



DATE: October 21, 2021

RE: Sonoma County Board of Supervisors October 26, 2021 Hearing on Cannabis Moratorium

Corporate cannabis is gaming Sonoma County and violating state and local laws, while supervisors rig permitting to avoid protecting Sonoma County's environment.

Sonoma County has succeeded in rapidly accelerating cannabis permitting by issuing ministerial Zoning Permits (ZP), cannabis permits that violate Sonoma County's cannabis ordinance. Instead of benefiting "small family farmers," purportedly the group Sonoma County Supervisors want to encourage, the County's actions have in its place benefitted large cannabis operators such as CannaCraft and SPARC, as you will see in this memo with attachments.

These ministerial permits avoid consideration of the environmental impacts of the cannabis operations, including cumulative impacts, required by the California Environmental Quality Act (CEQA), and remove the public from the process entirely.

The Rules:

- To grow cannabis in Sonoma County, an operator must obtain both a state and a local license/permit.
- Sonoma County's 2018 Cannabis Ordinance established a ministerial path for outdoor cannabis cultivation of 10,000 square feet or less on parcels of 10 acres or larger, in LEA and DA zoned areas. All other cannabis operations (other than the very smallest – "cottage") require a Conditional Use Permit (CUP).
- The CUP process is expensive in time and money – takes approximately 2-3 years and \$30,000, but a ministerial process takes only approximately 3-4 months and costs less than \$5,000. The CUP process requires specific environmental review, is a public process, with public notification and hearings; the ministerial process has no project specific environmental review and is "over the counter" with no public notification or public process.
- Sonoma County regulations prohibit a cannabis operator from growing more than one acre total of cannabis within the County. (Sec. 26-88-254. -Cannabis cultivation—Commercial (e))
- Sonoma County regulations allow "multi-tenant" operations on a single parcel (10 acres or larger), as long as the aggregate cultivation area is no larger than is allowed by the ordinance. (Sec. 26-88-254. -Cannabis cultivation—Commercial (f)(2)) If multiple applicants apply for ministerial permits on a single parcel, Sonoma County's ordinance allows only a maximum outdoor cultivation area of 10,000 square feet for any single parcel.

The Problem:

Obviously, it is far cheaper and quicker to obtain a ministerial permit to grow cannabis outdoors than it is to enter the CUP process, which requires project specific environmental review and a full public process.

Starting in 2019, and accelerating in 2020 and 2021, cannabis operators figured out how they could game Sonoma County's cannabis permitting structure. Ministerial cannabis permits went from being a minority of cannabis applications to the vast majority in 2021 – 143 ministerial applications and only 3 CUP applications. See [Attachment A](#) for a graph comparing the number of ministerial applications to CUP application over years.

Even though County cannabis regulations limit outdoor cannabis cultivation with a ministerial permit to a maximum of 10,000 square feet on any single parcel, many of these applications were each for 10,000 square feet of cannabis cultivation on the exact same parcel. It strains credulity that the Sonoma County Department of Agriculture didn't "notice" this detail.

CannaCraft related businesses, in fact, submitted 17 applications, each for 10,000 square feet of cannabis cultivation, and the permits were issued in sequential order: APC21-0111 through APC21-0127. It's difficult to understand how the Sonoma County Department of Agriculture could have missed that these permit renewals would result in 5 parcels each having 40,000 square feet of cannabis cultivation, all controlled by one entity. And all issued in violation of the law.

These Sonoma County Department of Agriculture actions took place with at least the Board of Supervisors' tacit approval.

By this behavior, the County has evaded compliance with CEQA., as these piecemeal approvals clearly violate CEQA (among other CEQA violations). The County can't claim ignorance of how their actions violated state and local laws, as they have been notified of this problem for over a year by both concerned members of the public and their attorneys.

Although at least one Supervisor has suggested the County hire a "forensic accountant" to determine just how this happened, there's no need for that expenditure of money. Anyone with a little time, access to the internet and the County's data on cannabis permits applied for and issued can easily prove that the County has been issuing these large scale cultivation permits in violation of the law.

