



## **Sonoma County Cannabis Program Virtual Visioning Sessions Summary Report**

**Prepared by Bischoff Consulting, Sonoma, CA  
August 27, 2021**

### **Summary Report of Public Comment:**

#### ***Sonoma County Residents' Vision of the Components of a Successful Cannabis Program***

#### **Overview of Vision Sessions' Content and Methodology for Obtaining Community Input**

On June 8, 2021, the Sonoma County Board of Supervisors directed staff to complete a comprehensive update of the cannabis program, based on community input and an Environmental Impact Report to comply with the California Environmental Quality Act (CEQA). As a first step in this three-year process to update the cannabis program and ensure compliance with CEQA, staff from Permit Sonoma and the County Administrator's Office collaborated with an independent contractor to conduct a series of community Visioning Sessions, August 9-12, 2021. The purpose of the visioning sessions was to ask community members to identify the content of a successful cannabis program. The visioning session topics focused on the four most significant aspects of how a cannabis program impacts the community: land use, safety, water considerations, and visual aspects. The County conducted eight 90-minute sessions, with two identical sessions conducted on each of the four targeted topics to accommodate community members' schedules.

The virtual visioning sessions were conducted on the Zoom platform. Staff from public agencies briefly introduced key components of a cannabis program, provided in PowerPoint, for the public to consider. After each brief staff comment, the facilitators moderated public written comment provided via the Q & A Zoom feature and email. Two Spanish interpreters provided interpretation in each session.

The purpose of these sessions was not to build consensus, but to identify the wide range of opinions that Sonoma County residents have regarding their vision for the future of the County's cannabis program. Community members were asked to provide their thoughts about the following broad-based, vision-focused topics related to a successful cannabis program in Sonoma County:

#### **Land Use**

1. What are the qualities and characteristics of places that wouldn't be a good fit for growing cannabis? What are the qualities and characteristics of places that would be a good fit for growing cannabis?
2. What would an appropriately sized cannabis growing operation look like in a rural setting? What would an appropriately sized cannabis growing operation look like in an industrial setting? What characteristics would make an operation too big?
3. What would a successful distribution of cannabis operations look like? What would too many cannabis operations look like?
4. What would a successful growing operation do to control odor?
5. What would a successful ordinance contain to address any noise produced throughout the cannabis supply chain?

6. What does successful accountability look like when it comes to land use and cannabis? What would it mean to hold retail operations accountable? What would it mean to hold cannabis growers accountable?

### **Safety**

1. What would safe cultivation look like when it comes to emergencies like wildfire? What characteristics would make cultivation unsafe in an emergency?
2. What would a safe and secure cannabis growing operation look like in a successful cannabis program? What would a safe and secure retail establishment look like in a successful cannabis program?
3. If the State allows onsite/social consumption, what should be the most important things we prioritize when thinking about what should be allowed? If it is allowed, what would be an ideal site for onsite consumption?
4. What does successful accountability look like when it comes to safety and cannabis? What would it mean to hold retail operations accountable? What would it mean to hold cannabis growers accountable?

### **Water Considerations**

1. What do you think are the most important water resources that we need to protect as we develop the guidelines for the cannabis program? What would a successful cannabis operation look like that protects our water resources?
2. What would successfully protecting natural habitats and species look like when it comes to cannabis cultivation? What would successfully protecting riparian corridors look like when it comes to cannabis cultivation?
3. What would successful water conservation efforts for cannabis cultivation look like in normal years?
4. What would a successful approach to a drought look like for cannabis cultivation in the county?
5. What does successful accountability look like when it comes to water and cannabis? What would it mean to hold cannabis growers accountable?

### **Visual Aspects**

1. What do you value about the look and feel of Sonoma County that we should be protecting when considering where cannabis cultivation is located?
2. What are the types of places where cannabis cultivation should be allowed because it wouldn't impact the visual beauty of our county? What are the characteristics of the types of places where cannabis cultivation wouldn't be a good fit?
3. What would cannabis cultivation operations look like in a successful cannabis program?
4. What does successfully separating cannabis cultivation operations visually from the surrounding area look like? What would a cultivation site that isn't separated well look like?
5. In a successful cannabis program, what would be the visual appearance of anything related to the cannabis supply chain?
6. What kind of lighting would there be in a successful cannabis program?
7. What does successful accountability look like when it comes to the visual aspects of the cannabis program? What would it mean to hold cannabis growers and retailers accountable?

## Overview of Community Participation in the Visioning Sessions

The visioning sessions generated a total of 2,532 comments. There were 602 registrations for the sessions, with 442 attending. Several individuals attended multiple sessions, resulting in a total of 210 unique participants. Please see the following chart for attendance detail:

Sonoma County Visioning Sessions: Community Participation, August 9-12, 2021					
Date	Topic	Time	Registered	Attended	Questions
8/9/2021	Land Use	11:30 AM	114	94	457
8/9/2021	Land Use	5:30 PM	74	46	231
8/10/2021	Safety	11:30 AM	80	60	343
8/10/2021	Safety	5:30 PM	71	49	367
8/11/2021	Water	11:30 AM	86	73	409
8/11/2021	Water	5:30 PM	58	38	198
8/12/2021	Visual	11:30 AM	64	50	315
8/12/2021	Visual	5:30 PM	55	32	212
<b>Total: 210 Unique Participants</b>			<b>602</b>	<b>442</b>	<b>2,532</b>

Participants in the visioning sessions were encouraged to send their comments via email to the Cannabis Program at [cannabis@sonoma-county.org](mailto:cannabis@sonoma-county.org). Between July 23 and August 15, 2021, the Cannabis Program received 251 emails from constituents expressing their opinions about the future of Sonoma County's cannabis program. This summary report includes findings from these emails.

## Overview of Community Outreach for the Visioning Sessions

Staff from the County's Cannabis Program and Permit Sonoma promoted the visioning sessions through the following channels:

- Posting on the Cannabis Program website
- 4 emails sent to the 2,179 addresses from the Cannabis Program distribution list
- 4 tweets in English and Spanish
- 3 Facebook posts in English and Spanish
- Article in the Sonoma Index-Tribune
- Article in the SoCo News

## Overview of Community Comments

This report contains a summary of participant comments from all eight visioning sessions conducted August 9-12, 2021, and emails received by the Sonoma County Cannabis Program between July 23 and August 15, 2021. Comments in this report have been edited for brevity and clarity.

## Land Use

### A. Location for growing cannabis

1. Various participants oppose growing cannabis in the following locations:
  - Class 3 or 4 groundwater availability areas or impaired watersheds.
  - High or very high Wildland Fire Hazard Zones or areas with limited road access.
  - Designated scenic areas, protected areas (parks, riparian, bike paths), or scenic viewsheds.
  - Residential areas – including RRD
  - Community Exclusion Zones or Community Separators

- Areas with slow first responder responses
  - on slopes over 15%
  - on dead-end roads over one mile long, less than 20 feet wide, or have evacuation challenges
  - near schools, playgrounds, or daycares.
  - Bennett, Sonoma, and Franz Valleys, as well as Bloomfield.
2. Various participants approve growing cannabis in the following locations:
    - Only in industrial areas, including near Sonoma County Airport
    - Only in industrial and commercial areas in incorporated areas
    - in areas zoned for agriculture, aligned with vineyards, hemp, and other ag
  3. Many participants agree that there should be 1,000-foot setbacks across the across the board.
  4. Some believe that neighborhood compatibility should be prioritized and examined because cannabis is not a “one size fits all” industry.

**B. Size of cannabis growing operations**

1. Some participants believe there should be no restriction in sizes, while others believe there should be restrictions, ranging from 1 acre to 20 acres or more.
2. A group believes that the County should evaluate each site individually based on neighborhood compatibility.
3. Industry participants agree that the County should align size measurements with the State and hemp and use canopy as the measurement.
4. Other participants agree that size should be based on specific percentage of parcel, ranging from 10% to 25%.

**C. Concentration of cannabis growing operations**

1. Many participants believe that operations should be clustered in industrial areas. In contrast, some participants oppose clustering anywhere, especially in rural areas.
2. Again, some participants believe there should be a limit number of operations (including retail) countywide. Some suggest limiting the number of operations (in entire supply chain) based on distance (i.e., only X number of dispensaries in a 5-mile radius)
3. Some participants agree that there should be only one LLC or tenant per location/permit.
4. A small group believes that there should be a cap on retail operations in the County, including keeping it at nine. In contrast, another group believes that the market will correct itself and there will be less threat of crime with more access.

**D. Odor**

1. Many participants agree that odor should stop at property line and agree that setbacks should be same as pig farms (500 ft).
2. To evade odor, many also believe that outdoor grows should be 1 mile setback from residences.
3. Some suggest using hoop houses and/or greenhouses with filtration.
4. Others agreed with the suggestion that permitting should include examination of wind patterns and intensity for each site.
5. Some participants believe cannabis odor requirements should be the same as hemp and that there should be no special requirements due to cannabis being an agricultural product.

**E. Noise**

1. Out of concerns for noise, some participants believe there should be no processing, retail, or events on agricultural land.

2. Some participants agreed that equipment should have decibel requirements.
3. Others believe that the County should use the noise ordinance presented in the General Plan.

#### **F. Accountability related to land use**

1. Many participants believe the County needs to improve overall enforcement and response, a suggestion made throughout the Visioning Sessions. Some participants suggested that the County should utilize cannabis tax funds to expand and improve enforcement operations.
2. Some suggested that the County needs to provide more oversight in handling illegal operations, including response times.
3. Many also agreed that there should be full transparency on permitting, complaints and status on website.
4. A handful of participants agrees that the County should continue regular inspections, including without notice. In contrast, others do not want more inspections – cannabis is already inspected by six agencies. Both trends appear throughout the report.
5. Some participants believe that facilities should be required to have a bond to assist with removal of equipment.
6. Others believe complainants should be fined for reporting false or harassing complaints about complying operations.
7. Reflecting a trend throughout the report, some participants believe the community must stop treating cannabis operators like criminals and treat them like other agriculture to stop the black market.
8. Some participants agree that the County needs more staff members for accountability. This was supported by at least a handful of participants in each Visioning Session, regardless of the topic.

#### **G. Additional land use comments**

1. A group of participants believes the County should adopt a moratorium until the EIR is completed and the ordinance is approved. A small group made this request throughout all meetings.
2. In contrast, others believe that permitting should continue. This is also reflected in most meetings by a small group.
3. A small group also agrees that the County should not adopt an ordinance and not allow cannabis in the County.
4. Consensus among those comfortable with cannabis farming in the County is that permitting should be for ministerial only.
5. Many agree that the County should limit development of any industry, housing, etc., if roads, water, and fire prevention cannot support it. Do not just target cannabis.
6. Some believe that cannabis should be treated the same as other agricultural products – a trend that appears in every Visioning Session.

### **Safety Concerns**

#### **H. Safe cultivation practices for emergency preparedness**

1. There are concerns about emergency access along narrow roads, which might not be deemed “fire safe.” A group of participants wants roads to be evaluated for first responder access, evacuation ease, and quality to determine if they are safe enough to allow cultivation sites.
2. Additionally, others support requiring emergency and evacuation plans, which are approved by the County.

3. Some participants want to see cultivation only located in areas where first responders can respond within 5 to 15 minutes.
4. Another group wants cannabis to be treated/categorized like other agriculture, including when it comes to fire, seismic, accessibility, and other concerns.
5. A group supported the County incentivizing or encouraging cultivators to participate in fire safety, preparedness, and mitigation both onsite and through community engagement.
6. Cultivators want County safety guidelines to align with those already implemented by the State.

**I. Safe and secure cannabis cultivation and retail operations**

1. A handful of participants supported various ideas of clustering. Some want to see clustering of numerous cultivators on large parcels to condense security and risk. In contrast, others wish to see clustering only in industrial areas with security.
2. Self-proclaimed cultivators want their farms to be allowed to operate and look just like other farms.
3. Cultivators also requested more exceptions and allowances for security, including higher fencing and their choice of armed or non-armed guards, for example.
4. A group expressed concern about the County publishing a list of licensed cultivators online. They are worried this could lead to an increase in criminal activity.
5. Some participants wish to see safety and security requirements aligned with the State requirements.
6. A handful of participants agreed that background checks for all employees is ideal for safety and security.
7. Participants across all spectrums agreed that permitting should be given only to residents of Sonoma County.

**J. On-site/social cannabis consumption**

1. A group of participants agreed that events should only be allowed in commercial or industrial zones.
2. A handful of participants do not want onsite consumption at all. Additionally, other participants shared they would approve of tasting rooms once a cannabis-style “DUI” test is available for use.
3. Another group agreed that the County should allow consumption lounges, if legalized.
4. A small group also agreed that consumption lounges should not be allowed in rural areas due to road safety.
5. Another group wants farms to offer tastings and events aligned with wine and other agriculture.
6. A group of participants expressed a desire to see a medical consumption lounge opened for Section 8 Housing residents to safely consume.

