



July 14, 2025

Comments on Draft Environmental Impact Report and Cannabis Ordinance Amendments

The Neighborhood Coalition advocates for sustainable, environmentally sound, and neighborhood-compatible cannabis policies in Sonoma County in conjunction with education of the public on the health impacts of cannabis use. We separately filed comments entitled “The Draft Environmental Impact Report to Disclose the Adverse Health Effects of Cannabis Emissions.” These comments address other issues. In addition, the Neighborhood Coalition is part of the county-wide coalition with Save Our Sonoma Neighborhoods. We endorse and incorporate by reference the comments filed by Shute Mihaly & Weinberger on behalf of Save Our Sonoma Neighborhoods.

Overall, the proposed cannabis ordinance fails miserably in its stated goal to “Ensure cannabis uses are compatible with areas of concentrated residential uses.” DEIR, p. 5-2. Instead, it would have negative effects on the character of rural communities and their residents’ personal health and safety. We are also concerned about the irreversible impact of the proposal on the character of the County’s rural communities and the physical safety of the people who live there. Sonoma County is widely recognized for its rural character, bucolic countryside vistas, and small-town charm. For example, as discussed in more detail below, the proposal’s inclusion of ministerial approval of crop swap operations would allow literally indiscriminate approval and expansion of industrial-scale, commercial developments in rural neighborhoods. Similarly, the proposal’s attempt to treat cannabis as agriculture and its suggestion that cannabis be sold at rural farm stands would permanently alter the character of these rural neighborhoods. These and many other aspects of the proposal, detailed below, would dramatically erode the beauty and character unique to Sonoma County while importing significant health risks to residents, all in the name of recreational cannabis use and financial gain by cannabis entrepreneurs.

The proposed ordinance seems to have been written by the cannabis industry to try to reinvigorate cultivation in Sonoma County because Sonoma County cannot compete with more economically efficient operations elsewhere in California. Cultivation acreage in Sonoma County has dropped from almost 50 acres to less than 14 acres from 2017 to 2024. The Board of Supervisors is now using property taxes from rural communities to subsidize cannabis cultivation, thereby diminishing the quality of lives of those who paid the taxes. This is wrong at every conceivable level.

The DEIR (p. 5-33) states that only Alternative 2 (commercial and industrial zones only) and Alternative 5 (crop swaps) would eliminate significant and unavoidable environmental impacts. The DEIR (Table 5-2) wrongly concludes that Alternative 5 would eliminate more significant and unavoidable impacts than Alternative 2 because the DEIR fails to adequately address unhealthy air emissions, water consumption, traffic, and cumulative impacts in Alternative 5. The Neighborhood Coalition endorses Alternative 2, which is not only the environmentally superior alternative but also represents the only method (indoors) which has proven to be economically viable for both growers and county government. The County must choose an alternative that can avoid or substantially lessen the significant effects of the Project, even if this alternative would impede to some degree the attainment of the project objectives, or would be more costly. CEQA Guidelines §15126.6(b). What project objective would Alternative 2 impede?

I. The Proposed Setbacks and Parcel Sizes Do Not Protect Public Health or Achieve the Stated Goal of Neighborhood Compatibility; Greatly Increasing Setbacks and Parcel Sizes Are a Feasible Means of Mitigation.

It is evident from the discussion of air quality that the proposed setbacks for outdoor cultivation are woefully inadequate. It is illogical to attempt to protect a child at school 8 hours per day with a 1,000-foot setback while the same child at home might have only a 100-foot setback 16 hours per day (24 hours per day during weekends, holidays, and vacations) depending on how the parcel is zoned. Similarly, the elderly or infirm require sufficient setbacks to protect their health from cannabis emissions that include carcinogens. Whether a parcel is residential-, agricultural-, or RRD-zoned has no bearing on whether all the people who live in those homes should be protected, including children, the aged, the ill, or anyone otherwise compromised. Such people have heightened sensitivity to these impacts.

The proposed setbacks of 600 feet and 1,000 feet fail to account for the realities that Sonoma County residents experience. The map depicts odor complaints for a one-acre cultivation operation during autumn 2023 at 2274 Wellspring Road, Santa Rosa, in Bennett Valley. The cultivation site is the red square and the complaints are black dots. Each concentric circle is 1,000 feet. A home on Matanzas Creek Lane, about 2,500 feet from the cultivation site, suffered from such awful cannabis emissions that the residents could not open their windows for weeks and thus could not use natural air conditioning to cool their home at night. They were embarrassed to have friends visit. The Penngrove neighborhood suffered so badly from unhealthy cannabis emissions that Permit Sonoma tried to shut down the cultivation in late 2023 (Attachment 1), but the Planning Commission refused to do so. There are many such examples. The County cannot approve a project with significant environmental impacts if any feasible mitigation measure or alternative is available that will substantially lessen the severity of any impact. Pub. Resources Code § 21002; CEQA Guidelines § 15126(a). We support Alternative 2 (commercial and industrial zones only) as this achieves the CEQA requirement of least impact. If

Finally, the DEIR acknowledges the cannabis emissions problem for indoor and outdoor cultivation in Impact 3.3-4, concluding “This impact would be significant.” It provides a viable solution for indoor cultivation in Mitigation Measure 3.3-4a-- “A structure containing cannabis must be equipped with a filtration and ventilation system to control odors.” Yet the DEIR fails to provide sufficient mitigation for outdoor cultivations where most problems occur. The DEIR can’t not be considered creditable and legally defensible without mitigating the problem for outdoor cultivations.

II. Crop Swaps Do Not Qualify for Ministerial Permits

The proposal would allow “crop swaps,” whereby a vineyard, apple orchard, walnut orchard, or other existing crop can be replaced with cannabis merely by way of a ministerial permit process, a permit that would exist in perpetuity. Proposed Section 26.18.115(C)(4)(h). This proposal requiring the County to issue a permit for 10 or more acres of cannabis is fundamentally misguided. It also violates CEQA. It assumes that there are no new or different environmental impacts to be analyzed when marijuana replaces an existing crop, and that no site-specific review or input from neighboring property owners or residents is warranted. It wrongly assumes that the setbacks would be sufficient with the new cannabis requirements to avoid harm to the public from cannabis emissions. Furthermore, it creates a backdoor whereby agricultural crops are eliminated and supplanted by cannabis, which is not recognized as an agricultural crop. This violates Policy AR-1e in the Agricultural Element of the General Plan that prioritizes food crop agriculture. The public should have the right to raise water usage, unhealthy cannabis emissions, traffic, and cumulative effects issues whenever a new marijuana crop is being proposed.

A. Water Supply Impacts

Central to the crop swap proposal is the notion that if the on-site water supply relies on groundwater wells the proponent of the cannabis operation can show there is “no net increase in groundwater use for all agricultural operations on the parcel.” Proposed Section 26.18.115(C)(4)(h)(8)(b). This proposal relies on a fundamental error by subsuming cannabis in the term “agricultural operations.” As noted above, legally cannabis does not qualify as “agriculture.” Setting aside that fundamental defect, almost no water monitoring data exists in Sonoma County for agricultural crops, so the “no net increase” exercise must rely on evaluating a “study prepared by a qualified professional” to make the showing, including whether the watershed is affected and whether a study of whole watershed is needed. This is not a “check the box” exercise that qualifies for a ministerial permit under CEQA. The “no net increase” determination inherently involves judgment and the exercise of discretion by a County official. The use of discretion is forbidden under *Protecting Our Water & Env'tl. Resources v. County of Stanislaus* (“POWER”) (2020) 10 Cal.5th 479, 501. Even if the water availability criteria in the proposal require the exercise of judgment only in some circumstances, the County may not make a determination of consistency with these criteria a matter of ministerial approval in all circumstances.

Underlying the proposal is the assumption that achieving no net increase on an annual basis is sufficient to protect the environment. This is false. *See* cbec Report, pp. 2-3 (submitted with

Shute Mihaly Weinberger comments). The “studies completed for the County quantify water use on an annual basis and to comply with the requirement, the study only needs to demonstrate that the annual water use of cannabis will be equal to the annual water use of the pre-crop swap agricultural use.” cbec Report, p. 2. A gallon of water consumed in April or May is not identical to a gallon of water consumed in late August, September, or October. Apples and wine grapes use much less water in late summer and fall, unlike cannabis which consumes water voraciously during those months when stream flows are most stressed. Napa County found that cannabis consumes 3.38 acre-feet per year, while vineyards use 0.2 to 0.5 acre-feet per year—between 7 and 17 times as much! *See* Shute Mihaly Weinberger letter. The California Department of Fish and Wildlife has raised this issue in comments to Sonoma County. Sonoma County’s guidelines concede that there are “specific times of the year when groundwater pumping is more likely to lead to environmental impacts (e.g., depletion of stream base flows during the dry season).” [8-2-2 Guidelines for Net Zero Groundwater Use](#). The current procedures in Sonoma County are insufficient to establish a baseline for historic water use conditions.

A crop swap from apples or grapes to cannabis would likely increase the stress on neighboring wells, riparian habitat, and the watershed during late summer and autumn. Existing groundwater use already impacts many species during late summer, including amphibians in the riparian zones and salmonids. Perpetuating the same level of use does not mitigate the continued or increased impacts. Water use needs to be evaluated on a case-by-case basis. A program EIR cannot make such a determination, and this DEIR certainly does not. Finally, as a policy matter the County should not perpetuate and encourage gluttonous outdoor cannabis grows in the face of the harm this policy inflicts on endangered and sensitive species, resulting in incalculable environmental damage for the future.

Hydrologist Greg Kamman states the following:

It is my professional opinion that the stated water source requirements under the Program are prone to masking potential impacts and they should be modified to require water supply studies that address a higher frequency (e.g., monthly) interval of seasonal groundwater withdrawals. Given such studies are more detailed and nuanced with regard to identifying potential impacts, it is also my opinion they warrant discretionary review by the County.

cbec Report, p. 3.

