workers are also exposed to high levels of the carcinogen beta-myrcene. As the cannabis workers are often ethnic minorities, this further creates workplace inequities.

Neighborhood Compatibility and Public Safety

- Retail sales or tours at the cultivation site should never be allowed on Ag or RRD-zoned parcels due to safety concerns and high risk for criminal activity. These sites are often far-removed from law enforcement response. Criminal activity endangers nearby residents, and may impact their properties (cut fences, etc.).
- To prevent exposure of neighbors to odors and carcinogens and to address other neighborhood compatibility issues (e.g., noise, traffic, odors, crime), very large parcels (over 100 acres for even a 1-acre cultivation) in RRD would be needed to achieve even 1000 ft setbacks, and parcels of several hundred acres needed to achieve longer setbacks (also for larger cultivation areas) to prevent odor from impacting neighboring parcels. Similar setbacks are needed to comply with the General Plan's Noise Element.
- Multiple outdoor cultivation sites would blanket large surrounding areas with the noxious cannabis skunk-like stench (containing high levels of carcinogens), reducing desirability of tourism, negatively impacting wine tasting rooms (as has occurred in Santa Barbara County), and potentially contaminating other consumable crops including wine grapes (also a complaint in Santa Barbara County).

Permitting and Enforcement Costs are Higher – uses taxpayer dollars

- The permitting process is time-consuming and expensive, with extensive analysis (both CEQA and other: water, fire safety, access roads, traffic, evacuation safety, aesthetics, energy, wildlife, biotic resources, neighborhood compatibility, etc) required for each site.
- The on-going periodic compliance process for outdoor cultivation is much more time-consuming and expensive than for indoor cultivation as the review process is more extensive (i.e.: water, waste, security evaluation, odor, visual aesthetics, measure of cultivation area, health, safety, and building code validation, etc.) and requires more travel time and personnel time. These expenses are paid for by the county (i.e., taxpayer dollars), not the cultivators.

- Outdoor cultivation is NOT economically viable and requires taxpayers to subsidize County activities such as enforcement. The County's 2022 economic analysis ([HdL, Fiscal Analysis of the Commercial Cannabis Cultivation Industry](#)) determined that outdoor cannabis is not and will not become a viable business, nor will it ever deliver the tax revenue that supervisors and other advocates promised would pay for a wide range of county programs.
- Outdoor cannabis cultivation has been found to be incompatible with other agricultural operations.
 - In Santa Barbara County, grape and vineyard owners have found the odor has reduced visitor traffic and product salability.
 - In Yolo County the traditional agricultural growers and the farm bureau have challenged the Cannabis Ordinance/EIR as it threatens their traditional way of farming that creates both dust and utilizes chemicals inconsistent with cannabis.

Additional Issues with Outdoor Cultivation on RRD-Zoned Parcels:

- RRD lands are typically large parcels in remote locations. Thus, they often have limited access and are far removed from law enforcement or fire protection services.
- Access roads are poor, often single-lane or long dead-ends, not meeting requirements of the State Minimum Fire Safe Regulations.
- Large parcels in RRD are usually in high or very high fire risk areas; many have been subject to wildfires in recent years. Sites are often in hilly and forested areas, close to endangered and protected watersheds.
- Removal of timberland is often required for outdoor cultivation. Unpermitted timber removal in RRD has been ignored when permitting cannabis cultivation.
- RRD lands are often in environmental sensitive areas with wildlife, surface water, groundwater, and biotic restraints, making them incompatible for land intensive use like cannabis cultivation.
- The primary use of RRD ([General Plan, Policy for Resources and Rural Development, LU67](#)) is to "...protect lands used for timber, geothermal and mineral resource production and for natural resource conservation". "Single family dwellings" are the first permitted use listed for RRD in the General Plan, followed by "...resource management and enhancement activities including but not limited to the management of timber, geothermal and aggregate resources, fish and wildlife habitat, and watershed."
- Furthermore, cannabis cultivation is classified as commercial operations, and thus should not even be allowed in RRD as commercialization violates allowed activities in the General Plan.

Additional Issues with Outdoor Cultivation on Ag-Zoned Parcels:

- Prior to the 1989 General Plan, many Ag-zoned parcels had been subdivided into smaller parcels that are now primarily residential in nature. Many are no longer truly viable agricultural areas and are no longer compatible with commercial operations.
- Such subdivided Ag-zoned parcels occur throughout the Dry Creek and Russian River watersheds. Any outdoor cultivation on such Ag parcels invariably causes major neighborhood compatibility issues.
- Small-parcel sized properties near transit corridors, near cities, and next to or surrounded by residential-zoned areas and accordingly should be rezoned as residential.
- Imposing minimum 1000 ft setbacks to neighboring parcel boundaries would help in some cases, but not in others where the same access road is used for the commercial cannabis operations that is also sole access for residences. The issue of shared access roads impinging on neighbors' rights to peaceful enjoyment and safe use of their property also applies in RRD.
- Neighborhood compatibility is far from being solved. The current ordinance specifies 100/300 feet as minimum setbacks for outdoor cultivation, which are then subject to the Health and Safety Clause § 26-88-250(f). That requirement was ignored in many approvals resulting in violations of health and safety of nearby residents, subjecting them to strong noxious odors containing carcinogenic gases, as well as subjecting them to frequent disturbances from noise and traffic.
- Although 1000 ft setbacks to parcel lines would help, cannabis odors travel over 3000 ft (See Ortech presentation to Permit Sonoma, December 13, 2019,) and even more in windy conditions. Environmental impacts and cumulative impacts might further worsen the proposed program elements.

RECOMMENDED ACTIONS – AREAS OF STUDY IN DRAFT EIR:

We respectfully request that Permit Sonoma and the Board of Supervisors take the following actions.

1. Like other Bay Area counties and Napa County, provide incentives for cultivators to rent space in warehouses or greenhouses.
2. Enact a moratorium on all new outdoor cannabis cultivation permitting until a full environmental and public health review is completed, adequate mitigations defined, and a revised ordinance is adopted.
3. Require expiring outdoor permits to apply for a use permit subject to the requirements of the new revised ordinance. Pursuant to § 26-88-250(e), the permit holder has no property interest, vested right, or entitlement to receive a future permit under the

previous requirements.

4. For cultivations that continue to violate the current ordinance, including being incompatible with the health and safety of nearby neighborhoods and that expose the public to harm, invoke § 26-88-252 and terminate existing permits because circumstances under which the permits were granted have changed or they were granted in error. Exposure to the carcinogen beta-myrcene is one such threat that was not considered in the initial approval of outdoor cultivation or improperly filtered indoor/greenhouse cultivation.
5. Do not allow ministerial permits – complete the required studies for thorough CEQA analyses for industrial-zoned properties and ensure mitigations that provide required protection to the environment, the public, and groundwater resources.
6. Complete EIR studies of the negative environmental, public health, and safety effects on surrounding residences associated with non-conforming cannabis cultivation sites that are allowed to operate under the out-of-date requirements of the prior ordinances.
7. Include an EIR alternative that studies banning all outdoor cultivation, sunseting all existing outdoor cultivation permits, and allowing only indoor and greenhouse cannabis cultivation on industrial-zoned lands.
8. If an outdoor cultivation option is desired for study, the EIR should study it only as one of the required alternatives and with it limited to Ag Zones lands only, not RRD.

Thank you in advance for listening to and addressing our concerns.

Neighborhood Coalition

Nancy and Brantly Richardson, Communications Directors
SonomaNeighborhoodCoalition@gmail.com