CannaCraft and SPARC, large corporate cannabis operators, are two examples of egregious violators of state and local laws. CannaCraft and SPARC have obtained multiple large scale permits under different LLCs and corporate names, which all are directly connected to their businesses. These issued permits violate both County regulations prohibiting more than one acre of cannabis cultivation per person¹, and

¹ Department of Cannabis Control Medicinal and Adult Use Commercial Cannabis Regulations Article 1. Division Definitions and General Requirements §15000. Definitions. "Person" includes any individual, firm, partnership, joint venture, association, corporation, limited liability company, estate, trust, business trust, receiver, syndicate, or any other group or combination acting as a unit, and the plural as well as the singular.

the prohibition against ministerial permits for more than 10,000 square feet of outdoor cultivation on any one parcel.

CannaCraft Violations:

Attachment B is a listing of 63 ministerial cannabis permits Sonoma County has issued in 2021 (through August 28, 2021). Of those permits, 28 have yellow highlighting indicating the cannabis permits pulled by CannaCraft related business entities.

Attachment C shows CannaCraft related businesses' permits under review, all on one parcel, which, if granted, would total 160,000 square feet of cannabis cultivation and 3.7 acres of total cultivation. Of that, 2.5 acres would be permits issued to CannaCraft related businesses in violation of law.

Attachment D is a partial listing of CannaCraft connected individuals and CannaCraft related LLCs and corporations.

SPARC Violations:

Attachment B is a listing of 63 ministerial cannabis permits Sonoma County has issued in 2021 (through August 28, 2021). Of those permits, 16 have green highlighting indicating the cannabis permits pulled by SPARC related business entities.

Attachment E shows four ministerial cannabis permits for 10,000 square feet each for the four WINGO RANCH LLCs (A, B, C, D) totaling 120,000 square feet of cannabis, all issued to businesses directly related to SPARC, in violation of the law.

Attachment F is a partial listing of SPARC connected individuals and SPARC related LLCs.

Additional Violations:

Attachment G show a number of other violations, including multiple parcels with ministerial permits resulting in more than 10,000 square feet of outdoor cannabis on a single parcel, including by general location.

The Solution:

All of the permits the Sonoma County Department of Agriculture or Permit Sonoma have issued that are in violation of Sonoma County's regulations should immediately be voided, and all pending applications that, if issued, would be in violation of Sonoma County's regulations should be terminated. When those applications, if issued, would not violate Sonoma County's prohibition of more than one acre of cannabis cultivation per person total in the County, or other Sonoma County or state regulations, the permit holders and applicants should be encouraged to reapply under the CUP process, as is required by law.

To do otherwise would be in violation of CEQA, state law, and Sonoma County's regulations.