B. Impacts From Exposure to Unhealthy Air

As discussed in our companion comments filed separately, “The Draft Environmental Impact Report to Disclose the Adverse Health Effects of Cannabis Emissions,” cannabis fields emit large amounts of noxious and unhealthy compounds, including carcinogens and secondary pollutants such as ozone and formaldehyde. They can cause neighbors to experience harms such as nausea, headaches, vomiting, difficulty breathing, coughing, eye irritation, sore throat, and respiratory irritation. No one notices emissions from other crops grown in Sonoma County, other than perhaps to enjoy the scent of apple blossoms during spring.

Even if setbacks were to be increased substantially, cannabis emissions can be detected up to two miles away from the cultivation site. DEIR, p. 3.3-12. Unless setbacks are two miles, they would not account for all site-specific issues due to local topography, winds, local thermal inversions that trap air for days (*see* DEIR, p. 3-3-7), and similar issues. Impacts from exposure to unhealthy air need to be addressed in a conditional use permit. Any determination by a County official concerning the significance of residential exposure to unhealthy cannabis emissions would be an exercise in judgment that is forbidden under POWER.

C. Traffic and Evacuation Impacts

Cannabis cultivation generates much more traffic than vineyard or orchard operations. Cannabis traffic can result in significant adverse impacts on the County's narrow, rural roads, particularly during emergency evacuations. The crop swap proposal assumes this problem away. The DEIR failed to study this issue, and took a single number from Trinity County for outdoor cultivation instead of analyzing the hundreds of permit applications that Sonoma County has processed since 2017. It randomly selected 8.5 employees per acre of outdoor cultivation and did not mention the number of employees can be highly variable both by site and seasonally. DEIR 3-6

The 2016 Negative Declaration for the Medical Cannabis Ordinance (p. 44) indicates that a one-acre cultivation site requires 12-15 employees during peak periods. A 2020 permit application for a 1-acre cannabis operation for the Gordenker Ranch in Glen Ellen employs 12 full-time and five part-time staff during peak season. [A one-acre cultivation at 1400 Valley Ford](#) in Sonoma County employs 4 full time employees year-round plus 40 staff during the two-month harvest. Processing requires 20 other staff.

A vineyard owner in the Russian River appellation notes that her 5-acre vineyard employs 2 workers per acre for a few days in winter and spring for pruning and canopy control and 4 workers per acre for half a day in the fall (Judith Olney, pers. comm.). Two employees per acre during harvest for half a day contrasts, to put it mildly, with 44 employees per acre for a two-month harvest at the 1400 Valley Ford cannabis operation. Traffic impacts need to be assessed on a case-by-case basis and greatly exceed the "baseline" traffic that other agricultural activities in Sonoma County generate.

Moreover, cannabis harvest lasts months during peak fire season, and the DEIR pays insufficient attention to evacuation risks. This is particularly serious for large cultivation operations or clustered operations that rely on a single access road for evacuation. An evacuation plan is needed on a site-specific basis, and cannot be accomplished in a ministerial permit.

Mitigation Measure, 3.17-1c, DEIR 3-17.44, requires that all roadways comply with the Board of Forestry State Minimum Fire Safe Regulations. Many of the roads that access potential cultivation sites are too narrow to meet the 20-foot road width requirements and lack the required two separate ingress/egress roads. The regulations allow exceptions to be granted, § 1270.07, approval of which inherently involves discretion by an official. This is yet another reason why a ministerial permit process violates CEQA. Even if compliance with the State Minimum Fire Safe

Regulations requires the exercise of judgment only in some circumstances, the County may not make a determination of consistency with its criteria as a matter of ministerial approval in all circumstances.

D. Cumulative Impacts

CEQA defines cumulative impacts as “two or more individual effects which, when considered together, are considerable or which compound or increase other environmental impacts.” CEQA Guidelines §§ 15355, 15130(a). A project-specific mitigated negative declaration or a EIR must be prepared if its possible impacts, though “individually limited,” prove “cumulatively considerable.” Pub. Resources Code § 21083(b); CEQA Guidelines § 15064(i). Ministerial permits have no mechanism to analyze and consider cumulative impacts resulting from an undue concentration of cannabis cultivation sites. For that reason, issuing ministerial permits for crop swaps violates CEQA.

Attachment 2 depicts a portion of Bennett Valley where merely 10 parcels could engage in crop swaps to allow 58 acres of cannabis cultivation. This situation, which the proposal would allow, raises all issues discussed above, including cumulative impacts.

If a proposal meets the Ordinance’s criteria for ministerial approval, consistency with the EIR will be “assumed.” DEIR at 3-7. The permits never expire, so there is never an opportunity to revisit permits that cause grievous environmental harm. For this reason, any environmental impacts of these future ministerial approvals must be analyzed at the programmatic level before adoption of the Proposed Ordinance. But the DEIR does not (and cannot) programmatically assess the issues raised here with the degree of granularity that would be necessitated in such situations.

Crop swap permit applications must evaluate and mitigate cumulative impacts of water use, exposure of residents to unhealthy cannabis emissions, traffic, and evacuation impacts. Ministerial permits do not allow such evaluations and would violate CEQA. Approval of any crop swap proposal should be subject to a CEQA initial study and either a mitigated negative declaration or an EIR.

III. General Water Supply Impacts

Besides the water issues we have discussed concerning crop swaps, there are other countywide water issues that the DEIR fails to address adequately. The California Department of Fish & Wildlife has repeatedly asked the County to map the locations of endangered and sensitive species that should be protected, many of which dwell in riparian zones. These include officially impaired watersheds such as Mark West Creek, Mill Creek, Green Valley Creek, and Dutch Bill Creek. If the County did its homework and accurately mapped the location of sensitive species, it would include other watersheds such as Matanzas Creek in Bennett Valley. The best means of mitigating the significant adverse impacts of proposed cannabis cultivation on priority watersheds is to exclude all commercial cannabis activities from those areas. Hydrologist Greg Kamman agrees that Mark West Creek, Mill Creek, Green Valley Creek, Dutch Bill Creek, Bennett Valley, and Joy Road should be excluded from cannabis cultivation (cbec Report).

The County's "net zero" water use policy is faulty throughout the county, not just in "crop swap" situations. The policy perpetuates the already impaired hydrologic conditions that threaten the reproduction of rare and endangered species and prevent the restoration of habitat for endangered salmonids. cbec Report In addition, the "net zero" policy is inconsistent with the Adopted Sonoma County General Plan Water Resources Element, as the EIR fails to adequately analyze the impacts directed by the Goals and Objectives (under GP 3.2 Groundwater). The League of Women Voters of Sonoma County comment letter (July 12, 2025) discusses this issue in depth.

IV. Rural Farm Stands and Cannabis Events Are an Invitation to Crime and DUIs

The proposal to allow mini-dispensaries and cannabis tasting and sales at events at rural cultivation sites invites an increase in crime to Sonoma County's pastoral and peaceful countryside. Our report "Selling Cannabis is a Magnet for Crime" (Crime Report, Attachment 3) shows that cannabis operations, have been linked to a rise in violent crime, including armed robberies of processing facilities. The fact our neighboring counties of Napa and Marin do not allow cannabis grows renders Sonoma County a focal point for these crimes. Criminals are attracted to a product that is highly valuable, compact, easy to confiscate and transport, and readily sold on the black market. The fact that transactions are in cash adds to the allure. Furthermore, all cannabis products would need to be provided by licensed distributors and be tested and inspected pursuant to state regulations.

The DEIR asserts that crime reports on cannabis operations make up only 0.02 percent of all incident reports. DEIR at 3.13-18. This is at odds with the attached Crime Report, probably because it failed to obtain information from Santa Rosa or other Bay Area counties. The DEIR assumes that criminals restrict their activities to their own neighborhoods. It also fails to consider the fact that the Ordinance could increase existing outdoor cannabis cultivation by over 14 times.

The proposed canna-tourism program caters to the failing local cannabis industry. Cultivation in Sonoma County cannot compete economically with more efficient operations elsewhere in California, and cannabis entrepreneurs hope that direct sales at farm stands and rural events will provide otherwise unattainable revenue and profits. Such activities would transform quiet neighborhoods into hotspots for crime and DUIs. Information from Public Records Act requests indicate there were 3,188 cannabis-related public safety incidents reported from five Bay Area counties and three cities during a recent four-year period. Crime Report, p. 4. Sonoma County alone accounted for 904 of the incidents, approximately 1.2 incidents per day.

Most reported crimes occurred in cities, where law enforcement tends to be prompt. The risks rise dramatically in rural areas because response times can range from 30 to 45 minutes. For that reason, rural mini-dispensaries would be easy prey to criminals who seek vulnerable targets where the risk of being identified, unsuccessful, or arrested is low. Such activities would subject neighborhoods to the types of urban crime in our Crime Report.

The Sonoma County Sherriff's Office emphasized the dangers of rural crime in its mail newsletter entitled "Update" on May 5, 2025. It included an article entitled "Theft Prevention on Farms and Ranches" that included in pertinent part the following (emphasis added):

We're sometimes lulled into complacency living in beautiful rural areas, thinking "crime doesn't happen here." But theft can happen anywhere, **especially in rural areas where criminals often look for easy targets.**

Despite security measures required by local and state laws, cannabis dispensaries are magnets for crime. Recent articles that chronicle the crimes including a burglary ring that targeted cannabis dispensaries. For example:

- [5 arrested after dispensary robbery, 2 separate chases in Cotati, Santa Rosa \(August 2024\)](#)
- [Multiple items stolen during second Santa Rosa dispensary break-in this week \(December 2022\)](#)
- [Brazen thieves target Sonoma County cannabis dispensaries \(Jan. 2023\)](#)
- [Owner Of New Oakland Cannabis Dispensary Shot Sunday Morning \(April 2022\).](#)

The presence of cannabis dispensaries not only endangers public safety but also strains local law enforcement resources. The California Highway Patrol's Santa Rosa Commander emphasized the danger (Attachment 4):

We have certainly seen an increase in violent crime in and around more rural cannabis operations. Violent crime would include armed robberies of the processing facilities which obviously puts public safety at risk as well as expends local law enforcement resources.

Cannabis also fosters homicides. Since 2012 there have been 43 homicides in Sonoma County, 10 of which were directly due to cannabis, or 23%! Crime Report, p. 4. Assuming the homicide rate mirrors the growth projected in the Cannabis DEIR, 188 cannabis-related murders will occur in the next 20 years.