**K. Accountability related to safety**

1. Some participants believe that there is already enough oversight from the five State and local agencies that oversee cultivators and that more oversight is not needed.
2. Cultivators also suggested a “neighborhood watch” program but expressed concern that the program might not work unless they remain marginalized.
3. There is a contrast in opinions regarding the idea of incentivizing legal cannabis companies to turn in illegal cannabis companies. A handful of participants agreed, believing it would take the burden off neighbors filing reports. In contrast, a handful disagreed, believing it would further decrease community relationships.

4. A handful of participants believes that complainants should be fined if their complaints are discovered to be falsified.
5. A small group would like the County to begin educating the public, including neighborhood groups, about cannabis ordinance and law in the County to curb misinformation and build trust. This may also include tours at facilities for the public.
6. A group of participants wants to see increased transparency from the County about cannabis complaints, the status, and the results. Publish it online.

**L. Additional safety comments**

1. As seen in the prior section, a group of participants believes the County should adopt a moratorium until the EIR is completed and the ordinance is approved.
2. A group of participants wants the County to support State legislation loosening banking regulations for cannabis.
3. Participants want to see the EIR examine various subjects, with the most supported being (1) the impact of cannabis cultivation on fire safety/mitigation; (2) how the reduction of cultivators has impacted safety; (3) how licensed businesses gaining access to banking, and eliminating cash onsite, has impacted safety; and (4) how alcohol land use and consumption is regulated and allow cannabis the same permissions.

## Water Considerations

**M. Protection of water resources**

1. As reported in the land use meetings, a handful of participants agrees that any cannabis operations should be prohibited in water zones 3 and 4.
2. There is consensus that sensitive water resources should be protected, including impaired watersheds, ponds, rivers, streams, creeks, springs/artisan wells, etc.
3. Select community members also agree that residential areas that rely on wells for everyday use should be protected out of worry of overdraft and reduced water recharge.
4. A handful of participants believes the EIR must examine water tables, drinking water, watersheds, and fish habitats.
5. Some participants do not want new wells approved in the foreseeable future due to the drought, except for replacing dry wells. This should be across the County, regardless of industry or type.

**N. Protection of natural habitats and riparian corridors**

1. There is consensus that already sensitive watersheds should be protected.
2. A small group of participants conflicts on where cannabis should be grown to save water and protect sensitive areas. A few believe it should only be grown indoors to protect sensitive areas and riparian corridors. In contrast, others disagree, believing cannabis should be grown outdoors to be more water efficient and ecologically friendly.
3. There is a consensus among a small group of participants that the County needs to include an updated analysis of these areas in the EIR and continue regular monitoring, including animal counts.
4. A handful of participants all agreed that cannabis policy and procedures should be the same as other agriculture regarding sensitive areas and riparian corridors.
5. As seen in prior discussions, a group of participants agrees that there are plenty of requirements already in place and that the County's ordinance should mirror State laws.

#### **O. Water conservation and drought**

1. Many participants, on all sides of the spectrum, agree that dry farming would be beneficial. The County should either require or at least, incentivize it – including for other ag crops like grapes.
2. A handful of participants agrees that the County should incentivize and promote water catchment systems for farms. In contrast, a small group opposes water catchment systems out of concern with the process possibly depleting groundwater flow.
3. Many participants agreed that the EIR should study rainwater catchment reservoirs/ponds and determine if they interfere with groundwater recharge of the aquifers and/or downstream flow. This study could also determine how many can be built if agreeable with future health of watersheds.
4. Some participants agreed that requiring or incentivizing drip systems would help conserve water.
5. There are conflicting opinions about requiring or incentivizing dry farming – some participants oppose it. The only rationale provided was that it is too expensive. In contrast, more than a handful of participants supports dry farming.
6. While there were disagreements between dry farming and water catchment opinions, many agreed that incentivizing farmers to implement water-saving practices is important, such as in-ground planting, mulching, cover crop, drip systems, and more.
7. A small group of participants agreed that greenhouses or hoop houses are more water efficient and should be allowed, required, or incentivized.
8. Some participants opposed trucking in water during droughts out of concern of where the water is from and conservation during drought. There was also concern about trucking in recycled water and if aquifers could be contaminated. In contrast, others support the concept, citing those other agricultural industries are allowed to do so during drought.
9. A handful of participants agreed that cannabis – and other agriculture – should be required to reduce their water use, or lose their water rights, during drought years, as necessary.
10. A group of participants supports the concept of having test farms (including those currently permitting) to monitor and collect data, build trust between the public and operators, offer public education and more. This could help inform the EIR.

#### **P. Accountability related to water**

1. Additionally, some participants expressed concern about self-reporting of water usage by operations. Recommendations include regular monitoring by the County and fines or cease & desist for operations that overuse or cause their neighbor's wells to fall/fail.
2. Select participants agree that the County needs to ensure each permit review process includes a hydrology report about water use and availability, and the potential impact the operation would have on water resources.
3. A handful of participants believes that permits should only be for one year to allow for the County to regularly assess water use and availability more accurately.
4. A small group of participants expressed a lack of trust about self-reporting water usage by cannabis operations.
5. Some participants agree that the County should revoke permits for violations.
6. A small group of participants believes that the County should use smart meters to monitor water use at operations to avoid self-reporting.



#### **Q. Additional water comments**

1. There was a consensus among many participants that the current, available water data for the County is outdated and that the EIR should include updated water condition data and usage.
2. Many participants support the concept of not allowing out-of-county landowners to be permitted for cannabis operations. This was the most supported comment/idea in the water sessions.
3. A group of participants, as seen in prior meetings, wants a moratorium on the permitting process until an EIR is complete.
4. Some participants do not want cannabis to be grown at all due to concerns around water use and the existing drought.
5. A small group also agreed that the EIR should include updated water-related data for the County, such as water tables, drinking water, watersheds, etc.
6. We continue to see some participants requesting that the County re-examine all water-related criteria for all agriculture, including cannabis, and development. They believe cannabis should be treated equally to other agriculture and that ordinances for all agriculture are outdated.

### **Visual Aspects**

#### **R. Protecting Sonoma County's natural beauty**

1. There is a general belief among some participants that the following areas should be protected from cannabis operations: Community Separators, parks, lands protected by the Open Space District, the four categories of visual resources identified in the County's General Plan, and additional greenbelts.
2. There were, as stressed in prior meetings, concerns beyond natural beauty. Some participants do not want cannabis to be visible or near schools or residential areas.
3. Many participants, as seen in previous meetings, expressed that cannabis cultivation should be conducted only in industrial or commercial areas to avoid visual impact in the County.
4. Some participants believe that cannabis should be allowed to grow anywhere other crops are allowed, including hemp and grapes.
5. Many participants expressed that cannabis cultivation should be on a small scale to protect Sonoma County's rural character.
6. As stated in the Land Use session, some participants do not want operations of any kind to be visible from scenic roads, parks, or public right of ways.
7. *Please Land Use (#1) and Water (#13) for additional comments.*

#### **S. Separating cannabis cultivation from the surrounding area**

1. A handful of participants believes that all components of a cultivation site need to be screened from public roadways.
2. Many participants suggested providing natural screening with plants.
3. Some participants expressed that screening isn't necessary.
4. Others suggest that hoop houses help screen the plants and add additional security, given that vegetables and other products are farmed in them. Hoop houses can also be screened by additional fencing, plants, and natural barriers.
5. While some participants expressed that they do not want to see any visual aspects of cannabis grows, others stated that cannabis should not be required to be screened/separated just like hemp, vineyards, and other agriculture.

6. A handful of participants expressed concern about the visual appearance of security fencing and equipment. One participant called it “jarring” and “ugly” and others asked for it not to be allowed in rural areas.

#### **T. Visual appearance of cannabis operations**

1. Many participants agreed that small operations should be prioritized, or the only types allowed.
2. Some suggested that if cannabis cultivation blended in with the landscape there would be less community pushback.
3. There was extensive concern that hoop houses are visually unappealing.
4. Some participants suggested that greenhouses could be an alternative to hoop houses.
5. Members of the cultivation community expressed that hoop houses protect crop quality from neighboring agricultural use spray-drift. Cultivators should be allowed to protect their crops with hoop houses because cannabis is subject to very stringent testing requirements, and any pesticides residues could cause failed testing and destruction of product.
6. Additionally, many participants agreed that sustainable practices could benefit the look of cannabis operations, including companion gardening, renewable energy, biodynamic practices, sun-grown, and more.
7. As seen in previous discussions, some participants believe that cannabis operations should only be in industrial or commercial areas.

#### **U. Lighting**

1. Many participants expressed requiring “dark sky” standards for any lighting to appreciate the natural beauty of the nighttime sky and protect animals.
2. While some participants preferred that no lighting be allowed in hoop houses, others suggested allowing the use of minimal lighting, per State guidelines.
3. Some participants believe that cannabis operations should only be in industrial or commercial areas due to the lighting.
4. Other participants suggested incentivizing or requiring eco-friendly lighting practices.
5. Additionally, some participants suggested that covers be placed over hoop house to protect light from escaping the houses.

#### **V. Accountability related to visual aspects**

1. Many participants would like to have a specific County phone number and email address for reporting violations.
2. As reported in previous sessions, several participants agreed that the existing system of permitting, licensing, inspections, and enforcement is more than stringent enough and should be maintained.
3. Some participants believe the County should hold cannabis operations to the same visual standards as other agriculture industries and companies.
4. Additionally, the visual sessions included participants agreeing that code enforcement could be improved and needs more transparency.

#### **W. Additional visual comments**

1. Many participants don’t want to see industrial scaled cannabis in Sonoma County. They add that the original intention of the cannabis program was to bring legacy farmers into compliance, not to invite an industrial-scaled cannabis industry into the County.
2. As seen previously, some participants want cannabis to be treated like other agriculture.

## Summary of Comments

LAND USE	
Topics	Page Number
A. Location for growing cannabis	12
B. Size of cannabis growing operations	16
C. Concentration of cannabis growing operations	17
D. Odor	18
E. Noise	19
F. Accountability related to land use	20
G. Additional land use comments	22
SAFETY CONCERNS	
Topics	Page Number
H. Safe cultivation practices for emergency preparedness	23
I. Safe and secure cannabis cultivation and retail operations	25
J. On-site/social cannabis consumption	27
K. Accountability related to safety	28
L. Additional safety comments	29
WATER CONSIDERATIONS	
Topics	Page Number
M. Protection of water resources	31
N. Protection of natural habitats and riparian corridors	32
O. Water conservation and drought	34
P. Accountability related to water	36
Q. Additional water comments	37
VISUAL ASPECTS	
Topics	Page Number
R. Protecting Sonoma County's natural beauty	38
S. Separating cannabis cultivation from the surrounding area	39
T. Visual appearance of cannabis operations	40
U. Lighting	41
V. Accountability related to visual aspects	42
W. Additional visual comments	42

**A. Location for growing cannabis**

1. Do not allow farms or production facilities in Class 3 or 4 groundwater availability areas. *(Multiple participants made or supported this comment.)*
2. Do not allow farms or production facilities in impaired or protected watersheds. *(Multiple participants made or supported this comment.)*
3. Do not allow in high or very high Wildland Fire Hazard Zones. *(Multiple participants made or supported this comment.)*
4. Do not allow cultivation to be visible from scenic roads, hillsides, trails, parks, or public right of ways. *(Multiple participants made or supported this comment.)*
5. Do not allow in neighborhoods or residential areas. *(Multiple participants made or supported this comment.)*
6. Do not allow near schools or day cares. *(Multiple participants made or supported this comment.)*
7. Do not allow on dead-end roads over one mile long, less than 20 feet wide, or have evacuation challenges. *(Multiple participants made or supported this comment.)*
8. Do not allow in Resources and Rural Development Districts (RRD). *(Multiple participants made or supported this comment.)*
9. Do not allow in Community Exclusion Zones. *(Multiple participants made or supported this comment.)*
10. Do not allow cultivation in Community Separators. *(Multiple participants made or supported this comment.)*
11. Do not allow near oak woodlands or heavy forests. *(Multiple participants made or supported this comment.)*
12. Do not allow in areas with Sheriff or first responder response time is inadequate (i.e., 20 minutes). *(Multiple participants made or supported this comment.)*
13. Do not allow in riparian corridors. *(Multiple participants made or supported this comment.)*
14. Do not allow in Bennett Valley. *(Multiple participants made or supported this comment.)*
15. Do not allow in Bloomfield. *(Multiple participants made or supported this comment.)*
16. Do not allow on slopes over 15%. *(Multiple participants made or supported this comment.)*
17. Neighborhood compatibility must be a priority, including, but not limited to, sound, odor, water use, public view, and public safety. *(Multiple participants made or supported this comment.)*
18. Setbacks from residential communities and hamlets or to adjacent Rural Residential or Agricultural Residential parcels in unincorporated areas must be increased to preserve the integrity of the community.
19. No outdoor growing operations within one mile of a residential community of five homes or more.
20. Do not allow near residential, including other living facilities (i.e., assisted living).
21. Do not allow within 250-500 ft. from a home, schools, or other sensitive areas.
22. Do not allow within 300 ft. from a home.
23. Do not allow within 1,000 ft. of homes.
24. Do not allow within 2,650 ft. of homes.
25. Do not allow within 5,000 ft. of public spaces, including parks, playgrounds, or other areas where people gather or walk/hike/run.
26. Do not allow near homes regardless of zoning.

