

**From:** [Cannabis](#)  
**To:** [Christina Rivera](#); [Chelsea Holup](#); [Scott Orr](#); [Andrew Smith](#); [Jennifer Klein](#)  
**Subject:** FW: Changes to the Cannabis Operator Permitting Should be Denied  
**Date:** March 18, 2021 2:20:07 PM

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**From:** James Dugdale <james@friendsf.com>  
**Sent:** Thursday, March 18, 2021 2:18 PM  
**To:** Cannabis <Cannabis@sonoma-county.org>  
**Subject:** Changes to the Cannabis Operator Permitting Should be Denied

## **EXTERNAL**

### **Members of the Planning Commission and to All Members of the Board of Supervisors of Sonoma County:**

**The recommended changes to the cannabis operator permitting should not be approved: they are heavily weighted toward favoring commercial cannabis operators and heavily burden the residents and local environment - please do not approve these changes.**

**Cannabis should not be recategorized as an agricultural crop.** The growing and production of cannabis produces a controlled substance, with little to no processing. That's not agriculture, that's the equivalent of pharmaceutical production. Cannabis growth and production (much like pharmaceuticals) should be governed by state agencies that oversee pharmaceutical production operations.

**The proposed terms for ministerial permits have the high propensity to lead to independent judgements with unintended outcomes by county personnel, with the potential for corruption; this is a mistake and it should not be allowed.**

**The lot sizes and setbacks for growing cannabis should be increased, not decreased; and a "10% of lot size" option should not be allowed.** An acre of cannabis is already too large for any area that has residences nearby. Growing cannabis creates a putrid smell and increases the probability of crime on the growing site which can easily spill over to neighboring properties. The current setbacks are not nearly big enough as it is. They should be increased, not decreased. And there should be no difference in the setbacks between sensitive areas and any other areas with families or businesses: they are all sensitive. The minimum setback should be at least 1000. The Board of Supervisors was moving this direction previously, and it should continue to do so.

**There should be a CEQA and a MND report required for every commercial operation. These reviews should be made available for public review and comment. They should be conducted every three to five years for each commercial grower.**

**There should be no on-site processing allowed, nor should there be any on-site distribution or trucking.** Both of these activities open the opportunity for abuse, and will inherently lead to criminal activity, or an invitation to violation by the commercial operator or its staff.

**It should be mandated that security lighting not extend beyond the commercial property.**

**Growing operations should not be visible by any properties, private or public, nor should they be visible from any public roadway: they are a visual blight.**

**Hoop houses should not be allowed to have electricity or plumbing, and they should not be allowed to be up or operational throughout the year.**

**Ground water testing should be done annually for GPM as well as chemicals (to prevent excess leaching into the soil, neighbors properties, and the local waterways).**

**The changes should include terms for compensating or "making whole" the neighbors and local community for damage done by the commercial growers and/or their crop production.**

I do not support the proposed changes. Simply said, they are bad for Sonoma County.

**I request that my comments be added to the public comments section, and that my name and contact information remain anonymous.** I am happy to speak with members of the Planning Commission and Board of Supervisors.

Regards, Jim Dugdale  
415-640-2005

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