

## ALTERNATIVE RECOMMENDATIONS TO THE SUPPLY CHAIN ALIGNMENT REPORT

### Number 9. **Allow Microbusiness permits.**

Recommend tabling this item for future study. There are too many flaws in the existing ordinance to iron out before throwing a new permit type into the mix. The County has a revolt in non-conforming DA as well as other zones and has the issues of oversaturation and adjacency plus the thorny problems of inclusion/exclusion overlay combining zones to examine before they embark on entirely new type of business permit. Code Enforcement will probably never be fully staffed enough to regulate manufacturing 7 at cultivation sites and Permit Sonoma should not be tasked at this time to identify which zones may be appropriate for which type of micro business permits. The Supply Chain Alignment report itself is confusing in that manufacturing 7 (volatile solvents) is recommended to be allowed only in Industrial zones but the item pops up again as a possible qualifier for one of the multiple uses (manufacturing) necessary for application for the micro business permit.

a. There is no need to rush through another complicated topic; address this type of permit sometime in the future.

b. Suggest referring to this permit as “Vertically Integrated Cannabis Business Permit”. It is a misnomer to call this permit a “micro” permit as there is no reference to size nor is there any mechanism to restrict the size of the operation.

c. Recommend no consumption on premises or portion thereof. Recommend no consumption at dispensaries. Code Enforcement is having a difficult job keeping up with violations of events at wineries and cannot take on additional cannabis related complaints. At this time State and local law enforcement cannot deal with people who have overindulged and are driving from an event.

### 10. **Allow Transferability of Permits and Temporary Penalty Relief.**

Each new applicant must start the process again. The public needs to know who the permit is being issued to. There are standards as to who can get a permit. If the permits are transferable, the County and the public will be denied the ability to weigh in on the applicant.

Furthermore, if the applicant did unpermitted work during the period of penalty relief, they should immediately be disqualified from the program. Penalty relief is a good faith program. If the applicant does not show good faith, they should immediately lose the benefits of the program.

a. Disagree with recommendation

11. **Privacy of Records.** Number 9 highlights the similarities between a cannabis microbusiness and the wine tasting rooms where tourists from all over the world may visit the operation, stroll through the gardens, watch the extraction and production process and educate themselves on the unique cannabis grown in this County. Yet, number 11 recommends that addresses of

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cultivation facilities not be made public for public safety reasons. Instead the suggestion is to use P.O. boxes, agents of service, or mailing addresses. The combination of number 9 and number 11 are a perfect example of cognitive dissonance or holding two contradictory ideas at the same time. Cultivation sites either DO NOT have public safety issues or they DO have public safety issues. It makes no difference if one parcel can grow, manufacture, distribute and sell and the other parcel may only grow.

Commercial growers in residential areas subject their neighbors to dangers and are essentially hiding themselves among residents. In their request to remain anonymous they admit the inherently dangerous business they are conducting. The operations are not safe, and they belong in well protected industrial zones.

a. Public records cannot be secret.

14. **Sensitive Use Radius.** Retain the 1000-foot setback from parks and schools and other sensitive spots. During the fall of 2016, the Sonoma County Office of Education recommended this setback during a public meeting and there is no reason for change. The idea that this rule was enacted during an era when the federal government was targeting closing dispensaries based on federal drug laws is specious.

Parents take their children to parks that don't have playground equipment. Children, adults, people with sensitive conditions, etc. all use and hike in our parks. Operations must be placed where they do not interfere with the rights of the public to enjoy public land.

a. Recommend no change to the ordinance