27. Do not allow on private shared roads unless there is written consent from all shared parcel owners.
28. Don't allow cannabis to be grown in prime soil.
29. Do not allow in areas adjacent to unincorporated towns.
30. Do not allow in traditional agriculture areas because it is a drug.
31. Do not allow in agricultural properties with water concerns that are close to residential property.
32. Do not allow in water zone 2 without EIR.
33. Do not allow in areas where local farmers who grow food will be displaced.
34. Do not allow in vineyard areas. There are already water issues, and they are too close to residents who use wells.
35. Do not allow it at archeological sites.
36. Do not allow the use of existing permanent structures for indoor cultivation in proximity to rural residential uses.
37. Do not allow retail near schools, parks, or homes.
38. Do not allow in Franz Valley or on Franz Valley School Rd.
39. Do not allow near wildlife corridors.
40. Do not allow near vernal wetlands.
41. Do not allow in West County.
42. Do not allow in areas where water must be trucked in.
43. Do not allow in areas where catchment ponds will hamper groundwater replenishment.
44. Do not allow in areas where there is a concentration of other cannabis operations.
45. Do not allow where overconcentration would be the result unless the area is a designated inclusion zone.
46. Do not allow any tasting rooms in the County.
47. Do not allow any farm that offers retail to be near or on residential roads.
48. Do not allow in R1, R2 and R3. Open the other zones, including LIA, RR and AR. Maximum lot size should not matter if you can make the State setbacks.
49. Options regarding residential easements: (1) do not allow new easements; (2) allow current applicants to continue; (3) grant temporary access with grading permits (or other applicable permits) to install driveway, while work is being done; or (4) require signed agreements with neighbors, renewed at the time of permit renewals. This may require maintenance expenses, to be determined between both parties signing the easement agreement.
50. Create Cannabis Inclusion and Exclusion Zones where facilities can be located. *(Multiple participants made or supported this comment.)*
51. Allow facilities in industrial areas only. *(Multiple participants made or supported this comment.)*
52. Allow facilities only in industrial areas by the airport. *(Multiple participants made or supported this comment.)*
53. All processing and transport/distribution must be in industrial areas only. *(Multiple participants made or supported this comment.)*
54. Require a 1,000 ft. setback for all cannabis facilities from neighboring parcels. *(Multiple participants made or supported this comment.)*
55. Processing, manufacturing, and dispensing along with any canni-tourism should be in commercial and industrial zones in incorporated areas only. *(Multiple participants made or supported this comment.)*

56. Allow it in areas zoned for agriculture. (*Multiple participants made or supported this comment.*)
57. Allow anywhere you can grow grapes and other agriculture. Cannabis is agriculture. (*Multiple participants made or supported this comment.*)
58. Allow retail only in cities. (*Multiple participants made or supported this comment.*)
59. Allow in LEA, LIA, and DA zones for ministerial permits. (*Multiple participants made or supported this comment.*)
60. Allow in LEA, LIA, and DA zones on parcels 10 acres or greater. (*Multiple participants made or supported this comment.*)
61. Allow in LEA, LIA and DA zones.
62. Allow distribution in AG zones with, at most, an MUP.
63. Allow small scale cultivation on appropriate AR + RR parcels over 10 acres with a CUP.
64. Allow it to be in all zones.
65. Allow it in all zones except residential.
66. Allow cottage cultivation in AR/RR zones.
67. Allow on-farm light manufacturing.
68. Allow grows in M1, M2, and M3.
69. Allow retail at the airport.
70. Allow retail in more trafficked and well-established areas.
71. Allow cottage grows in AR zones. People can currently grow small vineyards in AR zones.
72. Allow rooftop hoop houses in industrial areas with processing in the building below.
73. Allow greenhouses in industrial areas.
74. Allow cultivation in water zones 1 or 2.
75. Allow tasting rooms only in the LIA zone.
76. Allow in southwest Santa Rosa – that area is much more open and has less neighborhoods to be impacted.
77. Allow it to be anywhere hemp is grown. Same plant, same standards.
78. Allow in Zones 3 and 4 because they have unique terroirs and good quality water.
79. Allow in Zone 3 and 4 on case-by-case basis. Zone 4, for example, has lots of water in many areas.
80. Allow for sun grown cannabis while requiring distribution to be in commercial or industrial zones.
81. Allow for outdoor grows with no cover and 5,000 ft. from RR.
82. Allow on thousands of open acres not near non-RA and non-AG neighborhoods.
83. Allow within 300' of residential structures.
84. Allow with at least 1,000 ft setback from residences and along fire safe roads (see operations on Western and Gericke as examples).
85. Allow in areas with 1,000 ft setback from all sensitive use areas, including residential and biotic resources.
86. Allow cannabis to be grown at least one mile from schools and parks.
87. Allow outdoor cultivation only in agricultural zones.
88. Allow it to be in “true ag” zones or industrial areas far away from people.
89. Allow farmers and ranchers to set up operations further away from public view in unused space on their properties.
90. Allow retail operations at farms.
91. Allow grows to be in agricultural zones and have post-grow facilities in industrial zones.
92. Allow it in current agricultural zones with sufficient water resources.

93. Allow it to be grown within vineyards, farms, and all ag-land parcels where people are already farming grapes and livestock.
94. Allow indoor and greenhouses with setbacks that provide adequate protection from odor and visual impairment from residential communities and hamlets.
95. Allow indoor and greenhouses only if adequate power supply and wastewater disposal capacity is demonstrated.
96. Allow wholesale in DA, LEA, and LA.
97. Allow people to grow in their backyards with no limit in acreage because indoor grows are environmentally unsustainable.
98. Allow people to plant right up to their property lines.
99. Allow in fire zones – Cannabis is no more dangerous than vineyards.
100. Allow it to be grown wherever hemp is grown unless water scarcity indicates otherwise.
101. Allow near creeks with over 100 feet plus setbacks.
102. Allow cottage licenses in the outskirts of community growth boundaries.
103. Develop regulations that allow for Type-7 manufacturing with a CUP.
104. Only allow operations within 100-acre parcels that are adjacent to five homes or less.
105. Only on agricultural zoned land that is already “prepped” for agriculture, so the project does not require massive alteration of the landscape.
106. Only allow sun grown cannabis to minimize plastic and pollution from hoop houses.
107. I would really love to see cannabis integrated into a poly culture farm with a diversity of species growing together.
108. Incentivize outdoor cultivation in all rural zones – indoor/industrial cultivation is not environmentally sustainable.
109. Cannabis is a plant and should be allowed to be grown outside. We are in a climate emergency. We should not be pushing all growing to indoor spaces. Some is fine, but the sun does the job without need for energy use.
110. Cannabis belongs in all rural zones. The smallest legacy cultivators have had no pathway to permits because many of them are in AR and RR zoning classifications. With appropriate parcel size, these farmers should be able to permit a cottage sized farm through a variance process.
111. West of Santa Rosa where wastewater is used for irrigation. Large parcels well removed from residences.
112. Provide waivers for cannabis grows that have community approval.
113. Create a variance process to create a pathway for appropriate parcels in all rural zones.
114. Require indoor and greenhouse (mixed light) facilities to be in 10,000 square foot warehouses.
115. The County should evaluate every parcel in unincorporated County for suitability for cannabis cultivation (including water, fire danger, road safety, GP & zoning compliance), power, waste disposal, etc.
116. The County should research if a larger setback is required from vineyards. 100' might not be enough.
117. The proposed siting of these operations should include a projection of 20 years into the future of where natural growth will occur and what kind of resource demands will be needed to meet that growth.
118. Government document submitted for County review: The findings from San Joaquin County to ban commercial cannabis: <https://www.counties.org/sites/main/files/file->

## **B. Size of cannabis growing operations**

1. Do not have a minimum for parcels – it will exclude (younger and less affluent) people from getting into the industry. Very few people of color own parcels of 10 acres or more in Sonoma County. (*Multiple participants made or supported this comment.*)
2. Limit operations to 10,000 square ft. per current ordinance. (*Multiple participants made or supported this comment.*)
3. The size of the outdoor grow should be relative to the proximity to rural residents, available water, adherence to the North Bay Air Quality Control guidelines for safe air quality. (*Multiple participants made or supported this comment.*)
4. 10% of 100 acres would pay nearly \$1,000,000 in local taxes to the County each year that could go toward community development and education. (*Multiple participants made or supported this comment.*)
5. Size measurements should align with State licensing and be measured by canopy square footage with no limit to immature plant area. (*Multiple participants made or supported this comment.*)
6. Any size is too big. They use up more water than Sonoma County can afford to use.
7. Outdoor grows should be less than an acre each.
8. Outdoor grows should be limited to one acre. (*Multiple participants made or supported this comment.*)
9. Maximum size should be 10% to 20% of parcel. (*Multiple participants made or supported this comment.*)
10. 10% rule if over 100 acres large. 20 percent if under 100 acres.
11. Maximum size should be 10% to 25% of parcel.
12. An acre cap per parcel is too low. (*Multiple participants made or supported this comment.*)
13. Must be located on parcels of 20 acres or more. (*Multiple participants made or supported this comment.*)
14. Allow on 20 acres or less. If you do not, it excludes small family farmers and invites large scale and out of County residents.
15. Do not limit ownership to one acre of canopy.
16. Must be located on parcels of 5 acres or more; this will benefit smaller growers.
17. Must be located on parcels of 10 acres or more.
18. Reduce the 10-acre minimum parcel size for small-scale operations.
19. Require cottage licenses of 25 plants or 2,500 sq. ft.
20. Require initial studies at 10,000 sq. ft.
21. Require EIR for 2 acres or more.
22. Require large scale, commercial cannabis operations to go through the normal vetting process. Don't rely on the "ministerial" process.
23. Ag zones: parcels of 10 acres or more where odor can be stopped at property line.
24. Ag zones: properties should have a minimum of 2,500 sq ft. for cottage licenses.
25. Ag zones: outdoors should be related to lot size with 1 acre allowed per 20 acres of land.
26. Ag zones: For outdoor and greenhouse there shouldn't be a limit. There isn't for grapes, but setbacks between gardens is reasonable.
27. Ag and rural zones: allow 10,000 sq. ft. greenhouses on 2-acre parcels or 10% of parcel size on larger parcels



28. Allow full utilization of industrial buildings by removing 22,000 square foot parcel cultivation area limit for indoor cannabis cultivation in industrial zones when project will occur within a building (MP, M1, M2, M3).
29. Maintain consistency between State and local methods for measuring “cultivation area” (areas that will contain mature plants).
30. Align with State requirements and do not limit vegetative and propagative areas.
31. Base acreage on appellation of origin.
32. Maximum size would be basketball court: 1/4 acre allowed per 10 acre of land no matter how many owners are involved.
33. Small scale cultivation/craft cultivation can work without providing a nuisance in RR zones. 50-99 plants should be allowed in most zones.
34. Only allow ministerial permits.
35. Only allow small “mom and pop” operations with 1 acre limit cultivation.
36. Do not allow ministerial permits.
37. Indoor grows with greenhouses at 1/10<sup>th</sup> acre and canopy the total sq. ft. in tiered grows.
38. Lower acreage requirements for cottage licenses and make it exempt from EIR.
39. Mirror State regulations to allow for more propagation area.
40. Allow indoor grows to be larger than outdoor grows.
41. Cannabis measurements in the County should mirror State requirements and eventual federal requirements. There is no limit on hemp, grapes, and other ag commodities, except for slope, water availability and other specific restrictions. This ordinance should be prepared for 2023 when the State allows large outdoor licenses.
42. There should be a restriction on the number of people allowed to work at operations.
43. Canopy taxes are a waste of the County's manpower and resources to measure each year. Tax should be like on other ag crops and be based upon the annual yield/production totals which are easily obtained through the State.
44. Cannabis setbacks should equal hemp setbacks.
45. Consider nurseries separately from other cultivation types and do not aggregate square footage.
46. Ensure that indoor cultivation in industrial zones is considered separately from requirements applied to cultivation in ag and resource zoning. Examples that should be avoided for indoor cultivation in industrial zones are minimum parcel size, basing allowable cultivation square footage as a percentage of total parcel size, and property line setbacks.
47. Setbacks should start at the property line, not buildings/grows.
48. Size should be limited by the odor it produces so that neighbors don't have to smell the terpenes.
49. With the land use requirements proposed there is not more than 3000 permissible acres in the County. There is not a need to limit acreage caps in the County beyond the land use requirements already proposed.
50. Sonoma County has 50,000 acres of vines. A 1 percent rule would be reasonable: 500 acres of cannabis.