There is substantial evidence that increasing participation in the cannabis industry would require expanding the existing ability of law enforcement to provide services related to potential criminal activity at cannabis sites. The DEIR fails to analyze the need for greatly increased expenditures on law enforcement and additional substations in rural parts of the county.

The proposal allows 104 cannabis events with consumption annually at rural locations near residential neighborhoods. They could occur at each site every day from Memorial Day to Labor Day and every weekend day all year. Cannabis consumption at the events and "farm stands" will encourage stoned driving, and the proposal contains no DUI safeguards. These risks are unacceptable on Sonoma County narrow rural roads, especially when [20% of traffic deaths now involve marijuana use](#).

A responsible County would, and our County should, limit all cannabis events and on-site retail to fairgrounds and industrial or commercial zones.

Napa County, a peer in agricultural prestige, recognized these very dangers and chose to ban all forms of commercial cannabis activity in its unincorporated areas to protect its core agricultural identity.

V. The Proposal Reduces Safety Standards Which Will Invite More Crime and Put the Public at Risk.

The proposed Ordinance would remove the existing requirements that outdoor cultivation areas be “screened from public view” and “not be visible from a public right of way.” Proposed County Code § 26-88-254(f)(6). It would also remove the County’s existing requirements for a site security plan, motion-sensor security cameras, security lighting and alarms, fencing locked with a Knox lock, and the prohibition on weapons and firearms at cultivation sites. Proposed § 26-88-254(f)(21).

None of the Department of Cannabis Control’s (“DCC”) regulations cited in the DEIR would apply to cannabis cultivation, but rather only to cannabis manufacturing, which occurs after cannabis is harvested. The Ordinance also does not propose any security measures to replace those it is removing; instead, the County would rely on DCC’s security regulations to ensure there would be no impact to public safety that could result in an environmental impact due to expansion of safety infrastructure.

Thus, there is a significant decrease in security measures applicable to cannabis operations under the Ordinance that the DEIR fails to analyze. Local public safety services must expand to fill the security gap, which in an era of budgetary cutbacks is unlikely to occur. For example, the DCC regulations have no restriction on visibility of outdoor cannabis cultivation from public roadways, nor do they prohibit firearms at grow sites.

The following elements individually and collectively demonstrate how the proposal puts the public very much at risk: (1) the substantial growth projected for the industry over the next 20 years; (2) allowing cannabis sales at remote cultivation sites; (3) allowing 104 events per year at potentially thousands of locations; (4) the elimination of site security plans; and (5) allowing commercial cannabis on smaller parcels with virtually no setbacks. There is no possible justification to support this aspect of the proposed Ordinance. The unavoidable conclusion is that the impact is significant and would be put the public at risk.

VI. Exclusion Zones Should Be Used for Mitigation.

For almost a decade, the County has invited neighborhoods to submit requests to be deemed Exclusion Zones, prohibiting commercial cannabis cultivation, sales, and any related activities in specified neighborhoods. Against that backdrop as well as the County’s stated objective of achieving neighborhood compatibility, we cannot understand why neither the draft Environmental Impact Report nor the proposed Cannabis Ordinance contains the phrase “exclusion zone,” except to observe it is an area of controversy. Exclusion zones would reduce the hostility between growers and rural residents whose needs and desires are obviously incompatible. Given the background to developing the revised cannabis ordinance, this seems to be insubordination and a violation of the public trust. It is also likely contrary to law because in refusing to study exclusion zones called for in the March 2022 Framework document approved by the Board of Supervisors staff apparently unilaterally revised the project proposal in the Notice of Preparation.

Permit Sonoma conducted public outreach during summer 2021, including an online survey of a variety of issues. The results indicate that 74% of residents favored creating exclusion zones. The Board of Supervisors explicitly directed Permit Sonoma to study exclusion zones and rural neighborhood enclaves in its Cannabis Program Update Framework in 2022. This was included in Notice of Preparation for the Environmental Impact Report in 2023.

During the scoping process and in response to the direction of the Board of Supervisors, the Neighborhood Coalition and several individual neighborhoods provided detailed proposals as to what areas should be studied as exclusion zones or neighborhood enclaves. Many individuals devoted countless hours to propose credible, viable areas for consideration.

Permit Sonoma was asked during the first Planning Commission hearing why exclusion zones had vanished despite the clear direction of the Board of Supervisors to study them. Staff responded that setbacks constitute exclusion zones. This makes no sense at all. It would mean that the current ordinance already has exclusion zones, and that past efforts to consider them were misguided and a waste of time. This includes Commissioner and Supervisor discussions about exclusion zones in 2016 when the original Cannabis Ordinance was adopted, as well as work by Ad Hoc committees of the Board of Supervisors in 2017 and 2018.

The Planning Commission and the Board of Supervisors can still salvage this deeply flawed process. They can follow the project proposal in the Notice of Preparation and require the establishment of exclusion zones to mitigate the health effects of cannabis emissions and protect sensitive habitats and resources. Widely employing exclusion zones will help mitigate many of the environmental impacts of the proposed ordinance, and, among other remedies such as requiring increased setbacks for all parcels is clearly a reasonable mitigation option.

VII. The Project Description and Environmental Setting are Incomplete

The project description should better describe how cannabis is grown, harvested, processed, and transported. Geo pots are the typical means of growing cannabis outdoors in Sonoma County, and the DEIR fails to describe the chemicals and additives that are used, and whether any local soils are used. Where are the materials in the geo pots disposed, and how frequently? What is the traffic impact? How many crops are harvested annually for different types of grows? What labor is needed for each phase of cultivation and harvesting for each type of grow on a per-acre basis? The DEIR cannot legally assess all of the environmental impacts without accessing, detailing, and considering this information.

The project description should analyze the amount of cannabis that is anticipated to meet State requirements for appellation of origin. Under Bus. & Prof Code § 26063(c), an appellation of origin “requires the practice of planting in the ground in the canopy area and excludes the practices of using structures, including a greenhouse, hoophouse, glasshouse, conservatory, hothouse, and any similar structure, and any artificial light in the canopy area.” The appellation issue is rendered further suspect given the wide use of geo pots for growing plants, rendering the soil provenance and any appellation irrelevant. Growers often contend that consumers prefer cannabis grown in Sonoma County, and the proposals concerning farm stand sales and events suggest that an appellation designation will improve prices. Most growers seem to use

hoophouses, artificial light, and geo pots which do not qualify. A comprehensive DEIR should provide specific and detailed information to decision makers on these issues. Thus, the project description is incomplete.

Thank you for considering and hopefully implementing our comments.

Neighborhood Coalition

Nancy and Brantly Richardson, Communications Directors

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Attachment 1. Permit Sonoma, Staff Report Penngrove (December 14, 2023)

Attachment 2. Map of Bennett Valley

Attachment 3. Neighborhood Coalition, Selling Cannabis is a Magnet for Crime (July 8, 2025)

Attachment 4. Letter from David Hoff, California Highway Patrol, to Permit Sonoma (May 14, 2024)

Attachment 1



Sonoma County Planning Commission STAFF REPORT

FILE: UPC20-0001
DATE: December 14, 2023
TIME: At or after 1:20 pm
STAFF: Ken Compton, Project Planner

SUMMARY

Property Owner: Agricola Enterprises LLC
Applicant: Natasha Khallouf/Agricola Flower and Nursery
Address: 8105 Davis Ln, Penngrove, CA 94951
Supervisory District(s): 2
APN: 047-202-033
Description: Request for a limited term, conditional Use Permit for 10,000 square feet of outdoor cannabis cultivation on a 5.46-acre parcel. This permit would allow for up to two (2) full-time employees and up to six (6) seasonal employees to serve the cultivation site. Cultivation activities would occur 24 hours a day, 7 days a week, as needed. Deliveries would be limited to 8:00am to 5:00pm, Monday through Friday. No retail sales would be permitted.
CEQA Review: Statutory Exemption: Section 15270, a project which a public agency rejects or disapproves
General Plan Land Use: Diverse Agriculture (DA 20)
Specific/Area Plan Land Use: Penngrove Area Plan
Ordinance Reference: 26-88-250 – 26-88-254;
26-92-080
Zoning: Diverse Agriculture, maximum permitted density of one dwelling per 20 acres, with Combining Districts for Valley Oak Habitat (DA B6 20, VOH)



RECOMMENDATION

The Permit and Resource Management Department (Permit Sonoma) recommends that the Board of Zoning Adjustments deny the 5-year limited term Conditional Use Permit for a commercial cannabis cultivation operation, consisting of 10,000 square feet of outdoor cultivation.

EXECUTIVE SUMMARY

Agricola Flower and Nursery requests approval for a commercial cannabis operation consisting of 10,000 square outdoor cultivation currently operating under a Zoning Permit (APC19-0003) issued by the Sonoma County Department of Agriculture, Weights and Measures (AWM) on a 5.46-acre parcel zoned Diverse Agriculture (DA).

Staff is recommending denial of this permit for the following reason:

The Board of Supervisors adoption of Ordinance No. 6245, amending the Cannabis Land Use Ordinance and increasing minimum parcel size from 5 acres to 10 acres in the agricultural zoning districts (LEA, LIA, DA), attempted to improve neighborhood compatibility through increased parcel size and distance to offsite uses. The adoption of this ordinance established a pipeline provision that allowed for the approval of projects located on substandard parcels on a discretionary, case-by-case basis as use permits, subject to their ability to demonstrate that the establishment of such commercial activity would not be detrimental to general welfare and neighborhood compatibility applicable under Code Section 26-92-080.

