



11/13/2025

Members of the Board of Supervisors
County of Sonoma

E-Mail: bos@sonomacounty.gov

RE: Review of the Sonoma County Comprehensive Cannabis Program Update Final Environmental Impact Report

The Milo Baker Chapter (Sonoma County) of the California Native Plant Society is dedicated to protecting native plants and their habitats in Sonoma County. Plant communities provide key ecosystem services by maintaining water cycles, removing carbon dioxide from the atmosphere, and providing habitat for rare plant and animal species.

Below are our comments on the Sonoma County Comprehensive Cannabis Program Update Final Environmental Impact Report (FEIR). We have reviewed the comment letters on the FEIR and responses from Permit Sonoma, with particular attention paid to the responses to the comment letters from the California Department of Cannabis Control (CDCC), the California Food and Agriculture (CFA), the California Department of Fish and Wildlife (CDFW), and the Farm Bureau. Specifically, we agree with the CDFW letter from July 15, 2025, in which their review of the EIR identifies 12 Environmental Issues and provides 44 Recommendations to address the numerous and substantial environmental impacts associated with the DEIR. The letter is detailed and provides recommendations that would be easy to incorporate into the FEIR.

In general, we feel that none of the cannabis cultivation permits should be issued as a ministerial permit. All permits should be issued as a discretionary permit and reviewed under the California Environmental Quality Act (CEQA) under the purview of the various State environmental agencies. Details on this comment are as follows.

We do not agree with the FEIR that a crop swap (from traditional agriculture (e.g., vineyards, orchards, row crops) to cannabis cultivation) should fall under a ministerial permit, which involves little or no personal judgment, and is granted automatically if the project meets all objective, codified standards as they are written in the FEIR. The State agencies, identified

above, as well as professionals in various fields, have provided numerous comments to strengthen the parameters for review of cannabis cultivation. A discretionary permit is preferred over a ministerial permit by all of the licensing State agencies.

Table 3-2 identifies that lands in the LEA (Land Extensive Agriculture), LIA (Land Intensive Agriculture) DA (Diverse Agriculture), and RRD (Resources and Rural Development) zones require only a ministerial permit for such a conversion. As of 2024 Sonoma County Crop Reports, approximately 63,000 acres are planted into vineyards, 3,137 acres in apples, 1,694 acres in row crops and 23,608 acres are in forage (hay/haylage), over approximately 326,562 acres of designated agricultural lands. According to the FEIR, none of these acreages, if converted to cannabis, would require a review other than a ministerial permit. We do not agree with this requirement. Conversions in these zones should be discretionary and be under CEQA review. At the very least, the Program Update should appropriately evaluate and cover cultivation sites to adequately meet CEQA.

Although the extent of new cannabis cultivation under the proposed Cannabis Program Update, as identified on Draft EIR page 2-28, is anticipated to consist of 208 acres by 2044, this is an increase from the 13.46 acres of existing cannabis cultivation. This means that the remainder growth could likely be installed under a ministerial permit.

The Master Responses 3.2.4 (Crop Swap Approval) and 3.2.5 (Water Supply) of the FEIR do not address these concerns about the lack of CEQA review under the ministerial permit because the responses only apply to discretionary permits and not ministerial permits.

Similarly, the Revisions to Section 3.4 “Biological Resources” of the FEIR are addressing the mitigation measures required for discretionary permits. The Revisions to Section 3.4 do not address the concerns about ministerial projects, which could occur during the development of cannabis within the 326,562 acres. Without the discretionary permit, the detailed mitigation requirements in the Program Update are not applicable.

The CNPS Milo Baker Chapter urges the Board of Supervisors to direct staff to make revisions to the FEIR to include all cannabis permits as discretionary permits, which would be necessary to prevent, avoid and mitigate the negative environmental impacts to sensitive resources from the proposed program update.

Sincerely,



Trish Tatarian, Conservation Co-Chair

Milo Baker Chapter of the California Native Plant society