### **C. Concentration of cannabis growing operations**

1. Clustering could be in pre-determined inclusion zones, especially for indoor. *(Multiple participants made or supported this comment.)*
2. Allow operations to cluster in industrial areas. *(Multiple participants made or supported this comment.)*

3. Allow only a limited number of operations (of any type in the supply chain), all concentrated in industrial areas. *(Multiple participants made or supported this comment.)*
4. Only allow one LLC or tenant per permit or property. *(Multiple participants made or supported this comment.)*
5. Allow a certain number of grows within an area, i.e., have a one acre grow, maybe no others within 4 square miles or only certain amount in block. *(Multiple participants made or supported this comment.)*
6. Do not allow clustering of equipment like hoop houses in rural areas. *(Multiple participants made or supported this comment.)*
7. There should be a cap on retail. *(Multiple participants made or supported this comment.)*
8. There should not be a cap on retail operations. The market will correct. Without easy access to retail the illicit market steps in. *(Multiple participants made or supported this comment.)*
9. Cluster of 10,000 sq. ft. plots, regarded as a single entity, and permitted accordingly. It would be ineligible for ministerial permitting and require CUP with public notices and EIR.
10. The County should identify large tracks of land away from rural residences, forests, and parks, that are accessed by fire safe roads that can be subdivided into lots for purchase by cannabis growers.
11. Put a cap on permits or acreage by watershed - water availability will be impacted by concentrated uses.
12. Cultivation concentration needs to be developed by the cannabis farming community and based around appellations. With a focus on small farmers and environmentally friendly farming techniques.
13. Only allow cultivation sites to be used exclusively for cultivation, no trimming, processing, packaging, or manufacturing.
14. Allow multiple grows sharing 200 acres plus parcels, well removed from rural neighborhoods, and using roads that do not go through neighborhoods.
15. Retail should be allowed like any other stores, i.e. car dealerships, clothes, wineries, grocery stores.
16. Limit acreage in any 10-mile square zone to prevent over-concentration of any one area.

#### **D. Odor**

1. Odor should stop at the property line. *(Multiple participants made or supported this comment.)*
2. Use the setbacks for pig farms (500 feet) for cannabis. *(Multiple participants made or supported this comment.)*
3. Do not allow outdoor grows within one mile of residences because of the odor. *(Multiple participants made or supported this comment.)*
4. Require temporary cannabis hoop structures for outdoor cultivation to help mitigate odors. *(Multiple participants made or supported this comment.)*
5. Odor can be mitigated by filtration in green houses. Require green houses for larger grows. *(Multiple participants made or supported this comment.)*
6. Evaluate each proposed site/permit for wind patterns and intensity through an EIR. *(Multiple participants made or supported this comment.)*
7. Hemp and cannabis smell the same; there should be no added restrictions above what is imposed on growing hemp. *(Multiple participants made or supported this comment.)*
8. Outdoor agricultural odor is common in ag areas. Use the same restrictions across the board. *(Multiple participants made or supported this comment.)*

9. Restrict number of grows in an area to reduce odor.
10. Require grows to be only in areas where the wind doesn't typically pass-through rural neighborhoods.
11. Require grows to be only in industrial areas to filter odor.
12. Require setbacks bigger than 300 ft.
13. Require 1,000 ft. setbacks for odor.
14. Require indoor grows that cannot allow odor to leave the building.
15. Require the planting of other flowers to help mitigate cannabis odor.
16. Require growing only low odor strains.
17. Require the use of Ortech to determine proper setbacks.
18. Develop science-based odor detection threshold for acceptable limits at property line. Require cultivators to keep odors below threshold. If odor levels exceed threshold more than 3 times within one year, cultivator would be subject to fines and immediate abatement of odor. If fines are not paid within 60 days, permit would be withdrawn. If odor levels exceed threshold more than 5 times in one year, cultivation permit would be withdrawn.
19. Consider removal of minimum 10-acre parcel size in allowed zones with advanced odor mitigation measures (such as vapor phase system) required on sub-10-acre parcels and increased setbacks from neighboring homes.
20. Do not require low odor strains, as terpenes have medicinal value.
21. Limit number of large outdoor grows to limit odor.
22. Use the California Air Resources Board guidelines.
23. Permits should only be issued to outside grows for 2 years to determine if odor is properly being controlled from neighboring residences, and if not, immediate abatement proceeding should be commenced and concluded at operators' expense and if no compliance permit should be revoked.
24. The County should research complaints about respiratory toxicity and report on it.
25. Study submitted for County review: "Emissions from cannabis growing facilities may impact indoor and regional air quality: Pilot study evaluates potential for air quality impacts at facilities in Nevada and California." from Science Daily (2019).  
<https://www.sciencedaily.com/releases/2019/09/190918100230.htm>

#### **E. Noise**

1. Do not allow processing, events, or retail on agricultural land because of the noise. (*Multiple participants made or supported this comment.*)
2. Require certain decibel levels on equipment. (*Multiple participants made or supported this comment.*)
3. Use the noise ordinance in the General Plan, reflecting other agriculture and businesses. (*Multiple participants made or supported this comment.*)
4. Do not allow electrical in hoop houses.
5. Do not allow leaf blowers.
6. Do not allow loud filters to be near people's homes.
7. Do not allow amplified, broadcasted music.
8. Do not allow fans or ventilation systems, etc. that make noise to operate from 8 PM to 6 AM.
9. Only allow operations in industrial zones due to noise from equipment, employees, and more.
10. Only allow distribution operation to "certain times of the day."
11. Only allow traffic from 8 AM to 5 PM.
12. Only allow operations from 9 AM to 5 PM.

13. Require 20-acre parcels which will help control noise.
14. Require equipment to be inside a structure.
15. Require operators to use shuttles or scheduling to limit employee noise.
16. Require cannabis to be subject to nuisance laws.
17. Limit the number of employees allowed onsite.

#### **F. Accountability related to land use**

1. Successful accountability involves transparency. We should be able to go your website, see every permit request with addresses, LLC names, complaints, and status. *(Multiple participants made or supported this comment.)*
2. Require regular inspections without notice.
3. The County should require regular audits, like Napa County's winery audits. *(Multiple participants made or supported this comment.)*
4. Require a bond upon permit approval to assist with the removal of abandoned hoop houses and other equipment. *(Multiple participants made or supported this comment.)*
5. Cannabis enforcement costs should be funded by cannabis tax revenue. *(Multiple participants made or supported this comment.)*
6. There are already inspections required by six agencies (County and State). Do not require more. *(Multiple participants made or supported this comment.)*
7. There should absolutely be a constructive approach to supporting farmers to come into compliance, at least in acknowledgement that this is a new territory for both sides, and many new operators/farmers. Most people want to comply and are repetitively overburdened by penalization, fees, and pressure from code enforcement. There needs to be a balance between enforcement and support, both financially and administratively. Sonoma County could be supporting and collecting hefty tax revenue yet continues to ostracize and continuously change policy on farmers. *(Multiple participants made or supported this comment.)*
8. If legal cannabis cultivators are operating within the regulations and Sonoma County Department of Agriculture Best Management Practices and are being subject to harassing complaints, the complainant should be fined for wasting county staff time. *(Multiple participants made or supported this comment.)*
9. The County and community must stop treating cannabis operators like criminals and not like other businesses. By regulating them into parity with other agriculture, we can only expect to see a thriving illicit market. *(Multiple participants made or supported this comment.)*
10. The County must determine how many illegal grows exist and deal with them.
11. The County must destroy illegal cannabis plants.
12. The County needs to investigate all reports immediately after they are submitted.
13. The County needs to investigate all reports immediately without advance notice to operators.
14. The County needs to investigate all complains within 24 hours of submission.
15. The County must enforce violations within two weeks.
16. The County should hire more code enforcement and peace officers.
17. The County should hire a dedicated Cannabis Program Manager, who would coordinate with the various departments involved and serve as a liaison between the County and the public.
18. The County should create a dedicated unit to handle complaints, violations, and enforcement.

19. The County should create actionable rules, guidelines, and standards. Have staff both in the office and sheriffs/police that are dedicated to this.
20. The County should have a zero tolerance for violations.
21. The County should have a three strikes policy. Revoke permits and close the business.
22. The County should help operators comply before punishment.
23. The County must operate code enforcement and investigations 24/7 because not all issues arise or can be handled during office hours.
24. The County should educate the public about cannabis to stop neighbors from reporting for any reason (specifically non-violations).
25. The County must monitor production closely to disallow growers from increasing production for profit.
26. The County needs to review code compliance on a regular basis with at least 20% being reviewed annually. This will hold the industry accountable and not put the burden on neighbors to report.
27. The County needs to enforce Conditions of Approvals across the board – for cannabis, wineries, vacation rentals, etc. COAs should be revoked if conditions are not being met.
28. The County should establish a complaint line with an inspection automatically generated when there are three complaints from different parties who live adjacent to the operation. The inspection should include Nasal Ranger readings on three different occasions to take weather conditions into consideration. Fines and clean-up orders should be used to assure compliance.
29. The County employees should have the appropriate technology they need to monitor odor and odor control.
30. The County needs to inform and assist existing permit holders with the CEQA process for State licensing.
31. The County should showcase successful local operations to dispel concerns and lead by example.
32. Sheriff and police must log every complaint.
33. All neighbors should be notified that a permit application has been submitted, regardless of if it being a ministerial or use permit.
34. The County or operations should be required to compensate residents for their decline in property value.
35. All applications should be required to obtain a conditional use permit including all necessary CEQA review.
36. Operators should lose their license and permit if they do not comply with laws.
37. Require inspections three times a year.
38. Require annual renewals of permits.
39. Require annual renewals of permits and if operators are found to be out of compliance, abatement proceedings should be commenced and pursued to conclusion with operator paying all costs.
40. Require operators to pay an annual fee for inspections.
41. Require any operator violating zoning to pay all costs of the investigation and abatement.
42. Require operators to live onsite.
43. Offer a 24/7 reporting hotline that ensures swift response to concerns or issues with a set response time.
44. Residents should be able to register and get an email when a permit is being applied for.

45. There should be a period where the community can give input to any requested permit. Ideally there should be at an open town hall where the community can voice their opinion.
46. Do not allow drones to be used for monitoring.
47. Use drones to find illegal grows.
48. Incentivize industry to turn in illegal operations.
49. Allocate cannabis funding from the State of California to code enforcement to eradicate all illegal grows selling to the black market.
50. Do not approve permits for growers from outside the County.
51. Impose a local residency requirement in which operators are defined as owning at least 51% of the applying business.
52. Require proof of residence for seven years for operators.
53. Operators should be required to post a bond upon issuance of any permit to pay for potential abatement proceedings and fines.
54. Operators should not be given any special exemptions from County ordinances [e.g., see County Ordinance Section 13A-4 (c) (2)].

#### **G. Additional land use comments**

1. Adopt a moratorium until the EIR is completed and an ordinance is proposed and approved. *(Multiple participants made or supported this comment.)*
2. Do not allow cannabis in Sonoma County. *(Multiple participants made or supported this comment.)*
3. Ban all operations that grow THC. *(Multiple participants made or supported this comment.)*
4. Cannabis should fall under “Right to Farm” when grown in ag zones. *(Multiple participants made or supported this comment.)*
5. Sonoma County should view cannabis the same as the wine industry, or any other agricultural industry, in terms of where cannabis fits in the County. *(Multiple participants made or supported this comment.)*
6. The County should not just focus on cannabis – limit any new development or industry if our roads, fire prevention, or water resources cannot support it. *(Multiple participants made or supported this comment.)*
7. The County should have a plan to restrict residential expansion onto agricultural zoned land to help address residential concerns about agricultural operations and ag zoned lands. *(Multiple participants made or supported this comment.)*
8. The County should declare a temporary moratorium or pause in all permitting (not just cannabis) during this drought. These are unprecedented times. The Supervisors have already applied to reduce the required housing required by ABAG. Cut back on housing? Cut back on other water uses as well.
9. The County ordinance should mirror State ordinances.
10. The County should consult with State Fish and Game on impacts on wildlife that could forage in outdoor grows as well as impacts on normal movement of wildlife if territory is impeded by new restrictive fencing.
11. The County should study the impact of pets consuming cannabis.
12. The EIR should examine all current permits already issued, all people growing without a permit in the Penalty Relief Program, and all pending and reasonably foreseeable future permits. Other residential, police protection, fire protection and agricultural users in the unincorporated areas would be identified and their present and future needs assessed.
13. Do not implement a moratorium. Allow the applicants currently in the pipeline to be reviewed.



