



Dry Creek Valley Association
PO Box 1221
Healdsburg, CA 95448
October 28, 2025

Sonoma County Board of Supervisors
575 Administration Drive 102A
Santa Rosa, CA 95403

**RE: Comprehensive Cannabis Program Update and Final Environmental
Impact Report, Permit Sonoma File No. ORD21-0004 2025-1117**

We, the Board of Directors of the Dry Creek Valley Association (DCVA), are writing to express our opposition to the Cannabis Ordinance as written and in opposition to certification of the Draft Environmental Impact Report. Our concerns fall into three broad categories:

1. Unclear future regulation of cannabis tasting events;
2. Possibility of a significant increase in the demand for scarce water;
3. Incompatibility of Cannabis cultivation with residential living within Dry Creek Valley.

Taking these in order, the ordinance creates the possibility for cannabis events and regularly scheduled cannabis tasting opportunities at places that grow cannabis. It has been suggested that these tasting opportunities will only happen after an additional permit is acquired (either a conditional use permit or a special events permit). But the conditions under which such additional permits will be issued are unclear

The Dry Creek Valley Citizens Advisory Council, an important part of the Sonoma County permitting process, has already addressed many aspects of the proposed ordinance in its document, "Guidelines for New Use Permits with Visitor Serving Agricultural Uses." Yet the DCVCAC and this part of the County process and agreed upon guidance is not included. This document addresses not only wineries, but any visitor serving facility on Ag land in the Dry Creek Valley.

The DCVA objects to this DEIR and ordinance and requires that the role of the DCVCAC, in permitting events and tastings, be specifically addressed in the ordinance.

The proposed conditions for a cannabis grow to qualify for a ministerial permit using a crop-swap are insufficient to protect scarce ground water resources. As written, qualification for a crop-swap, requires a showing that the water demand for the cannabis crop would be equal to the water demand for the replaced crop on average for the entire dry season. But the demand for water by cannabis is high for a relatively short growing season, so the peak monthly water usage for cannabis is likely to be significantly higher than the peak monthly water usage for the existing crop. Given the significant amount of time required for ground water aquifers to be replenished, this would result in periodic, significant depletion of existing ground water supplies. This is not a sustainable situation for other farmers and neighbors and should not be allowed.

Instead, the ordinance should require demonstration that no single month of water usage by the cannabis crop would exceed the corresponding monthly water usage for the replaced crop.

Finally, we are concerned generally with the compatibility of cannabis cultivation adjacent to the existing homes in Dry Creek Valley. The ordinance as proposed would require only a 100 foot setback of any licensed cannabis crop from the property line. A 100 foot setback is likely to have a significant negative impact on neighboring families. The odors associated with cannabis cultivation along with possible exposure to beta-myrcene would have unstudied, potentially unhealthful and unpleasant effects on neighbors. If the BOS is going to allow for cannabis cultivation in Dry Creek Valley, we request that the setback of any cannabis grow be kept at least 300 feet from homes, as is required under the current ordinance.

Yours truly

Dry Creek Valley Association Board