Cultivation on the subject parcel has been ongoing since February 2018 under an issued zoning permit and has been granted the ability to continue cultivation under the pipeline provision. This provision required that all zoning permits be renewed as discretionary use permits, provided a complete application is submitted prior to expiration of the zoning permit. To approve a conditional use, the County must find that the establishment, maintenance, and operation of the use will not under the circumstances of the particular case, be detrimental to the health, safety, peace, comfort, or general welfare of persons residing or working in the neighborhood or to the general welfare of the area. Staff has determined that the proposed project would be incompatible with the neighborhood and detrimental to the general welfare of those in the area because:

- The project is directly adjacent to at least seven offsite residences. These residential structures are located at distances that range between approximately 415 feet to 300 feet from the cultivation area. While 300 feet meets the minimum setback requirements of the ordinance, discretionary review can require greater setbacks if necessary to avoid or mitigate project impacts. The surrounding land uses are generally residential in nature with limited agricultural uses, indicating that a greater setback may be necessary to provide compatibility with the relatively high density of nearby residences. Increasing setbacks for cannabis operations can be accomplished through the relocation of the project site or reducing the proposed canopy. Due to the constraints of the location of the project site in conjunction with the proximity of surrounding residential structures, the project cannot be relocated to substantially enhance setbacks. Further, as a project proposing 10,000 square feet of canopy, the operation would already be considered a small-scale cultivation operation and any further reductions to project scale through reducing canopy would likely render the project commercially nonviable.
- Cannabis cultivation operations have the potential to be detrimental to the general welfare of the surrounding area, particularly when surrounded by residential uses. The area surrounding the subject parcel is primarily residential and the potential impacts from the proposed commercial cannabis cultivation operation are both incompatible with the residential area and have a greater potential to be pronounced by



said incompatibility. The project is located off Davis Lane, north of the community of Penngrove, and situated on an otherwise vacant lot along a street occupied by primarily residences. The introduction of a commercial use in a residential area, and particularly in the case of cannabis cultivation, is incompatible with the neighborhood and results in detrimental impacts to those living nearby. Such impacts could derive from increased vehicle traffic from employees and deliveries, visibility of the operation from offsite vantage points, odors from cannabis during the late flowering stages, and public safety due to theft. These impacts, in this particular case, would be inconsistent with the findings necessary under Code Section 26-92-080.

- Potential impacts on surrounding areas from commercial cannabis operations have the potential to be further pronounced in areas dominated by smaller parcel sizes. The minimum lot size for parcels in the DA zoning designation is 10 acres and 1.5 acres for parcels zoned Agriculture and Residential (AR), provided the parcel is not served by public water. The seven parcels adjacent to the proposed project include DA and AR and range in size from 0.56-acres to 12.21-acres with an average size of 4 acres, thereby indicating that the project parcel is in an area characterized by relatively small parcel sizes. Further, each of the seven adjacent parcels are primarily residential in character. Given that the project would be a commercial cultivation operation situated directly adjacent to and surrounded by relatively small parcels with residential uses, the impacts outlined above that could result from the regular operation of the commercial cannabis use has a greater likelihood to be more prominent and detrimental to the general welfare of the surrounding area.

PROJECT SITE AND CONTEXT

Background

The project parcel is located in unincorporated Sonoma County, northeast of the community of Penngrove and southeast of the town of Rohnert Park. The project parcel is generally undeveloped and includes fencing and a well that provides irrigation for the ongoing cultivation.

On October 15, 2018, the applicant applied for a zoning permit (APC19-0003) to authorize the cultivation of up to 10,000 square feet of outdoor cannabis canopy. The permit was issued on February 5, 2019 for a one year term. Prior to the end of business day on February 5, 2020, the expiration date, the applicant, Natasha Khallouf of Agricola Flower and Nursery, submitted a complete use permit application and was thereby subject to the pipeline provision in Ord. No. 6245 allowing projects on parcels under the new 10 acre minimum to be renewed with a discretionary permit. Cannabis cultivation is authorized to occur on the parcel under APC19-0003 until a final decision is made on the pending use permit.

Area Context and Surrounding Land Uses

Direction	Land Uses
North	Parcels zoned Diverse Agriculture (DA B6 20, VOH), East Railroad Ave, scattered residential structures and small to medium-scale agricultural uses, undeveloped pasture lands, Lichau Creek
South	Residential parcels zoned Agriculture and Residential (AR B6 2.5), Brand Lane, Davis Lane
East	Parcels zoned Diverse Agriculture (DA B6 20, VOH), Davis Lane, Vineyard on large parcel (DA B7 Z, RC50/25 RC100/50 SR VOH)
West	Relatively small parcels zoned Diverse Agriculture (DA B6 20, VOH), relatively large parcels (DA B6 30 Z, LG/MTN RC50/25 SR VOH), Petaluma Hill Road



The proposed project is located in the unincorporated community of Penngrove, northeast of downtown Penngrove and southeast of the towns of Rohnert Park and Cotati. The project site is northeast of Adobe Road, east of Petaluma Hill Road, and directly adjacent to Davis Lane and Brand Lane to the east and west respectively. The project site is situated on a flat area near the foothills of the Sonoma Mountains. Lichau Creek is located approximately 0.5 miles to the north and Willow Brook is located approximately 0.5 miles to the east. No Riparian Corridors or habitat is located on or adjacent to the project parcel.

The surrounding area is largely rural and includes a combination of residential and agricultural uses. The project site is located on an undeveloped 5.46-acre parcel accessed using a private driveway off Davis Lane. Parcels immediately surrounding the project site are generally small in size, with residential structures and barns. Agricultural operations, including dairy and vineyard, are located on the opposite sides of Davis Lane and East Railroad Avenue. Conversely, residential densities generally increase to the south and west of the project site.

See also Attachment 2. Aerial Map; 3. Vicinity Map; 4. Land Use Map; 5. Zoning Map.

Significant Applications Nearby

Within a two-mile radius of the project site, there are three other parcels with issued or approved cannabis permits. One of these is a zoning permit (APC20-0074) issued by AWM and located at 8270 Petaluma Hill (APN 047-101-019), approximately 0.55 miles west of the proposed project on a parcel zoned DA. The remaining two are located approximately 1.4 miles to the north along Roberts Road; 2275 Roberts Road, Penngrove (UPC17-0090, APN 047-122-025) which is a cannabis operation with an issued use permit that includes mixed light, indoor, and outdoor cultivation, but is currently in a phased plan with authorization to cultivate 10,000 square feet of outdoor cannabis on a 15-acre parcel zoned DA, and 2425 Roberts Road, Penngrove (UPC17-0021, APN 047-122-027) which is an approved use permit for indoor and mixed light cultivation operating under the County's Penalty Relief Program (PRP) on a 6.74-acre DA parcel. UPC17-0021 was also a project subject to the pipeline provision following the amended Ordinance, and at a public hearing conducted on November 19, 2020, was considered and approved by the BZA. In this specific case, this parcel was immediately surrounded by more agricultural uses and undeveloped space, with the four residential uses located within 500 feet to the north, the closest of which is approximately 360 feet from the cultivation perimeter. Despite the substandard parcel size and proximity to residents, the applicant received approximately 40 letters of support from neighbors and the community prior to their 2020 BZA hearing. The amount of support received for this project can be attributed to a combination of factors including the lack of outdoor cultivation that would generate more odor during late flowering periods as well as the substantial lack of multiple and immediately adjacent offsite residences.

Access

The site is accessed by a private driveway located on APN 047-202-034 and accessed off Davis Lane. See Attachment 7. Site Plan. The private driveway is an unpaved dead-end road that is generally 12 feet in width. Davis Lane is a county-maintained road that extends northeast from the unincorporated community of Penngrove, with connection on Adobe Road 1.15 miles to the south and East Railroad Avenue approximately 1000 feet to the north. Davis Lane ultimately ends on APN 047-241-047, northeast of the project parcel.

Wildfire Risk

According to the Wildland Fire Hazard Area map in the Sonoma County General Plan, the project is located in the Local Responsibility Area and Moderate Fire Hazard Severity Zone. Wildfire risks are not anticipated for the



proposed project due to location and available emergency access from Davis Lane and is further reduced by the limited number of proposed employees that would be onsite at any given time.

Water/Wastewater/Utilities

The project parcel, in addition to most of Penngrove, is located in a Class 3 Marginal Groundwater Area and the Petaluma Valley groundwater basin, which is defined as a medium priority basin by the California Department of Water Resources Bulletin 118.

Water for irrigation is provided by an existing well located on the project parcel. Water is drawn from the well and stored in holding tanks near the cultivation areas, where it is applied as needed during the outdoor cultivation season.

Employee restroom facilities are provided using portable ADA bathrooms and serviced by a licensed contractor.

Energy use for the outdoor cultivation is minimal and primarily consists of security features and well water pumping. The site has existing utility lines for electrical power and energy would be sourced from Sonoma Clean Power EverGreen 100% renewable power.

Agricultural Conditions/Land Encumbrances/Contracts

The project parcel is not subject to a Land Conservation (Williamson Act) Contract. The project site is not designated as farmland, such as Prime or Unique Farmland. The project site is designated as Other Land by the California Department of Conservation's Farmland Mapping and Monitoring Program.

PROJECT DESCRIPTION

The project proposes a commercial cannabis operation consisting of 10,000 square feet of outdoor cultivation. The cultivation would occur within a fenced perimeter located in the center of an undeveloped 5.46-acre parcel. See Attachment 7. Site Plan. As discussed above, outdoor cannabis cultivation is currently occurring on the project parcel on a seasonal basis under an issued zoning permit (APC19-0003) from AWM.

The project site currently includes infrastructure related to agricultural production including fencing, onsite wells, and small structures for material storage and waste. The proposed project would include further improvements of the onsite infrastructure through the extension of a gravel road into the center of the project parcel, the addition of a fire safe turnaround, and additional perimeter fencing and screening vegetation.

The project is located on the north side of the unincorporated community of Penngrove and southeast of the cities of Cotati and Rohnert Park, in a flat area near the foothills of the Sonoma Mountains. The subject parcel is dominated by ruderal California grasses and forbs and does not contain any sensitive habitats such as wetlands or streams. Though the parcel includes zoning for a Valley Oak Habitat (VOH) Combining District, no Valley Oaks are located on the parcel. The applicant proposes landscaping of native trees and flowers near the cultivation fence line to better screen the operation. Other proposed activities on the project parcel would include the construction of a small livestock pen, planting of wild blackberries and fruit trees, and a flower, herb, and vegetable production area.