14. A successful program would mirror the grape and wine industry in Sonoma County, only on less acreage.
15. Base the new ordinance on Chapter 38.
16. Do not adopt Chapter 38 and engage with the State's cannabis licensing agencies as they merge and develop consolidated regulations as different changes to the County's ordinance will be needed for alignment.
17. We should promote small local growers. Big growers can grow in Kansas.
18. Allow farms to deliver.
19. Require facilities to
20. use renewable power, like solar power.
21. The Commercial Cannabis Ordinance, which was put in place before the true force and consequences of Climate Change was upon us, should be extremely scaled back.
22. Allow ownership transfers.
23. Study hemp impacts in EIR since it is the same plant as cannabis. Study how standards should be the same as hemp since federal cannabis legalization is coming soon. Study estimate of how many acres of cannabis were in production pre legalization as a baseline of impacts, size, visual, odor, etc.
24. Build in flexibility to evolve the program to remain consistent with State and Federal changes.
25. Do an economic analysis before the EIR to determine how much cannabis is currently being grown in California and how much could be grown in Sonoma and still be economically viable without going to the black market. Hire an outside consultant to peer review the economics.
26. Eliminate the Penalty Relief Program.
27. Pass the General Plan Amendment recommended by staff recognizing cannabis as agriculture.
28. Immediately re-establish the Board of Supervisors' Cannabis Ad Hoc Committee, or a Cannabis Standing Committee, to deal specifically with cannabis-related issues.
29. Advocate for regulating cannabis as agriculture with the California State Association of Counties, Rural County Representatives of California, regulatory agencies, our State representatives, and the Governor's office.
30. Create a process for current applicants and previous operators, and who were "zoned out" to be grandfathered in or receive priority processing on future applications.

## SAFETY CONCERNS

### H. Safe cultivation practices for emergency preparedness

1. Require outdoor cultivation in very high fire risk zones. Cannabis serves as a fire break. *(Multiple participants made or supported this comment.)*
2. Do not allow grows on narrow roads, specifically roads where there is no way to egress while the firefighting equipment is going the other way. *(Multiple participants made or supported this comment.)*
3. Require growers to have emergency and evacuation plans. *(Multiple participants made or supported this comment.)*
4. Treat cannabis cultivation the same as other agriculture regarding emergency preparedness. *(Multiple participants made or supported this comment.)*

5. Align all safety requirements with the State's requirements. (*Multiple participants made or supported this comment.*)
6. Require operations to be located within a defined response time for first responders, such as 5 to 15 minutes. (*Multiple participants made or supported this comment.*)
7. Do not require a defined response time for first responders. This is not required by other agriculture in the County.
8. Require all permitting to be based on the mandatory Findings of Significance, which protect adjacent property owner's right to health and safety.
9. Require sites to fire harden parking and travel areas.
10. Require sites to properly maintain dry grass and vegetation for fire mitigation.
11. Require sites to implement best practices around employee smoking.
12. Require operations to comply with the County's defensible space ordinance.
13. Require growers to comply with CEQA and all environmental laws.
14. Require all hoop houses to undergo a fire inspection.
15. Require growers to contribute financially on a per plant grown basis to road maintenance.
16. Require growers to have water tanks with the appropriate hook ups for fire hoses.
17. Require growers to have evacuation plans and demonstrate that they work.
18. Do not allow in high or very high-risk fire zones.
19. Do not allow commercial development in high fire risk areas because it will require new infrastructure, such as roads and power and gas lines will also exacerbate fire risk.
20. Do not allow indoor or mixed light cultivation in high fire risk areas.
21. Do not allow indoor or mixed light cultivation close to residentially dense areas.
22. Do not allow electricity in hoop houses in fire prone areas or near residential areas.
23. Do not allow industrial processes in remote, rural areas due to wildfire risk.
24. Do not allow near residential neighborhoods or towns. Increased traffic will impact residential standards and further degrade roads.
25. Do not allow highly flammable structures or equipment.
26. Do not allow in RRD due to fire risk and lack of public safety access.
27. Do not allow in SRA due to inadequate first responder resources.
28. Do not allow processing in rural areas due to public safety concerns.
29. Do not allow the use of volatile organic compounds, ethanol and high-pressure CO<sub>2</sub> extraction and distillation, all of which increase wildfire risk.
30. Do not allow cultivators to shoot, poison, sicken, injure, or kill wildlife for crop defense.
31. Allow cultivation on any roads, even narrow. If these roads can have residential, wineries, and other agriculture, they can have cannabis cultivation.
32. Allow cultivation only on roads that meet State fire safe regulation.
33. Allow cultivation only on minimum two-lane, standard roads (one lane in each direction).
34. Allow cultivators to add fencing/razor wire, etc., for facilities.
35. Allow cultivation in RRD and Class 3 or 4 water zones by requiring farms to help protect neighborhoods by creating firebreaks and other fire safety land management.
36. Allow cultivation to use water trucks for farming, which in turn can be used for fire mitigation and fighting.
37. Allow processing only in the "central corridor" due to adequate roads and safety response times.
38. Limit chemical storage in high fire zones.
39. Create exclusion zones to determine where cannabis cultivation will not be safe due to wildfire risk.



40. SRA 4290 driveway standards should be extended on a case-by-case basis.
41. Only allow cultivation if there are fire safe roads and residences are at least 5,000 ft. away.
42. Only allow operations in areas with fire insurance coverage availability.
43. Only allow certain vehicles that meet specific size and noise limits. It is recommended that grows in such situations have separate emergency fire roads that do not share the same roads as residents, so that fire equipment can be moved in and evacuees are not hampered by incoming equipment for commercial institution firefighting, or outgoing workers from the large grow, who add their vehicles and equipment to the mix.
44. Evaluate the safety of roads in areas of proposed cannabis cultivation for emergency access and fire evacuations.
45. Evaluate each proposed site for where illegal access could be made.
46. Study electrical, lighting and plumbing for hoop houses for electricity use and fire hazards.
47. Support cannabis cultivators in removing dead trees on their properties.
48. Continue to use the current Fire Safety Plan requirements.
49. The County must make cannabis farms exempt under BOF rules by considering it agriculture in the zoning code. Farms create fire breaks and have water storage available for firefighting.
50. All new developments, no matter for residential, commercial, industrial, or agricultural must meet all fire safe zones including access, flood zone considerations and seismic issues. Cannabis should be no different.

#### **I. Safe and secure cannabis cultivation and retail operations**

1. Allow small growers to cluster on large parcels to reduce investment in security and resources. *(Multiple participants made or supported this comment.)*
2. Allow growers to cluster in industrial areas to share security resources. *(Multiple participants made or supported this comment.)*
3. Allow cannabis farms to operate and look just like other farms. (i.e., no additional measures, being allowed to be seen from public right of way, fencing, or security lighting required.) *(Multiple participants made or supported this comment.)*
4. Give permits only to Sonoma County residents. *(Multiple participants made or supported this comment.)*
5. Require background checks for all employees, including growers. *(Multiple participants made or supported this comment.)*
6. Do not publish a list of licensed farms or distributors. This could increase risk of crime. *(Multiple participants made or supported this comment.)*
7. Align all safety requirements with the State's requirements. *(Multiple participants made or supported this comment.)*
8. Allow choice of armed and/or non-armed guards in non-incorporated areas. This would align with Countywide and city regulations and State guidelines.
9. Allow "hostile vegetation" for security barriers.
10. Allow only in industrial and commercial zones that can provide necessary security features.
11. Allow exceptions for taller fencing to further shield sites from the public.
12. Allow downward facing, warming spectrum, shielded motion detector lighting.
13. Allow onsite security to live at the farm or retail operation.
14. Allow delivery-only retail with an MUP.
15. Do not allow dispensaries in areas with limited law enforcement response (i.e., Glen Ellen).
16. Do not allow operations of any kind near residential areas.
17. Do not allow guns.

18. Do not allow drones.
19. Do not allow any combustible items on the property that are not necessary for operation and require safe and appropriate storage to be in each permit.
20. Do not allow cultivation sites to retain or store product to reduce the risk of robbery or violence.
21. Only allow cultivation to be exclusively for cultivation. Do not allow cultivation sites to trim, process, package, manufacture, or distribute. That should be done in commercial/industrial zones.
22. Only allow retail operations in cities and incorporated areas.
23. Only allow operations in areas with theft-related insurance coverage availability.
24. Require retail operations to lock their doors.
25. Require retail facilities to always have onsite security personnel.
26. Require sheriff patrols in areas of cannabis operations.
27. Require retail operations to provide customer entry only with ID confirmation of legal age.
28. Require facilities to be in industrial zones with security already in place.
29. Require facilities to have fences and cameras.
30. Require security cameras operating 24/7 with all footage being retained for a designated period.
31. Require security cameras and that footage must be always available by request.
32. Require only security cameras and access to banking for cultivation per State compliance.
33. Require security plans.
34. Require security plans that also address security for neighbors.
35. Require transparency in security plans to build trust with neighbors.
36. Require devices to be installed that can summon police immediately if activated.
37. Require cultivators to carry insurance that covers their neighbors in case of a security incident.
38. Require cultivators and staff to help neighbors if there is a security incident.
39. Require security personnel to be certified by the Sheriff's Department.
40. Require retail to lock up merchandise (like jewelry store) at close.
41. Require the same permitting for temporary electricity for hoop houses and permanent electricity.
42. Require signage with prominent law enforcement insignia for licensed activities.
43. Align all safety and security requirements with State law.
44. Support from law enforcement should include a cannabis liaison and sheriff hotline (to call and text) for safety related matters involving cannabis.
45. Have law enforcement do scheduled site visits to review security and safety standards and provide input/advice on how to further improve, if needed.
46. Cannabis cultivation sites are required to have fencing, vegetative screening, site security plan, security cameras, and recorded video, to ensure site safety and document operations. This is more than adequate and should be continued as is in new ordinance.
47. Use armed security trucks (like banks) for transporting product.
48. Use a Crime Prevention Through Environmental Design (CPTED) process.
49. Limit the amount of cannabis and cash onsite.
50. Limit advertising alongside roads.
51. The "feel" of Sonoma County would be affected by security cameras everywhere.

## **J. On-site/social cannabis consumption**

1. Only allow events in commercial or industrial zones. (*Multiple participants made or supported this comment.*)
2. Do not allow onsite consumption at all. (*Multiple participants made or supported this comment.*)
3. Do not allow onsite consumption in rural areas due to traffic and road safety. (*Multiple participants made or supported this comment.*)
4. Do not allow tasting rooms unless a “DUI” style test is available for cannabis use. (*Multiple participants made or supported this comment.*)
5. Allow licensed farms to do tastings and events with use permits like wine and other agriculture. (*Multiple participants made or supported this comment.*)
6. Allow retail to operate consumption lounges. (*Multiple participants made or supported this comment.*)
7. Allow medical consumption lounges to provide Section 8 housing residents a safe place to consume. (*Multiple participants made or supported this comment.*)
8. Canna-tourism should not occur until the County has figured out how to ameliorate the current problem with winery tourism’s negative impact on rural neighborhoods. The idea that wineries aren’t economically viable without the ability to become hospitality and event centers is a big mistake and shouldn’t be repeated with cannabis. If cannabis growers can’t be profitable from sales of their product, then they don’t have a valid business plan and shouldn’t be granted permits in the first place.
9. Do not allow distribution from grow sites. Just because there are winery tasting rooms everywhere, doesn’t mean there should be cannabis tasting rooms. It’s hard to spit out cannabis.
10. Do not allow consumption lounges on residential roads due to concerns about increased traffic.
11. Do not allow onsite parking. If customers cannot walk to their vehicle they should not be driving.
12. Do not allow events at all.
13. Allow cannabis operations to be close to wineries so all recreational drug and alcohol drinks are together for the consuming public’s convenience.
14. Allow small group gatherings and annual events (like Wine Road).
15. Allow large scale events, like the Emerald Cup, which are restricted to one location and do not impact the rural neighborhood environment over a continuing period.
16. Allow tasting room/lounges to have add-ons like a yoga studio, coffee shop or restaurant.
17. Allow consumption lounges with an MUP.
18. Allow tasting at farms and dispensaries, if not visible to public.
19. Allow farm stands and direct-to-consumer sales on a property where a cannabis permit has been issued provided that the applicable State licenses have been obtained.
20. Only allow facilities in industrial areas/warehouses where they can easily hold events.
21. Only allow consumption lounges in LEA.
22. Only allow in areas where cultivation is allowed.
23. Only allow consumption lounges at retail operations.
24. Only allow tours led by designated drivers.
25. Require staff to “cut off” customers if “stoned.”
26. Require operators to have liability insurance if an impaired customer leaves and causes an accident.

27. Require retail to be appointment only.
28. Change the definition of retail to allow for farm stands and buds & breakfasts.
29. The EIR should study onsite consumption and its pros and cons.
30. Use the regulation aligned with cigar use.
31. Develop trigger language that will allow issuance of a permit or other authorization for cannabis direct to consumer sales so one can submit a State license application once the State develops regulatory language for their licensure.

