



SONOMA COUNTY FARM BUREAU

Affiliated with California Farm Bureau and American Farm Bureau Federation

December 5, 2025

E-MAIL

Chairperson Lynda Hopkins
Members of the Board of Supervisors
575 Administration Drive
Room 100A
Santa Rosa, CA 95403

Subject: Item 26. Comprehensive Cannabis Program Update and Final Environmental Impact Report, Permit Sonoma File No. ORD21-0004

Dear Chairperson Hopkins and Members of the Board:

We are writing to reiterate and emphasize our serious concern regarding the proposed Comprehensive Cannabis Program, particularly its approach to recognizing cannabis production as "controlled agriculture" and extending protections under the Right to Farm Ordinance and the Agricultural Element of the General Plan. We ask that you pull Item 26 from the Consent Calendar scheduled for December 9, 2025, to allow for further consideration and discussion.

We respect the hardworking growers who are seeking to make a living through cannabis production. We acknowledge that, botanically, cannabis production is a form of agriculture. However, the legal and regulatory reality is that cannabis is not federally recognized as a legal crop; it remains classified as a Schedule I controlled substance under federal law. This fact creates a complex issue for our county, one that we feel requires careful reconsideration.

The proposed designation of "controlled agriculture" has no clear definition within the state or county regulatory framework. This ambiguity brings controversy and discomfort among members of our county's agricultural community and beyond, who have duly expressed concern over this proposed ordinance. The concerns voiced by our neighbors and constituents regarding the proposed ordinance should not be taken lightly. There is a real sense of unease, and it is important that we listen to those voices as we work toward policies that best serve our entire community.

Significant emphasis on the importance of strengthening the Right to Farm Ordinance and expanding protections for existing agricultural production has been identified during and after our fight against Measure J and at every community outreach workshop hosted by Permit Sonoma in preparation for the General Plan update. As a result of these clear messages across Sonoma County, we urge you to reconsider the inclusion of cannabis in these core documents until it is fully legalized and redefined at the federal level. Protecting the long-term integrity of the Right to Farm Ordinance, a crucial tool for safeguarding our traditional farms from nuisance complaints, is paramount. Including a federally illicit substance under its protection undermines its legal standing and sets a precedent that could be detrimental to all of Sonoma County's producers. To

proceed with these inclusions risks diluting the integrity and efficacy of these policies, leaving them open to greater criticism and, ultimately, further controversy.

Moreover, the proposed ordinance lacks a clear framework for compliance and oversight upon adoption. Robust oversight mechanisms, enforcement protocols, and clear expectations for addressing issues like odor and security must be outlined and put in place before any final decision is made. Without a clear plan for monitoring and enforcement, the ordinance risks being ineffective and will likely exacerbate the concerns already raised by our community.

We urge you to reconsider the inclusion of cannabis in the Right to Farm Ordinance and the Agriculture Element of the General Plan. Adequate discussion and evaluation of these inclusions are needed and warrant proper vetting to recognize the damaging implications and unintended consequences.

We believe that protecting Sonoma County's agricultural heritage should be a priority, and that includes making sure we are creating policies that are clear, well-defined, and based on the current legal landscape. Once cannabis is federally legalized and the definition of controlled agriculture is clarified, we can revisit the issue with a more solid foundation for moving forward.

Thank you for your time and consideration of these important concerns.

Respectfully,

A handwritten signature in blue ink, appearing to read 'Pat Burns'.

Pat Burns
President

A handwritten signature in blue ink, appearing to read 'Dayna Ghirardelli'.

Dayna Ghirardelli
Executive Director