The cannabis operation would employ up to two full-time employees and up to six seasonal employees during the peak harvest season. Outdoor cultivation activities would be conducted seven days a week, 24-hours a day as needed, but would primarily occur between the hours of 7:00 AM to 7:00 PM. Deliveries and shipping would



be limited to the hours of 8:00 AM to 5:00 PM, Monday through Friday. An ADA compliant portable restroom would be located on site for employees and serviced by a licensed waste removal contractor for disposal.

Project History

The table below summarizes key project milestones and events.

Date	Project Event/Milestone
10/15/2018	Application submitted for Zoning Permit APC19-0003
10/16/2018	BOS Adopts Ord No. 6245 Amending Cannabis Ord and increasing min lot size
02/05/2019	AWM Issues Zoning Permit APC19-0003
02/05/2020	Application UPC20-0001 submitted and deemed complete for processing
03/12/2020	Department and agency referral sent
03/12/2020	Early Neighborhood Notification sent to residents within 1000 feet
12/04/2023	Public Notice for BZA Hearing posted and mailed
12/14/2023	Public hearing conducted with the BZA

General Plan

The subject property has a General Plan Land Use designation of Diverse Agriculture (DA), with a 20-acre minimum, which is an agricultural land use category intended to preserve lands that contain soils and have climates suitable for small acreage and part time farming activities. This land use category further acknowledges that agriculture may not be the principal use of the landowner, but that residential uses and further intrusion should be limited through policies laid out in the General Plan. The following General Plan policies are applicable to the project:

AGRICULTURAL RESOURCES ELEMENT

Policy AR-4a: the primary use of any parcel within the three agricultural land use categories shall be agricultural production and related processing, support services, and visitor serving uses. Residential uses in these areas shall recognize that the primary use of the land may create traffic and agricultural nuisance situations, such as flies, noise, odors, and spraying of chemicals.

OPEN SPACE AND RESOURCE CONSERVATION ELEMENT

Policy OSRC-7m: Designate important valley oak habitat areas, reevaluate current designations, and apply a Valley Oak Habitat combining district zoning that requires adequate mitigation for trees removed and monitoring of replacement tree survival.

Policy OSRC-7o: Encourage the use of native plant species in landscaping. For discretionary projects, require the use of native or compatible non-native species for landscaping where consistent with fire safety. Prohibit the use of invasive exotic species.

WATER RESOURCES ELEMENT



Policy WR-2d: Continue the existing program to require groundwater monitoring for new or expanded discretionary commercial and industrial uses using wells.

Policy WR-2e: Require proof of groundwater with a sufficient yield and quality to support proposed uses in Class 3 and 4 water areas. Require test wells or the establishment of community water systems in Class 4 water areas. Deny discretionary applications in Class 3 and 4 areas unless a hydrogeologic report establishes that groundwater quality and quantity are adequate and will not be adversely impacted by the cumulative amount of development and uses allowed in the area, so that the proposed use will not cause or exacerbate an overdraft condition in a groundwater basin or subbasin.

Area Plan

The subject property is located within the Penngrove Area Plan, which encompasses the unincorporated community of Penngrove and extends north to Valley House Drive, south to Corona Road in Petaluma, east to the foothills of the Sonoma Mountains, and west to Meacham Hill. The priorities laid out by the Area Plan include preserving small-town lifestyles, accommodating rural living while maintaining agricultural uses, mitigating traffic impacts, and preserving scenic qualities. No applicable policies from the Area Plan were identified for the proposed project.

Zoning

The project site is zoned Diverse Agriculture with a residential density of 20 acres per dwelling unit and a Combining District of Valley Oak Habitat (DA B6 20, VOH).

The table below summarizes the development standards that apply to the site as outlined in the Sonoma County Zoning Ordinance, the existing and proposed development, and whether the project is consistent with the Zoning Ordinance.

Standard	Ordinance	Existing Condition	Proposed Project
Land Use	Diverse Agriculture	Cannabis cultivation operating under APC19-0003	Cannabis cultivation allowed with Use Permit under Sec. 26-88-250
Permitted building intensity and development criteria – Diverse Agriculture Sec 26-06-040			
Lot Size	10 acres	5.46 acres	No change; consistent as existing substandard parcel
Front Setback	30 ft	80 ft	No change; consistent
Side Setback	10 ft	80 ft	No change; consistent
Rear Setback	20 ft	75 ft	No change; consistent
Lot Coverage %	23,785 square feet	0 square feet	No change; consistent
Consistency with Cannabis Land Use Ordinance – Sec 26-88-250			
Cannabis Cultivation (Sec 26-88-254)	Cultivation permit not to exceed 1-acre cultivation per operator	10,000 square feet outdoor cultivation	No change; consistent
Sensitive Use Setback	100 ft from property lines 300 ft from nearby residences	100 ft to closest property line 300 ft to closest residence	No change; consistent



	1000 ft from parks, schools, treatment facilities	1 mile to nearest school (Penngrove Elementary) 1.85 miles to nearest park (Magnolia Park)	
Minimum Parcel Size	10 acres	5.46 acres	Not Consistent; See discussion under Pipeline Provision and Neighborhood Compatibility

ANALYSIS

General Plan Consistency

The project parcel has a General Plan Land Use designation of Diverse Agriculture (DA), which is intended to preserve lands where soils, climate, and location support agricultural uses while recognizing that agriculture may not be the principal activity of the landowner. The scale of DA parcels lends themselves best to the combination of residential and small-scale agricultural uses while still maintaining limits on overall residential density.

Discretionary projects for the commercial cultivation of cannabis are an allowed use in the DA land use designation, subject to conformance with the policies and objectives of the Sonoma County General Plan. The proposed project is consistent with the goals and policies of the DA Land Use designation as it proposes to cultivate up to 10,000 square feet of outdoor cannabis, representing approximately 4% of the total parcel, within an existing fenced area. This preserves the remainder of the parcel for other compatible agricultural activities or supporting uses and does not propose the construction of additional permanent structures that would result in visual impacts to the rural character of the land.

As identified in Section Analysis – General Plan, the proposed project is subject to General Plan Policies AR-4a, Policy OSRC-7m, Policy OSRC-7o, Policy WR-2d, and Policy WR-2e. No inconsistencies were identified with the project, as proposed, and the above General Plan policies.

Zoning Consistency

The project parcel has Diverse Agriculture (DA) zoning, which is intended to enhance and protect lands where suitable soil, climate, and location allow for small-scale intensive farming and part-time farming activities. In the DA zones, residential densities are intended to be limited to prevent the intrusion of residential uses into areas most suitable for agricultural production.

Cannabis cultivation is an allowed use in DA zoned parcels with a Use Permit. The parcel has a Valley Oak Habitat (VOH) combining district; however, no Valley Oaks are located on the project parcel or in the vicinity of the proposed project site. No other combining districts, such as Riparian Corridor (RC), Biotic Habitat (BH), or Scenic Resources (SR), apply that would further limit the developmental standards of the parcel beyond the base zone requirements.

As summarized in the above Zoning Table, while all setbacks and development criteria are met by the proposed project, the project is subject to a pipeline provision for consideration of approval. Under this, the project must be processed as a use permit, which requires additional staff analysis to confirm that, with all reasonable satisfaction, the operation of the use will not be detrimental or injurious to residents of the neighborhood or the



general welfare of the area. See discussion below in Section Analysis – Pipeline Provision and Neighborhood Compatibility.

General Use Permit Findings

On October 16, 2018, the Board of Supervisors adopted an Ordinance that increased minimum parcel size for all commercial cannabis cultivation from 5 to 10 acres in the agricultural zoning districts of LEA, LIA, and DA. The intent of this change was to enhance neighborhood compatibility because it was found that often cannabis cultivation on smaller parcels had more pronounced negative impacts on neighboring parcels and the immediate area. In recognition that some small parcels may be suitable to accommodate cannabis cultivation, a “pipeline provision” was established that allowed applications in process or operations with a ministerial zoning permit to continue provided there was site specific review to ensure neighborhood compatibility and reduction of offsite impacts. Compatibility could be evaluated by factors such as proximity to and density of offsite residential uses, surrounding parcel sizes, or project specific designs to enhance compatibility with the surrounding area.

Requiring a use permit for all projects on undersized parcels allows for site specific review and requires the County to make certain findings (SCC 26-92-080(a)):

In order to grant any use permit, the findings of the board of zoning adjustments shall be that the establishment, maintenance or operation of the use or building applied for will not under the circumstances of the particular case, be detrimental to the health, safety, peace, comfort or general welfare of persons residing or working in the neighborhood or to the general welfare of the area.

In the case of this specific project, staff recommends denying the project because it is likely to be detrimental to neighboring properties and the general welfare of the area, because:

- The project parcel is situated north of the unincorporated community of Penngrove and is located along Davis Lane and Brand Lane at the transitional point where zoning changes from Agriculture and Residential (AR) to Diverse Agriculture (DA). Subsequently, the project site is situated directly adjacent to lands designated for primarily residential uses, which the Board of Supervisors has determined to be an incompatible area for commercial cannabis cultivation.
- The project parcel is situated in such a way that it is entirely surrounded by small parcels that are predominantly residential in nature. The project is located on a 5.46-acre parcel and shares a boundary with seven parcels that vary in size between 0.56-acres to 12.27-acres, and average 4 acres overall. While parcels beyond these adjacent neighbors are, in some cases, low density and largely agricultural in character, parcels to the south of the project site are both zoned AR and maintain residential zoning continuing south toward Adobe Rd. Commercial cannabis, while agricultural in nature, is defined as a commercial use by Sonoma County. Locating a commercial operation within an otherwise residential setting has the propensity to generate nuisances including increased vehicle traffic, noise from employee vehicles, degradation of the existing visual character due to factors such as perimeter fencing required for securing the cannabis cultivation area, and potentially objectional odors, primarily during late flowering and harvest periods, from the cannabis cultivation. The relatively small average parcel size of surrounding properties increases the number of residences that could be subjected to potential impacts from the operation and further increasing the likelihood that the project would result in an overall degradation of the general welfare of surrounding occupants.