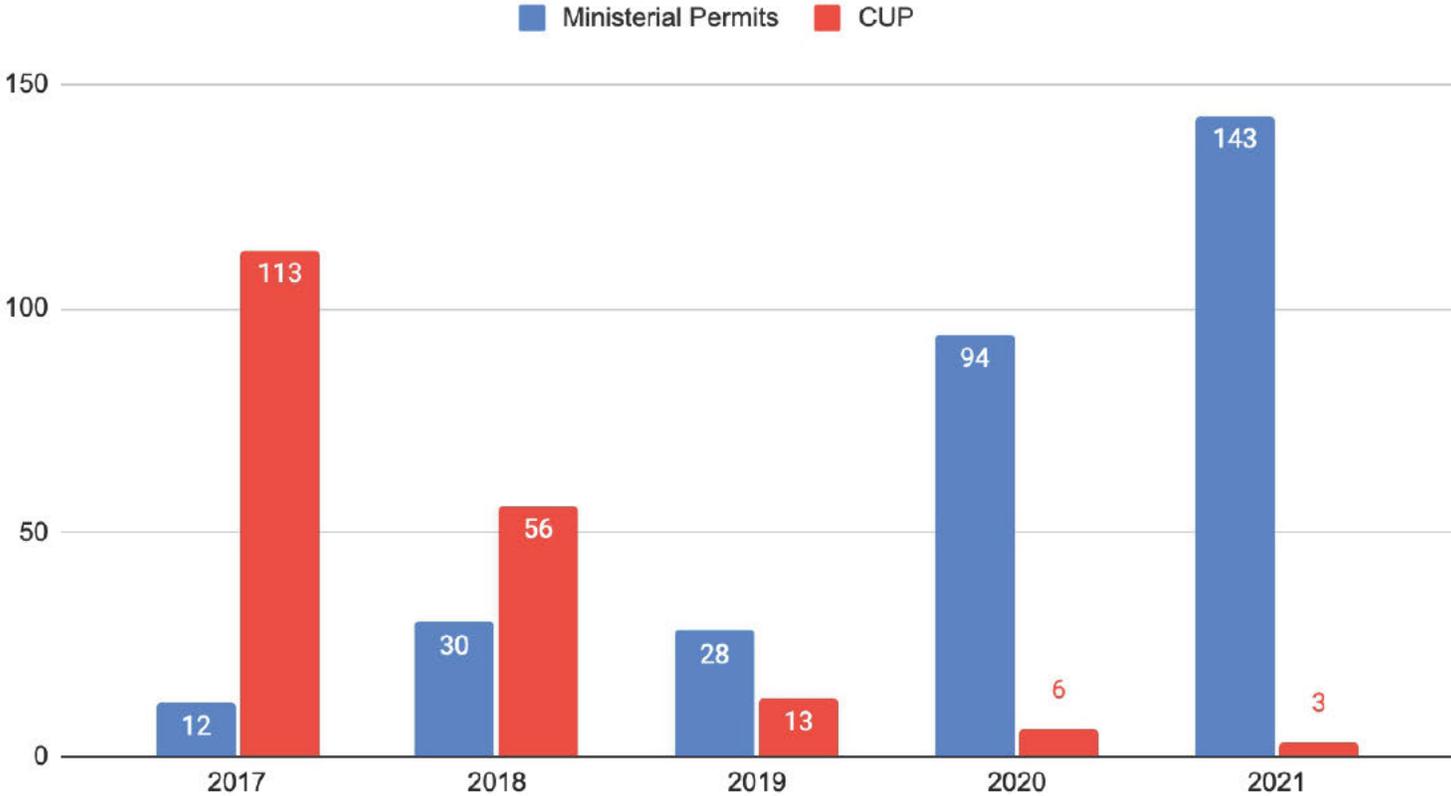
Instead, staff is recommending that the Board of Supervisors on October 26th extend all of the permits issued in violation of CEQA and Sonoma County's regulations for 5 years. That proposed 5 year

extension would itself be an additional violation of CEQA, as well as of both Sonoma County's regulations, and state law.

To be clear, there is no basis to extend these permits – issued in violation of multiple laws – for 5 years, or for any period. They must be voided immediately.

Attachment A

Percentage of Ministerial and Conditional Use Permits Issued by Year



Attachment B

Issued Permits

Ministerial Permits for the Year 2021

Cannabis outdoor cultivation (to-date: 8/28/2021)

Yellow Highlight = CannaCraft Related Permits/**Green Highlight** = SPARC Permits