#### **K. Accountability related to safety**

1. More oversight is not needed. Licensed cannabis cultivators are subject to inspections, violations, and oversight from five agencies. This is more than adequate to ensure cannabis remains one of the safest industries in the State. *(Multiple participants made or supported this comment.)*
2. The County must discourage the public publishing of licensed cultivators and distributors. *(Multiple participants made or supported this comment.)*
3. Complainants should be fined for “wasting personnel time” if claims are determined to be falsified against businesses. *(Multiple participants made or supported this comment.)*
4. Create a neighborhood watch program. But first we must embrace these operators and not marginalize them. *(Multiple participants made or supported this comment.)*
5. The County should incentivize legal cannabis businesses to turn in illegal businesses. *(Multiple participants made or supported this comment.)*
6. The County should not incentivize legal cannabis businesses to turn in illegal businesses. *(Multiple participants made or supported this comment.)*
7. The County needs to educate the public about cannabis policies and ordinances, especially neighborhood groups. *(Multiple participants made or supported this comment.)*
8. The County needs to increase transparency by publishing the results of inspections and follow-ups. *(Multiple participants made or supported this comment.)*
9. Allow farm and dispensary tours to the public to educate them about cannabis, crime, and safety.
10. Sheriff and police should only be involved in crime and safety issues and that information should be tracked and reported in permit reviews.
11. The Sheriff is not logging incidents. Our neighborhood has phoned in numerous incidences and requested they be logged. A later search showed the lack of logging by the Sheriff.
12. Sheriff and code enforcement should work more closely.
13. County enforcement staff should tour businesses and operations and share how they can be more compliant, if needed. Build trust between regulation and operations.
14. The County needs more staff for enforcement.
15. The County needs to increase transparency by publishing how its funds are being spent regarding cannabis.
16. The County should not allow former police officers to serve as code enforcement officers for cannabis.
17. The County needs to protect not only cultivators, but also distributors and retail operations.
18. The County should reach out to other counties and states to learn from their experience and data about impact of legalization of cannabis, including enforcement and complaints.
19. The County needs to destroy illegal plants.
20. The County needs to find ways to protect cannabis operators from harassment and abuse from neighbors.

21. The County needs to find ways to protect neighbors from being harassed or threatened by “bad players.”
22. The County must require safety plans for operations and the County must review periodically for compliance.
23. The County must seek information from other California counties and other states to measure effect on financial crimes and regarding the safety and security of all cannabis-related financial transactions.
24. The County must make cannabis-related crime data more accessible.
25. The County should host a quarterly cannabis-related crime meeting with the Sheriff and the public.
26. The County needs to implement frequent, unannounced inspections.
27. The County should require bonds and other advanced measures to pay for corrections to projects that become nuisances.
28. The County must remove any discretion from the Ag Dept. and Permit Sonoma/Code Enforcement.
29. The County needs to dedicate planners in Permit Sonoma to review cannabis permit applications. With the fires and other permit issues, the cannabis permits have created a major backlog with some applicants waiting four years for a determination. Cannabis permit fees sufficiently cover dedicated planning staff, and more permit applications would be filed if the process were more efficient.
30. Every violation needs a sufficient fine.
31. There needs to be an increase in police and fire funding proportional to the number of cannabis permits given out. This needs to be put in writing in the ordinance to make sure that there are equate resources available and this will not impact other areas.
32. The County needs to use taxes to fund emergency responders and law enforcement.
33. Cannabis taxes from compliant businesses should not be used to go after the alternative market cultivators. Keep cannabis taxes low. Find another funding source for enforcement on non-regulated cannabis cultivators lest we make the barrier to permitting too high.
34. Cannabis businesses should pay for the salaries of County enforcement staff since these businesses are the reason the staff is needed.
35. Cannabis permit holders should pay for the County inspections through fees.
36. Any person performing an illegal or unpermitted activity should be required to stop all activities immediately, dismantle operations, pay a fine, and be under a two-year probation where the violating operator will not be issued any cannabis permits.
37. Consider a list of recommended actions that individuals can put in their application, such as a Good Neighbor Policy, that are not required but are suggested. Reaching out to neighbors before hearings and regularly could be another item on the list to increase accountability.
38. Stay any fines when there is self-reporting, as an incentive for unpermitted work to step forward to make proper corrections. Fines would be waived after permits are issued and the work completed. If permits were not issued, and/or the work not completed, the fines would of course not be waived, and the stay would be lifted, meaning payment would be due.

#### **L. Additional safety comments**

1. The County should impose a moratorium on permitting until the EIR is complete, including safety and security. *(Multiple participants made or supported this comment.)*
2. The County should support legislation for updated regulation around banking for cannabis. *(Multiple participants made or supported this comment.)*

3. EIR should examine how cannabis cultivation can benefit fire safety and mitigation (i.e., onsite water storage, fire breaks). (*Multiple participants made or supported this comment.*)
4. EIR should study the reduction of cultivators and its impact. (*Multiple participants made or supported this comment.*)
5. EIR should study how licensed cannabis businesses have become safer since gaining access to banking and eliminating the need for cash onsite. (*Multiple participants made or supported this comment.*)
6. EIR should study how alcohol is regulated for onsite consumption and land use and allow cannabis the same permissions. (*Multiple participants made or supported this comment.*)
7. EIR should study the health and safety of first responders in the vicinity of burning cannabis farms.
8. EIR should study the impacts on wildlife living in or near cannabis farms and how the building of new farms could impact wildlife corridors.
9. EIR should study climate change and wildfires.
10. EIR should study the public safety and public health risks of cannabis cultivation and its impact on residents.
11. EIR should include a “no commercial cannabis cultivation alternative” (i.e., no project alternative).
12. EIR should study the effectiveness of security cameras and guards.
13. EIR should study public safety conditions, including capacity of first responders to address additional commercial development in fire risk zones and remote areas.
14. EIR should study rural roadways for fire risk, resulting in the prohibition of commercial development in areas that are too risky.
15. EIR should study crimes against regulated vs. unregulated businesses.
16. EIR should study the impact of cannabis regarding DUIs, including accidents and fatalities.
17. EIR should study the impact of cannabis on homelessness, crime, and mental health.
18. EIR should study the complaints filed by residents and how to avoid issues in the future that put the health and safety of residents at risk.
19. The County should continue to review/approve permits. The cost of permitting pays for enforcement.
20. The County Board of Supervisors should disclose any commercial interest or conflicts of interest with the cannabis industry.
21. The County should implement an education program about THC products in all schools.
22. Allow companies to donate cannabis to those in need to curb any desperate measures that people may take to rob a retail operation.
23. Cannabis farming is safer for fire prevention than a home being planted in a rural area. It uses less water too. Perhaps rural homes are the issue versus farmers growing plants?
24. I think this industry should be treated like other agricultural uses. If you did this to the wine industry you would not be drinking wine anymore.
25. The new ordinance should have no change to the current requirements for site security and fire safety unless it is to lessen requirements and treat cannabis cultivators like other legal businesses in the County.
26. Enabling a controlled substance to be vertically integration where a grower can grow, process, self-distribute and sell retail is fraught with potential fraud up and down the supply chain. This vertical integration makes it near impossible for the regulatory agencies to monitor this fraud. The lack of enforcement leads to growers cutting corners to increase their

margins and lower their taxes. A significant increase in oversight/enforcement is needed to deal with these complex and cross agency issues.

27. Engage with the community to establish a successful Cannabis Equity Program specific to Sonoma County to help local operators who've been disproportionately harmed by the war on drugs, from prohibition or overregulation. Enforcement without opportunity is a failed paradigm.
28. It would be ideal to mitigate some of the neighbor concerns early in the application process. One suggestion was to hire a formal mediator to hear support and opposition to the project to be presented in a formal report.

## WATER CONSIDERATIONS

### M. Protection of water resources

1. Do not allow it in zones 3 and 4. (*Multiple participants made or supported this comment.*)
2. EIR should examine water tables, drinking water, watersheds, and fish habitats. (*Multiple participants made or supported this comment.*)
3. Do not allow new wells. (Not including replacing aging, drying wells) (*Multiple participants made or supported this comment.*)
4. Do not allow outdoor grows – they are not environmentally sustainable given impacts on groundwater resources and wastewater discharge - which cannot go in septic systems per Water Quality Control Board.
5. Do not allow cultivation in the already impaired watersheds. Water intensive commercial use will further exacerbate conditions.
6. Do not allow growing in catchment basins, which are not adequate mitigation as water scarce areas have confined aquifers subject to overdraft and reduced groundwater replenishment.
7. Do not allow any agriculture that uses water – grapes, food, cannabis, etc.
8. Do not allow operations in neighborhood where people use wells for everyday use.
9. Do not allow growers to source water from rivers or streams.
10. Do not allow grows in the northwest Petaluma Valley per a recent study by the Petaluma Groundwater Sustainability Agency that reports the groundwater basin is in decline. (<https://www.petaluma360.com/article/news/agency-finds-petaluma-groundwater-clean-cheap/?sba=AAS>)
11. Protect neighborhood well water. This impacts an entire neighborhood if you approve a permit on a parcel which uses well water.
12. Protect blue line creeks, rivers, lakes and natural ponds, wetlands, springs, artesian wells, seeps, and swales.
13. Protect vernal wetlands.
14. Protect creeks, rivers, water table, esteros, wells, and the ocean.
15. Protect groundwater.
16. Protect groundwater in residential areas of unincorporated County where we depend on wells to survive. Thousands of residents will be impacted if the aquifer water levels are drawn down to the point wells can no longer produce water.
17. Agree that we should look at all water use in the impaired watersheds. Water use should be prioritized for people and fish. Water for any commercial use would be limited. Big residential use should also be limited.
18. During permit reviews, the County must review boundary lines and the potential use for growers to “suck up the water in adjacent wells.”



19. Deny permits in which hydrogeology reports demonstrate high water demands that could impact neighboring wells, including drawdown.
20. The County's well permitting process needs to be updated to a conditional use permit away from a ministerial process which considers the effects a newly permitted well has on neighboring wells.
21. Allow it to be grown in water zones 1, 2, and 3.
22. Allow cannabis to be grown in water zones 3 and 4 - Many vintners and dairy owners are willing to convert acreage to cannabis to improve their cash flow to sustain their primary agricultural operations. This trade of 2 acres per 1 of cannabis results in net zero use.
23. Allow cannabis grows based on how many acres are requested in the permits and the availability of water on the site – not the water zone.
24. Require grow sites to use filtered recycled water, not ground water.
25. Require summer forbearance and storing water during winter high flows.
26. Require all permit applications – regardless of groundwater zone – to include hydrogeologist and well pumping reports to determine long-term water availability. All reports must be produced by licensed professionals and meet industry standards.
27. Require all operations to catch silt and run off per Water Quality Control Board requirements.
28. Permaculture, like design principles, should be encouraged with on contour swales infiltrating water, companion planting, mulching, and topsoil building.
29. Cannabis growing should follow the same rules as other agriculture.
30. EIR must assess how to protect our water resources on a sustainable yield basis and avoid long term decline.
31. EIR must assess net zero water plans and the viability of catchment basins. They may interfere with groundwater recharge and neighboring wells.
32. EIR must assess areas where public water and sewer, storm water drainage etc. are located. If not on public water, areas located in a groundwater basin where water use will not adversely impact environmental needs.
33. EIR must assess the cumulative impact of the current permitted acreage at 1-3 million gallons/acre/year, assess water availability and then set acreage caps by watershed or groundwater basin. This is because the operations harvest 2-3 times annually.
34. Water use impacts of cannabis production in ground water basins should be adequately mitigated by compliance with the requirements of the Sustainable Groundwater Management Act.

#### **N. Protection of natural habitats and riparian corridors**

1. Cannabis operators are subject to very strict Water Board, CA Dept Fish & Wildlife, County, and State regulations to ensure resources are protected. County ordinance should mirror State laws. *(Multiple participants made or supported this comment.)*
2. Sonoma County's natural beauty is one of our greatest treasures—and a draw for tourists. We must protect our riparian corridors and the creatures who live here.
3. Protect the Matanzas Creek area.
4. Protect sensitive watersheds like Green Valley, Mark West, Mill Creek and Dutch Bill
5. Protect rural areas that depend on wells, including those near creeks that empty to the Russian River, such as Franz Creek and Porter Creek. Vineyards have been tapping into these water resources for decades and cannabis will be another added burden.
6. Protect special status species.



