

**From:** [BOS](#)  
**To:** [Andrea Krout](#); [Arielle Kubu-Jones](#); [Che Casul](#); [Chris Grabill](#); [Christina Rivera](#); [David Rabbitt](#); [Debbie Ramirez](#); [district3](#); [Hannah Whitman](#); [James Gore](#); [Jason Wilson](#); [Jenny Chamberlain](#); [Keith Roberts](#); [Lupe Catalan](#); [Lynda Hopkins](#); [Marbella Duenas](#); [Robert Pittman](#); [Susan Gorin](#); [Tina Thomas](#); [Tracy Lyons](#); [Zaira Enriquez](#)  
**Cc:** [McCall Miller](#); [Cannabis](#)  
**Subject:** FW:  
**Date:** Friday, May 10, 2024 1:04:50 PM  
**Attachments:** [image.png](#)

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**From:** Neighborhood Coalition <[sonomaneighborhoodcoalition@gmail.com](mailto:sonomaneighborhoodcoalition@gmail.com)>  
**Sent:** Friday, May 10, 2024 12:50 PM  
**To:** BOS <[BOS@sonoma-county.org](mailto:BOS@sonoma-county.org)>; Tennis Wick <[Tennis.Wick@sonoma-county.org](mailto:Tennis.Wick@sonoma-county.org)>; Tyra Harrington <[Tyra.Harrington@sonoma-county.org](mailto:Tyra.Harrington@sonoma-county.org)>  
**Subject:**

**EXTERNAL**



May 10, 2024

The Neighborhood Coalition advocates for sustainable, environmentally sound, and neighborhood-compatible cannabis policies in Sonoma County in conjunction with education of the public on the health impacts of cannabis use. We support Sonoma County's Cannabis Code Enforcement to increase the penalties for illegal cultivation.

We also support Cannabis Code Enforcement making quantitative measurements this growing season to investigate cannabis cultivation odor complaints.

The time is long past to regard such complaints as subjective when they can be measured scientifically with off the shelf, established technology. We believe that the cultivator should be charged all expenses related to odor investigations. This should be instituted immediately in order to achieve compliance with the existing local and state requirements of no nuisance due to odor.

We recommend using mobile gas chromatographic quantitation to measure objectively the levels of terpenes, the carcinogen Beta-Myrcene, at the parcel line. This will provide objective, not subjective information about odor levels. It is well-established that the lower limit that humans detect the odors for cannabis is 10 ppb.

We are recommending that the revised ordinance must require quantitative gas chromatographic monitoring of terpenes and specify levels at the lower limit of human detection not to be exceeded at parcel lines.

Thank you for considering and hopefully acting on our suggestion.

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

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**From:** [Neighborhood Coalition](#)  
**To:** [Tennis Wick](#); [Scott Orr](#); [Crystal Acker](#)  
**Cc:** [Cannabis](#)  
**Subject:** Suggested Alternatives to Study in EIR  
**Date:** Friday, May 10, 2024 8:00:26 AM  
**Attachments:** [image.png](#)

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EXTERNAL



**NEIGHBORHOOD  
COALITION**

[NeighborhoodCoalitionSonomaCounty.com](http://NeighborhoodCoalitionSonomaCounty.com)

May 10, 2024

At a meeting with Tennis Wick on May 8, representatives of the Neighborhood Coalition learned that we can suggest alternatives we think should be studied in the EIR.

The following are the Neighborhood Coalition's suggestions:

- 1) Minimum 1,000-foot setbacks to all residences regardless of zoning (for outdoor cultivation and processing).
- 2) Quantitative (Gas Chromatography) and real-time odor measurement over a minimum 24-hour period when an odor complaint is made. Measurements should include, at minimum, Beta-Myrcene and 2-3 other main terpenes at parcel line of cannabis operation. If the measurement is above 10 PPB, mitigation must bring odor level down to cutoff or less. If mitigation cannot achieve this performance standard, the cultivation site must shut down.
- 3) Only indoor and greenhouse grows are allowed, no outdoor. Indoor and greenhouse grows require full odor filtration to achieve odor below 10 ppb threshold levels at parcel line. If located in Ag or RRD, minimum parcel size 20 acres with 300-foot min setbacks.
- 4) Minimum parcel size 100 acres for outdoor cultivation.
- 5) Outdoor cultivation allowed only on Ag-zoned lands, not in RRD.

- 5) No on-site retail except in industrial zones.
- 6) Cannabis events only at fairgrounds or in industrial or commercial zones.
- 7) Map county for areas appropriate for Exclusion Zones:
  - a) Areas accessed by dead-end roads > 1 mile, or roads < 20 feet wide excluding shoulders and striping
  - b) Areas in high or very high fire hazard severity zones
  - c) Areas where the primary residential nature is to be preserved, especially where many contiguous parcels under 10 acres are grouped together.
  - d) Areas with critically impacted watersheds or in Class 3 or 4 water scarce zones
  - e) Areas where the scenic character is to be preserved.
  - f) Areas where law enforcement is inadequate because average response times are more than 15 minutes.
- 8) Sunset all existing permits with old setbacks but while they are operating, hold them to odor threshold standards while they continue operations. Do not accept or approve new permit applications until the new ordinance is final.
- 9) Manufacturing only in industrial zones.
- 10) Any violation of state licensing requirements is a violation of the cannabis ordinance.

Thank you for considering and addressing our suggested alternatives.

Neighborhood Coalition

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

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**From:** [SVCG](#)  
**To:** [Cannabis](#)  
**Subject:** Comment: proposed ordinance amending Section 1-7.1 of the Sonoma County Code  
**Date:** Sunday, May 12, 2024 10:35:44 AM  
**Attachments:** [meO0WFgFhDNS3WRe.png](#)  
[2SBsfXDm3CMg5IDI.png](#)  
[TuM07CfBTdYd8NE.png](#)

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**EXTERNAL**



To: Board of Supervisors

We urge the Board of Supervisors to *not* continue penalizing patient/caregiver medical grows over 100sf and personal adult-use grows over 6 plants as “commercial”, regardless of whether any evidence of commercial activity is present.

We would refer you to comments made by Lauren Mendelsohn of the Law Offices of Omar Figueroa regarding this matter.

Sincerely,

Gil Latimer, Founder, Sonoma Valley Cannabis Group



**Sonoma Valley Cannabis Group | For responsible health care policy**

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