APN	Parcel Size (Acres)	Land Use	Permit for Year 2021	Renewal Info	Parcel: total sf permitted	Parcel: qty of permits
022-100-036	24	LEA	APC21-0004	Renew APC19-0028	10,000	1
			APC21-0006	New permit	10,000	1
022-100-036 Total					20,000	2
022-240-007	138	LEA	APC21-0116	Renew APC20-0058	10,000	1
			APC21-0117	Renew APC20-0057	10,000	1
			APC21-0118	Renew APC20-0056	10,000	1
			APC21-0119	Renew APC20-0055	10,000	1
022-240-007 Total					40,000	4
022-240-008	135	LEA	APC21-0120	Renew APC20-0062	10,000	1
			APC21-0121	Renew APC20-0061	10,000	1
			APC21-0122	Renew APC20-0060	10,000	1
			APC21-0123	Renew APC20-0059	10,000	1
022-240-008 Total					40,000	4
022-240-009	40	LEA	APC21-0124	Renew APC20-0066	10,000	1
			APC21-0125	Renew APC20-0065	10,000	1
			APC21-0126	Renew APC20-0063	10,000	1
			APC21-0127	Renew APC20-0064	10,000	1
022-240-009 Total					40,000	4
022-260-003	165	LEA	APC21-0134	Renew APC20-0051	10,000	1
			APC21-0135	Renew APC20-0052	10,000	1
			APC21-0136	Renew APC20-0053	10,000	1
			APC21-0137	Renew APC20-0054	10,000	1
022-260-003 Total					40,000	4
025-080-024	32	LEA	APC21-0088	Renew APC20-0008	10,000	1
			APC21-0089	Renew APC20-0089	10,000	1
			APC21-0115	Renew APC20-0087	10,000	1
			APC21-0133	Renew APC20-0086	10,000	1
025-080-024 Total					40,000	4
026-080-008	12	LEA	APC21-0001	Renew APC19-0020	10,000	1
026-080-008 Total					10,000	1
027-170-016	96	LEA	APC21-0132	Renew APC20-0015	10,000	1
027-170-016 Total					10,000	1
028-060-044	21	DA	APC21-0002	New permit	10,000	1
028-060-044 Total					10,000	1
055-150-016	68	DA	APC21-0048	Renew APC20-0004	10,000	1
			APC21-0049	Renew APC20-0008	10,000	1
			APC21-0050	Renew APC20-0009	10,000	1
			APC21-0138	Renew APC20-0099	10,000	1
			APC21-0139	Renew APC20-0098	3,549	1
055-150-016 Total					43,549	5
062-010-023	106	DA	APC21-0090	Renew APC20-0094	10,000	1
			APC21-0091	Renew APC20-0096	10,000	1
			APC21-0092	Renew APC20-0095	10,000	1
			APC21-0093	Renew APC20-0097	10,000	1
062-010-023 Total					40,000	4
063-090-004	33	DA	APC21-0111	New permit	10,000	1
			APC21-0112	Renew APC20-0092	10,000	1
			APC21-0113	Renew APC20-0090	10,000	1

		APC21-0114	Renew APC20-0091	10,000	1
063-090-004 Total				40,000	4
063-150-024	16 DA	APC21-0033	Renew APC18-0045	10,000	1
		APC21-0035	Renew APC18-0034	10,000	1
		APC21-0036	Renew APC20-0007	10,000	1
		APC21-0045	New permit	10,000	1
063-150-024 Total				40,000	4
068-010-013	100 LEA	APC21-0070	Renew APC17-0019	10,000	1
068-010-013 Total				10,000	1
077-010-084	13 DA	APC21-0063	Renew APC20-0014	10,000	1
077-010-084 Total				10,000	1
077-110-070	11 DA	APC21-0032	Renew APC20-0001	10,000	1
077-110-070 Total				10,000	1
104-160-009	78 DA, LC	APC21-0007	New permit	10,000	1
		APC21-0008	New permit	10,000	1
104-160-009 Total				20,000	2
128-444-002	46 LEA	APC21-0013	New permit	10,000	1
		APC21-0014	New permit	10,000	1
		APC21-0015	New permit	10,000	1
		APC21-0017	New permit	10,000	1
128-444-002 Total				40,000	4
128-471-003	45 DA	APC21-0009	New permit	10,000	1
		APC21-0010	New permit	10,000	1
		APC21-0011	New permit	10,000	1
		APC21-0012	New permit	10,000	1
128-471-003 Total				40,000	4
128-471-004	85 LEA	APC21-0016	New permit	10,000	1
		APC21-0018	New permit	10,000	1
		APC21-0019	New permit	10,000	1
		APC21-0020	New permit	10,000	1
128-471-004 Total				40,000	4
128-471-006	321 LEA	APC21-0021	New permit	10,000	1
		APC21-0022	New permit	10,000	1
		APC21-0023	New permit	10,000	1
		APC21-0024	New permit	10,000	1
128-471-006 Total				40,000	4

Attachment C

One parcel with 16 total ministerial permit applications started for a total of 160,000 square feet of cannabis cultivation.

This parcel – 022 090 002 – is located at 5730 Bodega Avenue, Petaluma, CA 94952 and has 3.7 acres of permits in process.