7. Protect the larger riparian corridor setbacks defined by the State Water Resources Control Board Cannabis Policy. Follow additional protections of the CDFW mitigation measures and all other State requirements.
8. Do not allow operations to use the Russian River and its tributaries.
9. Do not allow cannabis to only be grown indoors, as this will not necessarily protect riparian corridors.
10. Do not allow cannabis to have the same setbacks for natural habitats and riparian corridors as other agriculture. It is not considered "agriculture" by the State.
11. Do not allow new wells to be at the same height as nearby streams.
12. Allow cannabis to have the same setbacks for natural habitats and riparian corridors as other agriculture.
13. Require cannabis to be grown indoors to protect riparian corridors.
14. Require any disrupted topsoil to be covered with hay and waddled to eliminate dust and runoff.
15. Require proper wastewater hook up to make sure that any runoff of chemicals does not end up in our riparian areas or groundwater supply.
16. Require 100' minimum setbacks from wetlands, riparian corridors, blue line creeks, natural lakes, and ponds to protect the resource and the survival of threatened and endangered species.
17. Require higher setbacks than 100', as that "assumes one size fits all, which is never the case in nature."
18. Require much larger setbacks for wells drilled near riparian corridors - groundwater drawdown does reduce stream flow, impacting special species.
19. Use the property setbacks for Riparian Corridor Stream Conservation Areas already in place for agriculture, including vineyards and orchards.
20. Class three setbacks should be State setbacks. All other setbacks should be discussed at BOS meetings.
21. Lower the setbacks from creeks. It is currently too extreme.
22. The County must implement an analysis of the water flow patterns in all riparian areas.
23. The County must implement an analysis of sensitive watersheds to find any endangered and sensitive species.
24. The County must implement an analysis to see if it should double State water setbacks or follow the strictest of agriculture/water-related standards.
25. The County must monitor each creek system several times a year, including animal counts.
26. The County must implement any analysis/study of riparian/sensitive areas during the rainy months. Doing so in August, for example, will make sure you do not find rare and endangered species.
27. The County should allocate a portion of cannabis-related tax money towards riparian corridor conservation.
28. The County needs to clean up the Russian River like it was prior to 1976 when the banks were free from water alders and willows that use incredible amounts of water.
29. The County needs funding for enforcement of illegal grows using riparian areas for mixing chemicals and withdrawing water.
30. The County must publish an update about rural flora and fauna and all farmers, grape and otherwise, plus housing developers, should be held accountable for what they do to the land henceforth. Studies documented from a 1979 report of rural Sonoma County flora and fauna have already shown a severe reduction in species during the last 40 years

31. Create inclusion/exclusion zones for impaired watersheds.
32. Incentivize larger than required setbacks, applicants who work with Conservation Districts to restore riparian areas and utilize open space money to protect some of these properties that are applying for small grows on large acreage.
33. Incentivize organic farming.
34. Incentivize the planting of beneficial plants to reduce the loss of topsoil.
35. CDFW must sign off on any proposed operation.
36. Allow for appropriate setbacks to avoid run off pesticides, and other erosion per CDFW.
37. Agree with CDFW - carrying capacity analysis is required with a limit on density or acreage of cultivation sites.
38. Follow the CDFW recommendation to use Geo Spatial analysis to map boundaries at parcel scale.

#### **O. Water conservation and drought**

1. Incentivize or require water catchment. *(Multiple participants made or supported this comment.)*
2. Do not allow water catchment as it “takes water from existing water needs”, “does not permit groundwater recharge,” creates run off into streams, and is “inappropriate” during a drought. *(Multiple participants made or supported this comment.)*
3. Incentivize or require dry farming. *(Multiple participants made or supported this comment.)*
4. Do not allow or require dry farming. *(Multiple participants made or supported this comment.)*
5. Require or allow drip systems for irrigation. *(Multiple participants made or supported this comment.)*
6. Incentivize or require in-ground growing – it uses half the water as above ground smart pots and can use automated irrigation. *(Multiple participants made or supported this comment.)*
7. Build trust and learn -- Have a few "practice farms" - use the farms already permitted - and monitor them to see how it goes - almost like how a franchise is created. We need more data before we can make such important decisions. Meter their water, disclose all complaints and solutions, have a person on both the County side and the cannabis farm side who communicate about the issues and have them steward the way forward for others. This can begin now and hopefully help provide data and trust over the next 3 years as the ordinance is developed. *(Multiple participants made or supported this comment.)*
8. EIR should study rainwater catchment reservoirs/ponds and determine if they interfere with groundwater recharge of the aquifers and/or downstream flow. Also determine how many can be built if agreeable with future health of watersheds. *(Multiple participants made or supported this comment.)*
9. Do not allow trucked in water. *(Multiple participants made or supported this comment.)*
10. Do not allow trucked in recycled water due to worries of water contamination.
11. Do not allow any grows due to the drought.
12. Do not allow “mega grows.”
13. Do not allow pumping water for cannabis cultivation in same deferment period as direct diversion.
14. Do not allow operations to draw from sphere of influence of neighboring wells.
15. Do not allow cannabis to only be grown indoors using only recycled water, it will not save water. (<https://www.politico.com/news/2021/08/10/weed-cannabis-legalization-energy-503004>)

16. Do not allow groundwater extraction - Parcels without access to municipal water sources often extract water from the stream either through direct diversion from the stream or from near stream wells that intercept subterranean stream flow, or from groundwater wells. Groundwater extraction has the potential to impact groundwater dependent resources and reduce streamflow, especially during the late spring and summer months.
17. Do not allow diversion during low water flows, which will come every summer per CDFW.
18. Allow greenhouses for growing – they are a great way to conserve water.  
(<https://www.prnewswire.com/news-releases/gotham-greens-accelerates-growth-with-west-coast-expansion-301237779.html>)
19. Allow hoop houses to conserve water, including allowing them to be up year-round, not just 180 days.
20. Allow growers to truck in water during drought.
21. Allow for adequate water storage approved by an expert per CDFW.
22. Allow faster permitting for greenhouse and/or mixed light grows.
23. Allow cannabis in zones 3 and 4 if hydro reports say there is enough water - if you want cannabis farms in zone 1 and 2, there will be more neighbors impacted.
24. Allow operators to manage their farms with more flexibility for best water management. Flexibility means rotation, smaller setbacks.
25. Only allow small farms to lessen water use impacts.
26. Only allow one dry farmed crop per year for each permitted grow.
27. Only allow in-ground planting.
28. Only allow cannabis to be grown indoors and require soil probes to limit water use.
29. Require grows to be indoors to save water.
30. Require grows to be indoors and to use recycle water to save water.
31. Require all grows to have rain catchment, ponds, and/or reservoirs.
32. Require cultivation in raised beds or smart pots with drip irrigation and zero water waste.
33. Require cannabis operators, just like Sonoma County residents and other forms of agriculture, to reduce their water use during droughts.
34. Require or incentivize cover crop during down time.
35. Require or incentivize mulch.
36. Require only low water strains to be grown.
37. Require operations to have grey water systems and storage systems installed.
38. Require evaluation of water needed for each expected crop, to ensure that there is water available for up to four crops a year.
39. Require drip systems or hand watering.
40. Require bonds or insurance for financial protection if a cannabis operation causes a well to “dry up.”
41. Encourage commercial cannabis as supplemental farming on land with other crops. Farmers can reduce water on one use to accommodate cannabis farming. This increases the value per gallon of water used, helping the local economy while saving water.
42. Enforce a percent reduction of land planting due to the drought per farm. Many farms in California are limiting their planting to 75% of their available space.
43. Have the cannabis industry invest in developing strains that use less water and require only these strains be planted.
44. In a drought, many large trees come under threat of dying. Trees are crucial for keeping temperatures down, particularly in urban areas. So, they should have a priority with water allocation.

45. In drought years, cannabis operators (and others) should have as a condition of their permits that they could lose their rights to water, if necessary, to protect our rivers, streams, habitats, groundwater, etc.
46. Given the current and what appears will be future water shortages, only operations that use onsite water supplies that do not impact any water supplies outside of the cannabis related properties should be allowed, if at all.
47. In times of drought, water-demanding commercial crops such as almonds, alfalfa, grapes, rice, and cannabis should be severely restricted or banned.
48. Offer grants for water catchment, ponds, and/or tanks.
49. The County should reserve the right to reduce the extent of any permitted activity including, but not limited to, the area of cultivation allowed under any issued permit if environmental conditions (such as a sustained drought or low flows) where commercial cannabis activity (or any other activity) is located and will not support water withdrawals without substantially and adversely affecting existing fish and wildlife resources.
50. The County should fund a study into trapping and recycling humidity in inside grows, as this would lead to one of the most efficient uses of irrigation of cannabis plants.
51. Adopt Israeli farming techniques. (<https://www.capradio.org/articles/2015/12/11/california-farmers-could-learn-drought-lessons-from-israel/>)
52. EIR should analyze drought year water availability in areas to be considered for cultivation. Do not evaluate average year conditions. Due to climate change and historical low averages, the County should not use historical averages.
53. EIR must analyze the impacts of cannabis on groundwater.
54. EIR must address cumulative effects of groundwater and surface water withdrawal, not on a project-by-project basis.

#### **P. Accountability related to water**

1. The County needs to be more transparent on water usage with publicly available data. *(Multiple participants made or supported this comment.)*
2. The County should revoke permits for violations. *(Multiple participants made or supported this comment.)*
3. Only allow one-year permits. If permits are only for one year, the water situation could be more accurately assessed, and production dialed up or down depending on rain situation.
4. Do not allow self-reporting for water use. *(Multiple participants made or supported this comment.)*
5. Use smart metering for monitoring. *(Multiple participants made or supported this comment.)*
6. The County needs more staff for enforcement. *(Multiple participants made or supported this comment.)*
7. The County needs to implement well monitoring twice a year, including a well draw down test and visual inspection.
8. The County must make all water monitoring data public.
9. The County should use an expanded streamflow monitoring network and direct measurements of cannabis water use to further quantify/mitigate impacts of streamflow and sensitive species, per the UC Berkeley Cannabis Research Center.
10. The County needs to continue to use the current water use accountability systems it already has in place.
11. The County should deny permit renewals for new plantings during droughts.
12. The County should fine cultivators who fail to decrease their use during droughts, just like residents or other businesses are.

13. The County should serve cease and desist letters if well usage from operations cause a fall or fail in neighbors' wells.
14. The County should destroy or confiscate the crop as the result of violations.
15. The County budget should be augmented from taxes collected from cannabis businesses to hire more enforcement staff.
16. The County needs to continue utilizing the reporting in place (i.e., Site Management Plan) and not put anymore regulations, controls, inspections, or processes in place.
17. The County should use cannabis permit fees and taxing to pay for enforcement.
18. The County should implement 30% tax minimum, and it should go to County infrastructure.
19. The County should have the right to reduce the extent of any cannabis activity in the case of sustained drought or low flow, per Humboldt County.
20. The County should monitor existing wells and fine those who go over their allotment.
21. The County should have at least two individuals assigned to work with interagency teams.
22. Only allow operations in commercial and industrial areas so the County can easily monitor water use.
23. Require all water use to be tracked.
24. Require that facilities have adequate wastewater disposal.
25. Require every permit to submit for a State Water Board permit and provide biotic and hydrogeological resource studies for the proposed location.
26. Require impact studies on all proposed sites to determine impact on water resources.
27. Follow all the expert advice from the California Department of Fish and Wildlife in its March 2021 letter sent to the County.
28. Whistleblowers should be given a bounty for finding illegal grows and illegal water diversions.
29. Whistleblowers should be fined if what they report ends up being incorrect/falsified.
30. Heavy fines for rule breakers and a percentage of the fines to whistleblowers. This will incentivize the public to report issues. Perhaps use those whistleblower funds to establish an independently funded and independently run enforcement organization not associated with a government agency.
31. Let's assume that applicants are professionals who got into the white market to comply. Enforcement through education the first time. Chronic abusers are rare and should be fined.

#### **Q. Additional water comments**

1. Place a moratorium on cannabis-related permitting until the EIR is completed and circulated analyzing the County's water source capacity and current water use. *(Multiple participants made or supported this comment.)*
2. Do not permit cultivation from applicants who live outside of Sonoma County. "So tired of people only coming here to use Sonoma County's resources and not support it. Live here and farm it!" *(Multiple participants made or supported this comment.)*
3. EIR should include updated water condition data and usage for the County. *(Multiple participants made or supported this comment.)*
4. EIR should examine all constraints on our water supply by all users in the County, including everyone the Sonoma County Water Agency (SCWA) sells water to. It should be noted here that the SCWA also sells water to Marin.
5. EIR should review all users with water rights and evaluate the draw on the County's overall water systems. In this process the EIR can more accurately reach a conclusion about how much total water is available and how much can be used for new users in the unincorporated areas. New permits must rely on the best accounting of assumed water

supply. Climate change and drought may have altered these assumptions and an analysis of the existing usages and cumulative impacts needs to be a part of the EIR.