- Setback distances outlined in County Code Section 26-88-254(f)(6) require that outdoor cannabis canopy not be located within 300 feet of offsite residences and business structures. The project would cultivate canopy as close as 300 feet to the nearest offsite residence, with the average setback distance between the proposed project and nearby dwellings measured at approximately 355 feet. This meets the minimum requirements set forth by County Code, however as a use permit the project must demonstrate compliance with general use permit findings (SCC 26-92-080(a)). In this particular case, the relatively large number of residences (7) just outside that minimum setback poses issues in finding that the proposed project would be harmonious with adjacent land uses and achieve neighborhood compatibility. As mentioned above, the commercial operation would be an outlier in an otherwise residential area, bringing with it the nuisances caused by vehicle traffic and noise, detrimental visual impacts, security, and odors. Said issues are heightened by the relative proximity of offsite residences on surrounding parcels. The project parcel, as well as four of the seven surrounding residential parcels, maintain partial to exclusive access to their property through a shared, dead end access road off Davis Lane. While traffic for the project may not be considerably large, locating a commercial use in proximity to multiple residences has the potential to both impact access along the private road for nearby occupants and result in increased noise from vehicle traffic. This proximity also has a greater potential to result in degradation of visual character for the surrounding area, particularly through security fencing to secure the cultivation area. This fencing, while required by County Code for site security, would result in a substantially more prominent visual impact due to the relatively small distance to offsite uses. Further, the proximity to immediately adjacent residential structures can result in heightened security risks to offsite occupants. Given that the parcel is predominantly undeveloped, there are no structures or consistent onsite presence to deter criminal activity. In conjunction, the lack of notable onsite presence result in an operation with ownership that is difficult to delineate from nearby residential structures, increasing risk for potential theft or property damage for offsite residences.
- Offsite odor impacts for the operation may be substantially detrimental to the surrounding area. Cultivation for the project would be limited to outdoor cultivation under this use permit, the odor impacts of which are more difficult to mitigate than comparable mixed light or indoor cultivation operations that utilize ventilation, fans, or other similar methods to reduce escaping odors. Outdoor cultivation odors are mitigated by a number of factors including vegetation and topography, however the primary mitigation for such odor impacts is through locating cultivation operations on larger sized parcels, hence the amendment to require a 10-acre minimum parcel size. Larger parcel sizes allow for greater dissipation of potentially objectionable odors before they reach sensitive receptors on offsite properties. As mentioned above, the project site is substantially surrounded by residential uses that are located within relatively close proximity to the cultivation area. Further, this site is located in an area of Sonoma County characterized by relatively flat grasslands, which does not provide natural screening, vegetative buffers, or topographic features that could serve to drive odors away from sensitive receptors or reduce their potency. Due to the combination of these factors, staff finds that the odor from the use would be detrimental to the comfort and general welfare of people in the area.

CEQA DETERMINATION

Staff has determined that the project is not subject to the California Environmental Quality Act (CEQA) pursuant to Section 15270(a), Projects Which Are Disapproved, as CEQA does not apply to projects that are denied or rejected by a public agency.



Sonoma County Permit and Resource Management Department
2550 Ventura Avenue Santa Rosa CA 95403-2859 (707) 565-1900
www.PermitSonoma.org



NEIGHBORHOOD/PUBLIC COMMENTS

Twenty written comments were submitted to Permit Sonoma as of December 4, 2023 from seven individuals primarily consisting of neighbors adjacent to the proposed project. The comments received voiced opposition to the project and expressed concerns regarding a number of issues including: 1) Visual aesthetics from offsite property lines, 2) Traffic along the shared access road serving the project site, 3) Refuse and materials loosely stored onsite that bears the potential of polluting neighbor yards, 4) Previous violations on the parcel for storage of travel trailers and construction of unpermitted hoop houses, 5) Concerns that the applicant will not maintain compliance with County Code regarding security measures and required setbacks, 6) Neighborhood safety due to proximity, 7) Odor impacts to neighbors, 8) Lack of neighborhood compatibility in a residential area, and 9) Failure to preserve peace, comfort, and general welfare for the community.

Potential environmental impacts (e.g., water quality/pollution, geology, cumulative impacts) have not been fully evaluated as staff are not recommending approval of the project. If the Board of Zoning Adjustments chooses not to deny the project, additional permit processing would be needed and staff would, at that point, make the appropriate determination for environmental review in compliance with CEQA and bring the project back for reconsideration by the BZA.

Staff recommends denial for the reasons discussed above. The intent of the amended ordinance was to help to ensure commercial cannabis cultivation was compatible with the surrounding neighborhood and reduce impacts to neighboring properties. Issues regarding the compatibility of the project with the surrounding area were raised by neighbors in comments received as early as 2020 when the use permit application was initially accepted, and neighborhood notification was sent. The comments have been primarily submitted by neighbors that live adjacent to the operation and mostly describe how the current operation has negatively impacted residential uses in the area, which further supports staff's analysis that the project is not compatible. Given the whole of the record, staff finds that the operation of the project on this non-conforming parcel would be detrimental to the health, safety, peace, comfort, or general welfare of persons residing or working in the neighborhood or to the general welfare of the area and therefore cannot make the necessary use permit findings under County Code Section 26-92-080.

RECOMMENDATIONS

Staff Recommendation

Staff recommends that the Board of Zoning Adjustments deny the request for a five-year limited term Conditional Use Permit for 10,000 square feet of outdoor cannabis cultivation.

ATTACHMENTS

1. Resolution
2. Aerial Map
3. Vicinity Map
4. Land Use Map
5. Zoning Map
6. Proposal Statement
7. Site Plan
8. Public Comments Received Prior to 10-30-23

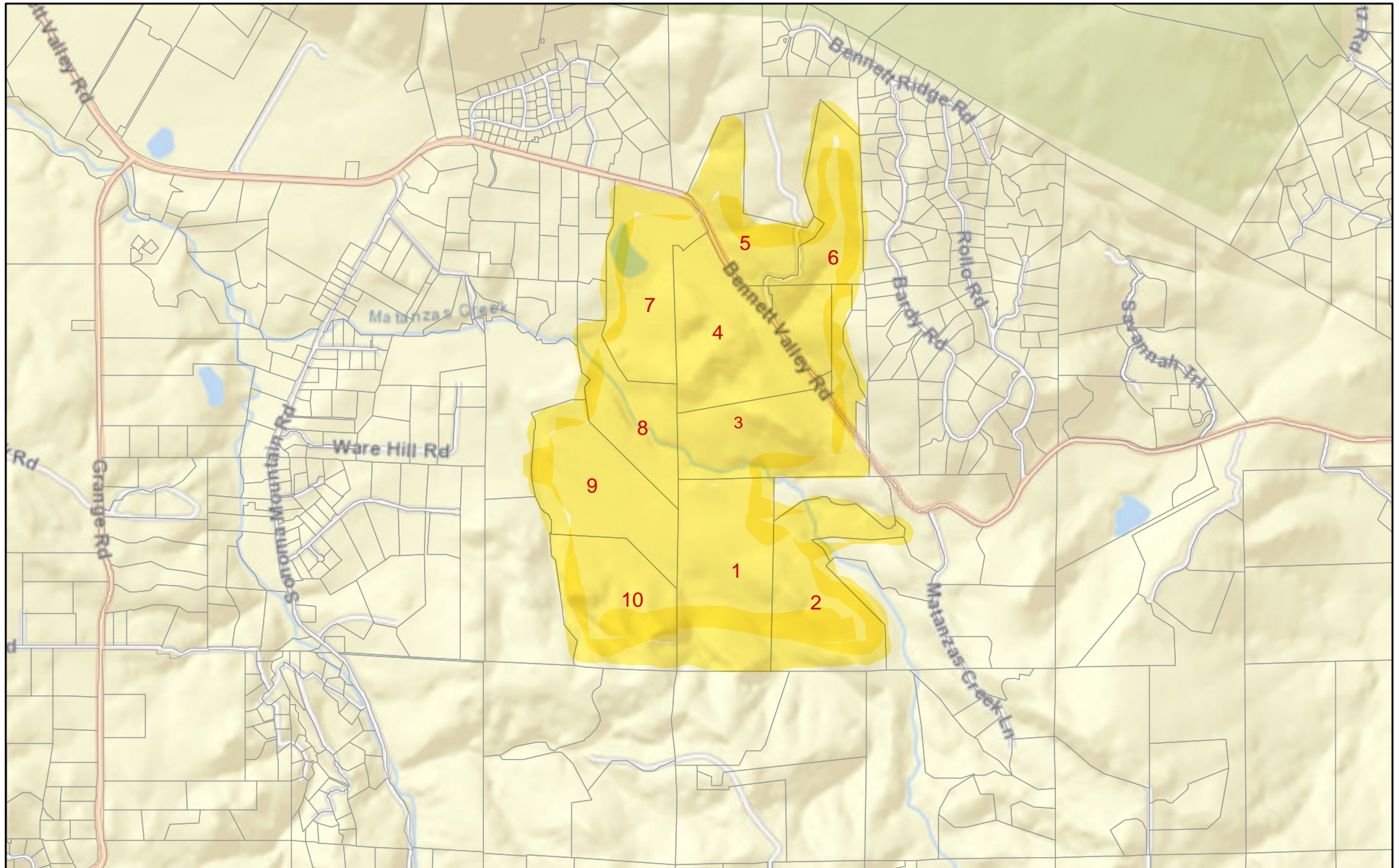


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Attachment 2

Permit Sonoma: Zoning & Land Use

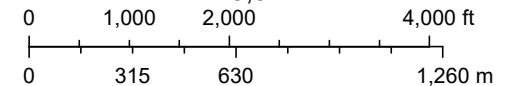


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 Parcel

055-150-001	80 acres #1
055-150-016	67 acres #2
055-010-030	60 acres #3
055-010-031	65 acres #4
055-010-032	41 acres #5
055-010-037	41 acres #6
049-010-081	60 acres #7
049-020-035	41 acres #8
049-020-017	64 acres #9
049-020-032	61 acres #10

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County of Napa, Sonoma County, Bureau of Land Management, Esri, HERE, Garmin, INCREMENT P, NGA, USGS

Permit Sonoma

County of Sonoma GIS Central, CalFire | The official Assessor Parcels reside with the Clerk-Recorder-Assessor Office in the Assessor Map Books.

