

Topics to highlight in public comment

Ongoing approval of permits

- The county should not continue to issue new permits before EIR is completed and suitable, sustainable locations are identified

Location of permitted grows

- Operations should not be near residences / unincorporated townships
- Operations should not be in RR and AR
- Indoor/greenhouse cultivation should not be allowed in RRD (where fire danger due to high electricity use)
- 24/7 activities should not be permitted next to residential enclaves
- Outdoor should only be allowed if meets appellation requirements- ie, no soil bags, no lights, no hoop houses
- Operations should not be on dead-end roads shared with residences
- Operations should not be in high and very high fire zones or remote locations that are challenging to access by police and fire
- Ordinance should have overall cap on total approved cultivation acreage consistent with EIR assumptions, cap can only be increased if impacts are re-assessed

Inadequate setbacks

- Indoor/ greenhouse operations should be required to have setbacks beyond baseline building code setbacks
- Setbacks should not be to a neighboring house but to a property line - impacts start at property line not at front door
- Minimum setbacks should be extended to 1000ft to property line to uphold health and safety clause
- Processing should have same setbacks as cultivation with no odor leaving premises

Odor / Visual / Wildlife / Security Impacts

- Odor should not be permitted to leave property line, both for indoor and outdoor grows
- Odor should not be permitted to taint neighboring crops or drift onto neighboring properties
- Hoop houses should not be permitted
- Ordinance must specifically disallow “crop protection” predator permits allowing poisoning, trapping, shooting or otherwise killing wildlife.
- Ordinance must specifically disallow fencing that disrupts movement of wildlife
- Ordinance should require a security plan that extends to nearby neighbors and should require consultation with said neighbors

Water Impacts

- Ordinance should ban all cultivation in water scarce areas (Water zones 3 and 4).

- The EIR must supply a detailed analysis of water availability in Zones 1 and 2, taking account the drought
- Ordinance should require frequent and diligent monitoring of groundwater, streams and riparian habitat to guard against degradation and pollution due pesticide, fertilizer and other chemical contaminants
- Ordinance should require sustainable Net Zero water use

Expedited permitting

- Ordinance should not allow for expedited (ministerial) permitting outside of dedicated inclusion zones
- Ordinance should fully ban multi-tenant ministerial permits, which circumvent CEQA
- Ordinance should forbid cultivation before permit approval (Penalty Relief Program allows operations to continue for years without compliance to laws)

Enforcement

- Non-routine inspections should not provide advance notice before inspection
- Enforcement of illegal water hauling must be taken seriously

Definitional Precision

- Ordinance should be prescriptive on how canopy is measured and should require annual verification
- Cannabis should remain classified as a product not a crop, as defined in Ballot Measure 64
- Ordinance must provide precise articulation of what is permitted at an outdoor grow... drying? aging? processing? trimming? packing? What is permitted at one of the nine allowed processing centers that isn't allowed on-site?
- Ordinance should define "local area"
- Ordinance should avoid obscure definitions open to staff interpretation