Ministerial Permits for the Year 2021

Cannabis outdoor cultivation (to-date: 8/28/2021)

Yellow Highlight = CannaCraft Related Permits

Project Name	APN	Record Number	Status	Square Feet in the Permit	Acres
DYNAMIC DAVES LLC	022-090-002	APC21-0095	Started	10,000	0.2
		APC21-0096	Started	10,000	0.2
		APC21-0106	Started	10,000	0.2
		APC21-0107	Started	10,000	0.2
DYNAMIC DAVES LLC Total				40,000	0.9
GREEN DORADO LLC	022-090-002	APC21-0094	Started	10,000	0.2
		APC21-0105	Started	10,000	0.2
		APC21-0108	Started	10,000	0.2
GREEN DORADO LLC Total				30,000	0.7
MINH DINH	022-090-002	APC21-0097	Started	10,000	0.2
MINH DINH Total				10,000	0.2
SENNIN SOUL LLC	022-090-002	APC21-0103	Started	10,000	0.2
		APC21-0104	Started	10,000	0.2
		APC21-0110	Started	10,000	0.2
SENNIN SOUL LLC Total				30,000	0.7
SENNINSOUL.LLC@GMAIL.COM	022-090-002	APC21-0102	Started	10,000	0.2
SENNINSOUL.LLC@GMAIL.COM Total				10,000	0.2
WOO FARMS	022-090-002	APC21-0099	Started	10,000	0.2
WOO FARMS Total				10,000	0.2
WOO FARMS LLC	022-090-002	APC21-0098	Started	10,000	0.2
		APC21-0100	Started	10,000	0.2
		APC21-0109	Started	10,000	0.2
WOO FARMS LLC Total				30,000	0.7
Grand Total				160,000	3.7

APN	Project Name	Record Number	Status	Square Feet in the Permit	Acres
022-090-002	DYNAMIC DAVES LLC	APC21-0095	Started	10,000	0.2
		APC21-0096	Started	10,000	0.2
		APC21-0106	Started	10,000	0.2
		APC21-0107	Started	10,000	0.2
	GREEN DORADO LLC	APC21-0094	Started	10,000	0.2
		APC21-0105	Started	10,000	0.2
		APC21-0108	Started	10,000	0.2
	MINH DINH	APC21-0097	Started	10,000	0.2
	SENNIN SOUL LLC	APC21-0103	Started	10,000	0.2
		APC21-0104	Started	10,000	0.2
		APC21-0110	Started	10,000	0.2
	SENNINSOUL.LLC@GMAIL.COM	APC21-0102	Started	10,000	0.2
	WOO FARMS	APC21-0099	Started	10,000	0.2
	WOO FARMS LLC	APC21-0098	Started	10,000	0.2
		APC21-0100	Started	10,000	0.2
		APC21-0109	Started	10,000	0.2
022-090-002 Total				160,000	3.7

Attachment D

CannaCraft Connected Individuals and CannaCraft related LLCs and Corporations (partial list)

CannaCraft Connected Individuals:

Melissa Huynh = COO at Soma Rosa Farms, CannaCraft board member:

<https://www.linkedin.com/in/melissa-huynh-556613156/>

Deanna McKenzie = Executive Assistant at SomaRosa Farms (Ms. Huynh's employee):

<https://www.linkedin.com/in/deanna-mckenzie-2b74705/>

Edward Fussell (Ned) = Co-founder, Board Member, CannaCraft:

<https://www.cannacraft.com/employee/ned-fussell>

Christopher Potter = Director of Security, CannaCraft: <https://www.linkedin.com/in/chris-potter-817853149/>

Dallas Davis = Post Processing Supervisor/ Safety Officer at CannaCraft:

<https://www.linkedin.com/in/dallas-davis-6770921a6/>

Jonathan Lohne = Digital Media Producer at Cannacraft: <https://www.linkedin.com/in/jon-lohne-70428a1b/>

Paula Bruning = Executive Assistant to Co-Founder at CannaCraft: <https://www.linkedin.com/in/paula-bruning-0a06481a4/>

Sydney Harris = Employee Engagement Coordinator at CannaCraft;

<https://www.linkedin.com/in/sydney-harris-17a080180/>

Dustan Castro = Marketing Mgr Soma Rosa Farms

https://www.linkedin.com/search/results/all/?keywords=Dustan%20Castro&origin=GLOBAL_SEARCH_HEADER

CannaCraft Related Business Entities:

Sennin Soul LLC (Dallas Davis/Deanna McKenzie)

Green Dorado LLC (Melissa Huynh/Deanna McKenzie)

Fiasco Farms LLC (Melissa Huynh)

Over Thehump LLC (Jonathan Lohne/Melissa Huynh)

Leverage Farms LLC (Melissa Huynh)