Attachment 3



July 8, 2025

SELLING CANNABIS IS A MAGNET FOR CRIME

“We have certainly seen an increase in violent crime in and around more rural cannabis operations. Violent crime would include armed robberies of the processing facilities which obviously puts public safety at risk as well as expends local law enforcement resources.”

-- Commander, Santa Rosa Area, California Highway Patrol¹

Summary: This report discusses the increase in violent crime associated with cannabis operations, particularly in rural areas. It argues against Sonoma County’s proposed ordinance, which would allow retail cannabis sales, consumption and events at rural cultivation sites, citing concerns over crime, public safety, and inadequate law enforcement response times. The report also references police and sheriff reports from Bay Area counties showing the frequency of cannabis-related crimes, suggesting that allowing such activities in rural areas would attract crime and endanger communities.

Background: Sonoma County is in the process of updating its Cannabis Ordinance that proposes to allow “incidental retail sales” of cannabis at rural cultivation sites. The County also proposes to allow cannabis events, with tasting and sales, at rural sites. If approved, quiet neighborhoods countywide may experience a crimewave.

Robberies at cannabis operations, including at dispensaries protected by armed security guards, are often in the news.² Any Google search reveals that robberies are common in dispensaries in Santa Rosa and throughout the Bay Area.

¹ Email from Dave Hoff, Captain Commander, Santa Rosa Area, California Highway Patrol, to Haleigh Frye, Permit Sonoma (May 14, 2024).
<https://share.sonoma-county.org/link/VA0uzG8XkMQ/Item%201%20-%20UPC19-0012/Att.%2016%20UPC19-0012%20Public%20Comment%20Received%20Before%209.12.2024.pdf>

² See, e.g., [Police: 5 arrested after dispensary robbery, 2 separate chases in Cotati, Santa Rosa](#), Santa Rosa Press Democrat August 9, 2024); [Multiple items stolen during second Santa Rosa dispensary break-in this week, Santa](#)

One of Permit Sonoma’s primary goals for this ordinance update is to “enhance neighborhood compatibility.” Neighborhood compatibility would be seriously undermined, not enhanced, if retail sales of cannabis is allowed at rural cultivation sites located far removed from law enforcement. Rural mini-dispensaries would be very inviting to criminals and would subject neighborhoods to the types of urban crime being reported to law enforcement that average 1.2 incidents per day in Sonoma County.

The Neighborhood Coalition advocates for sustainable, environmentally sound, and neighborhood-compatible cannabis policies in conjunction with education of the public on the health and safety impacts of cannabis use. We have quantified the frequency of crime associated with cannabis activities, especially sales, in this report. Our information was provided by city and county agencies in their responses to Public Records Act (PRA) requests.

Crime Report Findings: The data from our PRA requests clearly illustrate that cannabis-related crime is rampant in the Bay Area, both in cities as well as unincorporated areas. Cannabis is highly valuable, compact, easy to confiscate and transport, and readily sold on the black market. Besides the risk inherent in marketing a valuable product, cannabis operations ~~typically~~ maintain significant cash on hand, increasing their value as targets for crime.

Despite the security required by local and California law, the crime reports show cannabis dispensaries are magnets for crime. This is a dangerous and potentially deadly environment for operators, law enforcement, and the innocent public located at or near these establishments. As highlighted in Santa Rosa, most reported crime incidents occurred at dispensaries, many of which are near residential neighborhoods.

A cannabis mini-dispensary located at a rural cultivation site would be much more vulnerable than an urban dispensary and would constitute an open invitation for robbery. Rural cultivation sites are typically far removed from law enforcement, with sheriff response times typically 30-45 minutes. Criminals prefer exploiting a soft underbelly because the risk of being identified or arrested is low. There is no justification for the Board of Supervisors authorizing this kind of danger into rural areas.

Methodology: The Neighborhood Coalition undertook two initiatives to understand the public safety risk associated with cannabis:

[Rosa Press Democrat \(Dec. 15, 2022\)](#); [Brazen thieves target Sonoma County cannabis dispensaries, Santa Rosa Press Democrat \(Jan. 19, 2023\)](#); [Owner Of New Oakland Cannabis Dispensary Shot Sunday Morning, Patch \(Apr 25, 2022\)](#).

Initiative 1 - **Cannabis Related Incidents:** During early 2024, the Neighborhood Coalition submitted PRA requests to the nine counties in the Association of Bay Area Government, and to five cities: Santa Rosa, Napa, Richmond, Oakland, and Berkeley (San Francisco is both a city and a county and is deemed here to be a county).

Our requests sought the number of law enforcement reports related to cannabis criminal activities since 2020. Our initial PRA requests were phrased as follows:

We want to learn the number and types of criminal activities such as break-ins, robberies, burglaries, etc. that have occurred at commercial cannabis operations.

We request that you provide records of all reports of criminal activity, or potential criminal activity, at each commercial cannabis operation within your jurisdiction, including dispensaries, cultivation sites, manufacturing sites, retail delivery, and distribution operations. We request these records beginning January 1, 2020 to today.

Five counties of the nine Bay Area counties and four of the five cities responded with pertinent information. Marin, Napa and Santa Clara counties stated that they lack commercial cannabis operations within their jurisdictions, and therefore have no information. Contra Costa County responded that it cannot search its database without a suspect name, victim name, or police report number, to which in turn we provided a list of dispensaries, but still received no data. Oakland responded that it needs a list of dispensaries for a search. After we provided such a list, Oakland respond they would not provide information until October 2024. The City of Richmond responded that it needs a list of dispensaries, which we provided and Richmond then provided data for three dispensaries. San Mateo County and Alameda County requests were handled by their Sheriff departments, who responded only for the areas they service, which is less than 20% and 9% of the population respectively, as most of the residents and dispensaries are within city boundaries.

Initiative 2 – **Cannabis homicides:** We sent a PRA to the Sonoma County Sheriff in August 2018 requesting the number of Cannabis homicides since 2012. A second PRA was sent June 14, 2025 requesting an update.

Results:

Initiative 1 - **Cannabis Related Incidents:** The counties and cities maintain records differently. Some provided very complete information, while others appeared to supply the minimum information required by law. Most records were redacted to avoid disclosure of sensitive or personal information. In most cases, the

specifics of the events were not reported, only that the law enforcement responded to a call.

From a macro perspective, the five counties and three cities that responded collectively reported 3,188 cannabis-related public safety incidences during a 4.25-year period (Attachment 1). This calculates to 756 incidents per year or approximately **one incident every 12 hours**. This result is an understatement of the true level of criminal incidences related to cannabis. Had we sent PRAs to all 111 cities within ABAG the number of law enforcement reports would increase dramatically. If Oakland had responded within the time required by law, the number of reported incidents would likely be much higher.³

Santa Rosa (982 incidents) and Sonoma County (904 incidents) seem to be more diligent than other jurisdictions in flagging cannabis-related incidents in their databases. This is on average 4 incidents/week in each of Santa Rosa and the County, or 1.2 incidents per day in the entire County. In Santa Rosa, eight of the ten most common locations that reported cannabis crime are dispensaries (Attachment 2).

Initiative 2 – Cannabis homicides: The PRAs are for just the areas covered by the Sheriff’s office, or the Unincorporated areas of Sonoma County, Town of Windsor, and City of Sonoma. The results show 43 total homicides since 2012, 10 murders were directly due to cannabis, or 23%! Further the 2018 PRA reported 22 Home invasions over 6 years. (Attachment 3)

Assuming the homicide rate mirrors the growth projected in the Cannabis DEIR, 188 cannabis related murders will occur through 2044.

Independent Studies Confirm the Risks: [An analysis of Los Angeles Police Department data](#) shows “The past nine years have shown an increase in reported crimes at dispensaries overall,” including a 10% increase between 2018-2019. [Another study of Dispensaries and Neighborhood Crime in Denver Colorado](#) found “Both types of dispensaries (medical and recreational) are associated with statistically significant increases in rates of neighborhood crime. Another study of [Dispensaries in Denver Colorado](#) found “the density of marijuana outlets in spatially adjacent areas was positively related to property crime in spatially adjacent areas over time. Further, the density of marijuana outlets in local and spatially adjacent

³ See, e.g., [Bay Area Cannabis Mayhem: 175 Shots Fired, Products Worth Millions Stolen](#), Cannabis Business Times (Dec. 3, 2021); [Undercover Oakland police officer fatally shot responding to burglary at cannabis business, San Francisco Standard](#) (Dec. 29, 2023).

blocks groups was related to higher rates of marijuana-specific crime.” In July 2023, [Santa Rosa police responded](#) to burglaries at 2 dispensaries minutes apart. In March 2024, in Pleasant Hill, a man killed another during a [dispensary delivery](#). In December 2023, an [Oakland police officer was fatally shot](#) responding to a burglary at a cannabis business. The Los Angeles Times regularly reports on cannabis related crime, include a [January 2024 article](#) of a massacre that killed six in Southern California. As reported by MJBizDaily in April 2023, cannabis operators acknowledge these risks: “[As marijuana break-ins skyrocket in California, business owners take action](#).” In February 2023, the Press Democrat reported “[Gathering precipitated by string of burglaries, armed robberies, Pot dispensary owners talk security with police](#).” On January 27 2023, the Press Democrat reported “Employees of a Willits medical consultancy reported Sunday that five men, armed with guns, stole between 40 and 50 pounds of marijuana from the business.”

On December 14, 2022, [the Press Democrat reported](#) “A group of individuals who broke into a Santa Rosa building Tuesday morning and stole multiple cannabis-related items had attempted to gain entry by crashing a vehicle into a warehouse door.” And the latest violent cannabis driven crimes, reported in the [Press Democrat on August 9, 2024](#) of 5 arrested after dispensary robbery, a dispensary employee physically assaulted and robbed, a suspect physically confronted an officer, 2 separate high speed car chases, ending with the suspects armed, fleeing from their cars on foot into a residential neighborhood before being apprehended in an innocence family’s yard. On Feb 28,2025 [KRON reported](#), “Four people were arrested after burglarizing a marijuana dispensary that led to a high-speed crash, according to the Santa Rosa Police Department.”