6. EIR should look at water to value, not water to area. An acre of cannabis is far more valuable than an acre of grapes.
7. EIR must assess increased public costs for public utilities, such as the need to upgrade water supply and conveyance facilities, wastewater treatment plants, landfills, and compost facilities.
8. EIR should study how the number of cultivators is arguably reducing when you look at how many traditional growers there were under medical rules and the elimination of many of these farmers through legalization. There is a net water savings which should be documented.
9. EIR should look at what Mendocino County is implementing and why Napa and Marin will not allow commercial cannabis.
10. EIR must assess County and city investments in upgrades to accommodate treatment of excess irrigation water or industrial process water at many existing wastewater treatment plants.
11. The County needs to test wells of adjacent neighbors in water zones 1 and 2 should be current. Some are 30 years old.
12. The County should set up a certification program for cannabis farming at SRJC to teach responsible practices and all current and future growers/applicants must attend and complete.
13. The County should heed the findings of the Napa County report ([https://www.winebusiness.com/content/file/9111\\_Report\\_082019.pdf](https://www.winebusiness.com/content/file/9111_Report_082019.pdf))
14. Cannabis cultivators maybe should undergo training like that of surgeon. Learning to farm sustainable is an intensive process that takes a long time.
15. For ideas, please make sure that you look at the massive amount of work product that came out of the Cannabis Advisory Group.
16. Rip out 32,500 acres (half) of vineyards and replace them with 1,000 acres of cannabis. You'll bring in more tax revenue and save 75% of the water.

## VISUAL ASPECTS

### R. Protecting Sonoma County's natural beauty

1. Avoid the complete alteration of the rural landscape that has taken place in San Luis Obispo and Santa Barbara counties. Don't sacrifice what brought many of us to the County in the first place – our rural beauty and natural landscape. *(Multiple participants made or supported this comment.)*
2. Protect Community Separators, parks, Open Space District lands, and the four categories of visual resources identified in the County's General Plan: Scenic Landscape Units, scenic corridors, greenbelts, greenways, and expanded greenbelts. *(Multiple participants made or supported this comment)*
3. Only allow cannabis to be grown in industrial or commercial areas to avoid visual impacts. *(Multiple participants made or supported this comment)*
4. Allow cannabis to grow in the same places as other agricultural crops, including hemp and grapes. *(Multiple participants made or supported this comment)*
5. Do not allow operations to be visible from scenic roads, parks or public right of ways. *(Multiple participants made or supported this comment)*

6. Do not allow cannabis to be grown in Sonoma County at all. *(Multiple participants made or supported this comment)*
7. Protect native woodlands and forests from further loss as they are a necessary component to mitigating the effects of drought and climate crisis.
8. Protect Bennett Valley and Sonoma Valley from commercial cultivation that involves structures like hoop houses.
9. Protect ridgetop views through setbacks.
10. Protect parks, trails, schools, playgrounds, woodlands, or rural residential houses or communities.
11. Do not allow large scale industrial operations and limit the number of growers per area to protect our special environment and minimize impacts (including visual).
12. Do not allow cultivation in RRD for visual reasons.
13. Do not allow cannabis to be grown in agricultural land.
14. Do not allow cannabis to cover viable agricultural land with buildings.
15. Only allow very small grows on large ag parcels (>10 acres) not visible from residential areas.
16. Only allow cannabis to be grown where it can't be seen from the road.
17. The County should consider assets valued by visitors in this decision including 1) a quality wine experience; 2) scenic beauty; and 3) rural character and small-town charm.
18. The County should include cannabis operations as a valued visitor asset due to cannatourism.
19. The County should use Community Separator provisions to protect rural residential neighborhoods and unincorporated towns.
20. The County must identify existing/eligible cultivation sites and allow permitting only at those sites.
21. The County should require permits to include an analysis of view sheds and simulations of views from public viewpoints such as trails, roadways, parks, and scenic vistas to determine the best siting to mitigate visual impacts.
22. The County should use the existing requirements tightly defined in ag zone areas: biotic studies, cultural resource studies, setbacks, slope, and water availability studies. This should not be changed as it already limits cannabis to appropriate areas within our beautiful County.

#### **S. Separating cannabis cultivation from the surrounding area**

1. Require all components of cannabis cultivation operations to be screened from public roadways, including the plants themselves and accessory structures. *(Multiple participants made or supported this comment.)*
2. Require visual concealment.
3. Require fencing.
4. Require operations to have natural screening.
5. Require cultivation to be separate from hospitality venues.
6. Require screening with plants that will grow tall enough to block 70% of view within 5 years of planting.
7. Require cultivators to replace dead or unhealthy vegetation.
8. Require fencing to complement the character of the area.
9. Require deer or cattle fencing with standard barbed wire.
10. Only allow the use of native plants for screening.



11. Allow hoop houses and 8-foot fencing with night-time security lighting if it does not impact private views.
12. Allow hoop house: They provide visual screening of cultivation area from the public and enhance security. Hoop houses can be screened with additional fencing, shrubs, and trees.
13. Require only certain species of plants to be used for screening. Screens made with trees that get tall could adversely affect views.
14. Require/incentivize/use hostile vegetation as an alternative to hard fencing.
15. Require/incentivize/use vegetative fences to shield views of farms from the outside.
16. Require/incentivize/use landscaped berms. They work better than vegetation alone.
17. Require/incentivize/use fruit trees and annuals (corn, sunflowers) to be planted in berms.
18. Do not require separation/screening. Cannabis looks just like hemp, which does not require screening. Other agriculture does not require screening, either.
19. Do not allow acres of land to be covered with 8+ ft high plastic screened fences that ruin scenic views and property values.
20. Do not require the use of plants that need irrigation for screening. Allow hoop house and fences. They are better at screening and protection and do not require irrigation.
21. Do not allow security fencing or lighting in rural landscapes. It's "ugly" and "jarring" and not attractive.
22. Do not allow Leyland cypress to be used.
23. Screened from view must mean not seen, not just hidden by a fence.
24. Both separation and size are important mitigations: Retain the one-acre maximum size limit.
25. The EIR should study how to utilize fencing, trees, and shrubs to screen hoop houses.
26. The unsightly view of hoop houses should be creatively addressed. Place artistic sculptures, painted flowers, etc. if you don't want to grow plants.
27. Restrict growing to small, well-screened "micro" or "boutique" producers, away from rural residential neighborhoods, or in warehouses in commercial industrial areas.

#### **T. Visual appearance of cannabis operations**

1. Do not allow hoop houses to have plumbing or electrical.
2. Do not allow hoop houses with 24/7 lighting.
3. Do not allow billboards advertising operations.
4. Allow advertising, signs, and billboards. Design is part of branding and should be left up to the owners.
5. Allow cannabis to be planted in the ground, uncovered in a space less than 10,000 sq. ft.
6. Allow cannabis to be grown outdoors in temporary hoop houses with mixed lighting.
7. Allow cannabis to be grown outdoors, not indoors. It is better outdoors, as indoor is less sustainable energy wise.
8. Allow hoop houses to be used all year, not just 180 days.
9. Allow greenhouses – they can be made to look beautiful. Glass greenhouses are a good choice, as they reduce water requirements and take advantage of natural sunlight augmented by artificial lighting to increase yield, but with less energy. requirements that full indoor cultivation.
10. Allow small grows at 5 acres minimum to ensure small farms can be prioritized.
11. Require residue from abandoned sites to be cleaned up. A deposit should be required so there are funds for clean-up if needed.
12. Require operations to be small.
13. Require 100% renewable energy.



14. Require that the provisions of the County's Open Space & Resource Conservation Elements are applicable to Commercial Cannabis Cultivation.
15. Use a Crime Prevention Through Environmental Design (CPTED) process.
16. Use biodynamic practices.
17. Use companion planting.
18. Use plants in the ground, sun-grown and, therefore, eligible for appellation designation.
19. Prioritize small to medium sized operations that show how a crop can be beautifully farmed in a sustainable manner. Rolling vineyards are acceptable, but cannabis is not?
20. What I would love to see is a healthy integrated poly-culture regenerative farm with a resident farmhouse with the owner operator living on the land while farming it. Grow small amounts 10,000 sq. ft or under in the ground outside with no hoops. Grow one crop a year planting early in the spring to take advantage of moisture in the ground. Water minimally if at all using drop irrigation. No security!
21. Cannabis operations should blend in with the landscapes. This means no white sheds, concrete, bright lights, etc. that make these grows look more like manufacturing facilities. If grows looked more natural, there would be much less community push back.
22. Outdoor grows in industrial areas should look like a tennis court facility mashed up with a cement plant.
23. The County should research companion planting, such as growing cannabis among tomatoes.
24. The County must allow public comment as part of cannabis operations design review processes.
25. The County must develop a Recycling and Plastic Management Plan to cleanup cultivation sites and to prevent pollution of natural resources, danger to wildlife and aquatic animals, prevent plastic debris drift on adjacent properties and public rights of way and reduce aesthetic blight.
26. As a parent, I would want the dispensaries to be clearly labeled, and ideally co-located with other dispensaries so I can more easily avoid the area.

#### U. Lighting

1. Allow hoop house to use minimal lighting as in Tier 1 Mixed Lighting State licensing (less than 6 watts per sq. ft.). *(Multiple participants made or supported this comment.)*
2. Allow downward facing, warming spectrum, shielded motion detector lighting.
3. Only allow motion detectors that operate for short durations.
4. Do not allow any lighting in hoop houses.
5. Do not allow electrical in hoop houses due to light pollution.
6. Do not allow night lighting. It is visually unappealing and harmful to animals.
7. Require grows to be inside warehouses to control lighting.
8. Require "dark sky" standards for any lighting.
9. Require that no light escape structures from dusk to dawn, and that security lights are aimed downward.
10. Use warm spectrum LED lighting. It has less harmful impacts on bird migration and human sleep.
11. Use blackout tarps or other covers to contain all lighting so none escapes hoop houses.
12. Incentivize eco-conscious lighting practices.
13. Maintain existing lighting standards.
14. Hoop houses protect crop quality from neighboring agricultural use spray-drift. Cultivators should be allowed to protect their crops with hoop houses because cannabis is subject to

very stringent testing requirements, and any pesticides residues could cause failed testing and destruction of product.

15. The EIR should document how impacts like light pollution are reduced to less than significant levels with cannabis regulations compared to other plants.

#### **V. Accountability related to visual aspects**

1. The County needs to provide a specific County phone number and email address for reporting violations. (*Multiple participants made or supported this comment.*)
2. The County must hold cannabis operations to the same lighting standards and accountability as other agricultural industries and businesses.
3. The County should continue to use the existing system of local and State permitting, licensing, inspection, and enforcement. It is more than stringent enough.
4. The County should require a \$50,000 mitigation bond upon issuance of each permit to cover the cost of removing structures, fencing, and trash if the operator abandons a site. This has to do with the consolidation of the cannabis industry and the possibility of operator bankruptcy.
5. The County must have a live person available 24/7 to respond to complaints about night lighting.
6. The County should revoke permits and destroy/confiscate crops for two or more lighting violations.
7. The County should quit issuing permits and revoke those already in place due to the County's lack of oversight or follow-up about code violations without additional community action. We should not have to be your watch dogs.
8. The County needs a larger budget for code enforcement.
9. The County should allow more permits to be approved to fund improved code enforcement.
10. The County should conduct surprise visits.
11. The County should provide enforcement through education.
12. The County should offer severe penalties for non-compliance, including closing operations that have multiple violations and excluding sites that have repeated violations from future permits.
13. The County must monitor people pulling multiple permits for small size cultivation with co-located operation that end up as large-scale commercial production in residential and protected areas.
14. The County should establish a reporting system that provides a tracking number (like trouble calls with phone service provider). This allows for the public to easily follow up about the status of violations.
15. Hoop houses should receive violations if they are not visually acceptable.
16. Set up a committee that comprises of members of the local regulatory bodies, exemplary cannabis operators, and community members to tour facilities and get familiar with project progress and compliance.

#### **W. Additional visual comments**

1. EIR should study how rules on this industry are already environmentally superior with prohibition on light pollution, well water meters, and no allowance of pesticide use. This is because standards on cannabis are more significant than any other plant (including the essentially identical hemp plant).

2. EIR must study the increase in public costs for landfill and wastewater treatment plant capacity, water pipelines, and additional code enforcement, police, and fire. (Not everyone agreed, citing that the wine industry doesn't have to show these costs.)
3. EIR needs to include if the County landfills have capacity to dispose of hoop house plastic. Sheet plastic from hoop houses needs to be regularly disposed of to prevent it from entering the environment.
4. EIR should consider how legalization may allow cannabis to fall under the Right to Farm ordinance.
5. EIR should study how to encourage best practices for cannabis cultivation when it is eventually treated like hemp.
6. EIR must assess the visual, traffic, noise, and viewshed impacts of cannabis.
7. Best practices for hoop house maintenance, waste and recycling efforts, and visual impacts should be developed when we cannot mandate unreasonable rules for an agricultural plant.
8. The Board of Supervisors Cannabis Ad Hoc Committee spent nearly two years conducting town halls and meetings with members of community to draft an updated ordinance. This work needs to be part of the public record.
9. We need a craft market: Ease restrictions, lower lot sizes, add back AR and RR, keep RRD, allow indoor, outdoor, hoop houses and greenhouses.