Rain Gardens LLC (Melissa Huynh)

Digg It Gardens LLC (Paula Bruning/Melissa Huynh)

One Love Gardens LLC (Melissa Huynh)

Wild Heart Farms LLC (Melissa Huynh)

Big Swede LLC (Melissa Huynh)

Mosaic Ag LLC (Edward Fussell)

Flourish Farms LLC (Melissa Huynh/Deanna McKenzie)

Big Rig Farms LLC (Melissa Huynh)

Potter Family Farmz LLC (Christopher Potter/Deanna McKenzie)

All Not Good Inc. (Edward Fussell/Deanna McKenzie)

All Good Leasing Inc. (Edward Fussell/Barry Bricker)

Potter Family Farms LLC (Christopher Potter)

Mosaic Ag Inc. (Edward Fussell/Barry Bricker)

Victory Patch Brand Holdings LLC (Vanessa Calhoun/ Deanna McKenzie)

Nf Farm Labor Inc. (Edward Fussell/Deanna McKenzie)

Rocky Mountains Farms Inc. (Edward Fussell)

Tierra Tambor Inc. (Edward Fussell)

All Good Properties Inc. (Edward Fussell/Deanna McKenzie)

Kind Dog Inc. (Edward Fussell/Deanna McKenzie)

Clone Grown Inc. (Edward Fussell/Deanna McKenzie)

Kharisma LLC (Sydney Harris/Melissa Huynh/Deanna McKenzie)

Heavy Hitters Club LLC (Dustan Castro/ Deanna McKenzie)

Big Tuna LLC (Thomas Keefe/ Melissa Huynh/ Deanna McKenzie)

Dynamic Daves LLC (Melissa Huynh)

Attachment E

Sec. 26-88-254 (e) Multiple Permits

(e) **Multiple Permits.** Multiple cultivation permit applications will be processed concurrently. Multiple cultivation permits may be issued to a single person, **provided that the total combined cultivation area within the county does not exceed one (1) acre.** For the purposes of this provision, the entire cultivation area of a permit shall be attributed in full to each person who meets the definition of cannabis business owner of the permit holder.

one name having more than one acre of cannabis cultivation in the county

This is a sample from many instances that indicates a single person has created multiple "names" to circumvent the ordinance requirements an exceeded the limit of one acre of cannabis cultivation in Sonoma County -- to cultivate 3.7 acres

Green Highlight = SPARC Permits

Project Name	APN	Record Number	Status	Square Feet in the Permit	Acres
WINGO RANCH A LLC	128-444-002	APC21-0013	Issued	10,000	0.2
	128-471-003	APC21-0010	Issued	10,000	0.2
	128-471-004	APC21-0016	Issued	10,000	0.2
	128-471-006	APC21-0021	Issued	10,000	0.2
WINGO RANCH A LLC Total				40,000	0.9
WINGO RANCH B LLC	128-444-002	APC21-0014	Issued	10,000	0.2
	128-471-003	APC21-0011	Issued	10,000	0.2
	128-471-004	APC21-0018	Issued	10,000	0.2
	128-471-006	APC21-0022	Issued	10,000	0.2
WINGO RANCH B LLC Total				40,000	0.9
WINGO RANCH C LLC	128-444-002	APC21-0015	Issued	10,000	0.2
	128-471-003	APC21-0012	Issued	10,000	0.2
	128-471-004	APC21-0019	Issued	10,000	0.2
	128-471-006	APC21-0023	Issued	10,000	0.2
WINGO RANCH C LLC Total				40,000	0.9
WINGO RANCH D LLC	128-444-002	APC21-0017	Issued	10,000	0.2
	128-471-003	APC21-0009	Issued	10,000	0.2
	128-471-004	APC21-0020	Issued	10,000	0.2
	128-471-006	APC21-0024	Issued	10,000	0.2
WINGO RANCH D LLC Total				40,000	0.9
Grand Total				160,000	3.7

Sec. 26-88-254 (f) (2) Multi-Tenant Operations

(1) Minimum Lot Size. A minimum lot size of 10 acres is required for all commercial cannabis operations in the agricultural and resource zones (LIA, LEA, DA, RRD).