On March 4, 2025 the [DCC released their annual crime report](#) stating they have been involved in “1,400 operations.... seized 632 firearms, and arrested 733 individuals.... 105 locations were red tagged for code violations, including improper electrical wiring, mold, and illegal chemical use, seized over 2.2 million pieces of illegal cannabis packaging designed to target children...”

Current Sonoma County Plan and Risks: Sonoma County’s updated cannabis ordinance will increase crime. The ordinance is proposing to:

- Allow cannabis events with consumption at rural locations near residential neighborhoods. Up to 104 events would be allowed per

year/per site, or every day from Memorial Day to Labor Day or Saturday and Sunday! And this is PER Site! The County proposal contains no DUI safeguards for the public.

- Allow retail sales at rural cultivation sites. These mini dispensaries are easy targets for violent crime given there is no reasonable means to secure these retail sites (staff cannot be armed), the product has high value and requires cash payments, and law enforcement cannot respond in a timely manner (i.e.: 30–45-minute response time). These rural sites are typically located near rural residential neighborhoods which will put these families at risk (i.e.: stray gun fire, car accidents, wrong location targeted, impaired driving...).
- Allow cannabis processing on rural sites. The cannabis product at this stage is an easy target for criminal activity given that it is highly processed and in its smallest form while being extremely valuable. These sites are relatively low risk to criminals since they are located in remote sites, yet close enough to rural neighborhoods to put families at risk.
- Allow more than 65,753 acres of rural land to host events, process cannabis and sell retail on minimum five-acre parcels with only 100 ft setbacks to any neighbor.

Demands: The Neighborhood Coalition is urging Sonoma County to not allow the retail sale or consumption of cannabis at any rural site, including cultivation sites, not allow our agriculturally zoned lands to turn into commercial cannabis processing plants and event centers.

There are no adequate measures to secure these sites or to protect the growers, their customers and innocent residential neighbors who live nearby.

Furthermore, it is well documented that [cannabis consumption impairs driving for several hours after consumption](#), there is [no safe level of marijuana for driving](#) given [20% of traffic deaths involve marijuana](#) use.

Any such activities should occur in urban industrial areas where there is adequate infrastructure to support public safety (secure buildings, parking, taxi service, police, fire, paramedic service, etc.).

Attachment 1

Recap of PRA responses of Cannabis related crime incidents				
<u>Jurisdictions</u>	<u>Total Crime / incidences reported</u>	<u>Time period in Years</u>	<u>Crime / incidences per year</u>	<u>Comments</u>
Alameda County	22	4.25	5	22 Dispensary crimes from 2020-2024
Contra Costa Coun	n/a			Deputy District Attorney: Unable to search database without suspect name or victim name or police report number
Marin County	n/a			The County of Marin does not have commercial cannabis businesses in the Sheriff's jurisdiction. Please contact the police departments where such businesses are located.
San Francisco County (and City)	471	4.25	111	SFPD provided a list of incidences at Cannabis Dispensary address which total 471 incidences over 3.25 yrs.
San Mateo County	5	0.67	8	5 incidences reported at one Half Moon Bay dispensary over 8 months. San Mateo County Sheriff's Office: the vast majority of law enforcement records are exempt from release .
Santa Clara County	n/a			Office of the Sheriff, Santa Clara County : We do not have any commercial cannabis operations within our jurisdiction.
Solano County	112	4.25	26	Solano County response to the PRA were 2 detailed call reports for 2 cannabis dispensaries. One had 48 call and the other 64 calls over 3.25 year period.
Sonoma County	904	4.25	213	Sheriff office ran search's on Key words which came back with the following # of incidences from 2020-2024: Cannabis=63, Dispensaries=27, and Marijuana=814. Note the incident report had these keywords but that doesn't necessary mean it's the main reason
Napa County	n/a			No cannabis businesses in County, all are in the City of Napa city limits. " All cannabis dispensaries in the Napa County are located within the city limits of Napa."
Santa Rosa City	982	4.25	231	Provided excel file with 982 incidences over 4 years related to cannabis
Oakland City	n/a			Provided specific dispensary addresses. City indicated they will respond back in Oct 2024 timeframe 6 months out
Richmond City	328	4.25	77	Richmond provided criminal activity at 3 dispensary locations. In total 328 incidences were reported for the period 1/1/2020 to March 2024
Berkeley City	238	4.25	56	Berkeley provided criminal activity at 4 dispensary locations. In total 238 incidences were reported for the period 1/1/2020 to March 2024
Napa City	126	4.25	30	Provided PDF files for 7 sites that had 126 incidences, from 2Q20 to 2Q24. The files reference calls for service at those locations.
Total	3,188		756	

Total recap			
# of Jurisdictions tl	9		
Avg incidences per day			2.1
One incidence per XX hours			11.6

Sonoma County recap			
Sonoma County	904	4.25	213
Santa Rosa City	982	4.25	231
	1,886		444
Avg incidences per day			1.2
One incidence per XX hours			19.7

Attachment 2

Santa Rosa City Police Department- PRA Recap of Cannabis Related incidents From 2020 to 1Q2024 Locations with top number of incidents (dispensary locations in yellow)	
Sort by location:	
Location	Count of Event #
(blank)	428
UMMA SONOMA	27
SPARC	19
HERBL	17
SONOMA CHO DISPENSARY	12
HUMANITY WELLNESS	10
SRPD	9
MERCY WELLNESS	9
ALOHA AINA	8
SANTA ROSA HIGH SCHOOL	7
DOOBIE NIGHTS	7
ALTERNATIVES COLLECTIVE	6
CALIFORNIA CHAMPS	5
BELLEVUE RANCH PARK	5
PHENOTOPIA	5
GROW GENERATION	5
COMSTOCK MIDDLE SCHOOL	5
MCDONALDS	5
DURAMETRICS	4
SAFEWAY	4
SANTA ROSA PLAZA	4
TRIM DEPOT	4
PINER HIGH SCHOOL	4
SLATER MIDDLE	4
SANTA ROSA POLICE DEPT	4
OUTPOST DISPENSARY	4
DUTCH BROS	3
ELSIE ALLEN	3
DAN GOETZ WHOLESALE	3
WALGREENS	3
DUTTON PLAZA	3
KAISER	3
THE HOOK	3
HGN	3
CESAR CHAVEZ LANGUAGE ACADEMY	3

Attachment 3

Cannabis Homicides for Area's covered by Sonoma County Sheriff's office ***								
Included Project Homicide growth based on DEIR growth assumptions								
Totals Homicides per PRA's:				Potential increase in Homicides if murder rate follows the growth in Cannabis business				
SCSO, SPD, WPD	Total 2012 to June 2025	Percent of homicides caused by Cannabis		Current rate of homicides per year (13 year history)	Growth in Cannabis market per DEIR	Projected homicides per year based on DEIR growth	Projected # of years DEIR covers	Projected number of Homicides
ALL HOMICIDES	43							
MJ HOMICIDES	10	23%		0.77	1222%	9.40	20	188
DEIR projected growth of Commercial Cannabis								
	Total cannabis cultivation acres	Total Supply Chain sites	Net Projected Growth thru 2044					
Current size *	13.5	26						
2044 Projection**	208	235						
Percentage growth	1541%	904%	1222%					
* Acreage per 2024 Ag Commissioner Crop report. Supply chain per Section 2.2 Cannabis Overview, page 102								
** - (Section 2.6 Projected Future 2-25,page 125)								
*** - Unincorporated areas, Town of Windor, and City of Sonoma								
Backup:								
April 2018 PRA:								
SCSO, SPD, WPD	2012	2013	2014	2015	2016	2017	2018 TO DATE	TOTAL
ALL HOMICIDES	0	5	4	5	3	6	3	26
MJ HOMICIDES	0	3	0	0	3	2	2	10
MJ Home Invasions	0	6	3	5	2	2	4	22
June 2025 PRA:								
SCSO, SPD, WPD	2018	2019	2020	2021	2022	2023	2024	2025*
***Homicides	3	1	1	2	5	3	3	2
MJ related Homicides	2	0	0	0	0	0	0	0
April 2018 PRA included Home invasion data:								
The other part of the equation is the number of home invasion robberies where there was <u>not a homicide</u> , but Marijuana sales, production and/or theft of Marijuana money was the target.								

Attachment 4

Haleigh Frye

From: Hoff, David A@CHP <DAHoff@chp.ca.gov>
Sent: Tuesday, May 14, 2024 11:20 AM
To: Haleigh Frye; State.Clearinghouse@opr.ca.gov
Cc: Abrahams, Kristen@CHP
Subject: FW: Environmental Document Review – SCH # 2024040916 – Due to Lead Agency by 5/22/2024

EXTERNAL

Good morning,

While the impact of this project on the local traffic will likely be minimal, we have certainly seen an increase in violent crime in and around more rural cannabis operations. Violent crime would include armed robberies of the processing facilities which obviously puts public safety at risk as well as expends local law enforcement resources.

Thank You,
Dave

Dave Hoff, Captain

Commander
California Highway Patrol
Santa Rosa Area
6100 Labath Avenue
Rohnert Park, CA 94928
Office – (707) 806-5600
Cell – (707) 529-8086



From: CHP-EIR <EIR@chp.ca.gov>
Sent: Wednesday, May 8, 2024 4:39 PM
To: Ingels, Ross@CHP <Ringels@chp.ca.gov>; Hoff, David A@CHP <DAHoff@chp.ca.gov>
Cc: CHP-30AAdesk <30AAdesk@chp.ca.gov>; Abrahams, Kristen@CHP <Kristen.Abrahams@chp.ca.gov>
Subject: Environmental Document Review – SCH # 2024040916 – Due to Lead Agency by 5/22/2024

Good afternoon,

Special Projects Section (SPS) recently received the referenced Notice of Environmental Impact document from the State Clearinghouse (SCH) outlined in the following Web site:

[UPC19-0012 Bloomfiled Flowers LLC. \(ca.gov\)](https://www.ca.gov)