(2) Multi-Tenant Operations. Multiple permits may be issued for multi-tenant operations on a single parcel provided that the aggregate cultivation area does **not exceed the maximum area allowed for the cultivation type** and parcel size in compliance with Table 1A-D Allowed Cannabis Uses and Permit Requirements.

(3) Square Footage Limitations. The total combined square footage of the cultivation area shall not exceed the maximum size thresholds as defined in Table 1A-D Allowable Cannabis Uses and Permit Requirements which provides the maximum size per parcel.

Example of a one parcel exceeding the square footage allowed for zone permits

This is a sample from many instances revealing that Sonoma County is granting multi-tenant permits on a single parcel which in aggregate exceed the 10,000 square feet maximum area allowed for the cultivation type -- "Outdoor Small Cultivation".

Green Highlight = SPARC Permits

APN	Project Name	Record Number	Status	Square Feet in the Permit for the Parcel
128-444-002	WINGO RANCH A LLC	APC21-0013	Issued	10,000
	WINGO RANCH B LLC	APC21-0014	Issued	10,000
	WINGO RANCH C LLC	APC21-0015	Issued	10,000
	WINGO RANCH D LLC	APC21-0017	Issued	10,000
128-444-002 Total				40,000
128-471-003	WINGO RANCH A LLC	APC21-0010	Issued	10,000
	WINGO RANCH B LLC	APC21-0011	Issued	10,000
	WINGO RANCH C LLC	APC21-0012	Issued	10,000
	WINGO RANCH D LLC	APC21-0009	Issued	10,000
128-471-003 Total				40,000
128-471-004	WINGO RANCH A LLC	APC21-0016	Issued	10,000
	WINGO RANCH B LLC	APC21-0018	Issued	10,000
	WINGO RANCH C LLC	APC21-0019	Issued	10,000
	WINGO RANCH D LLC	APC21-0020	Issued	10,000
128-471-004 Total				40,000
128-471-006	WINGO RANCH A LLC	APC21-0021	Issued	10,000
	WINGO RANCH B LLC	APC21-0022	Issued	10,000
	WINGO RANCH C LLC	APC21-0023	Issued	10,000
	WINGO RANCH D LLC	APC21-0024	Issued	10,000
128-471-006 Total				40,000

Attachment F

SPARC Connected Individuals and SPARC related LLCs (partial list)

SPARC Connected Individuals:

Erich Pearson = CEO SPARC:

https://www.linkedin.com/search/results/all/?keywords=sparc&origin=RICH_QUERY_SUGGESTION&position=1&searchId=7ad4837b-a586-438e-ad7c-d771518e38e9

Christopher Hayes = cultivator for SPARC: <https://bohemian.com/chris-hayes-cultivator/>

Barry Wood = Matanzas Alliance dispensary investor:

<https://www.sonomanews.com/article/news/council-to-review-5-dispensary-finalists/>

SPARC Related Business Entities:

WINGO RANCH A LLC, (Christopher Hayes/Erich Pearson)

WINGO RANCH B LLC, (Jorge Ivan/ Erich Pearson)

WINGO RANCH C LLC, (Francisco Javier Castillo Mendoza/ Erich Pearson)

WINGO RANCH D LLC, (Barry Wood/ Erich Pearson)

Attachment G

In-process Permits

Status of Ministerial Permits for the Year 2021

Cannabis outdoor cultivation (to-date: 8/28/2021)

APN	Parcel Size (Acres)	Land Use	Permit for Year 2021	Permit Status with County	Renewal Info	Project Name	Parcel: total sf permitted	Parcel: qty of permits
022-090-002	395	LEA	APC21-0094	Started	Renew APC20-0032	GREEN DORADO LLC	10,000	1
			APC21-0095	Started	Renew APC20-0028	DYNAMIC DAVES LLC	10,000	1
			APC21-0096	Started	Renew APC20-0029	DYNAMIC DAVES LLC	10,000	1
			APC21-0097	Started	Renew APC20-0031	MINH DINH	10,000	1
			APC21-0098	Started	Renew APC20-0037	WOO FARMS LLC	10,000	1
			APC21-0099	Started	Renew APC20-0038	WOO FARMS	10,000	1
			APC21-0100	Started	New permit	WOO FARMS LLC	10,000	1
			APC21-0102	Started	Renew APC20-0035	SENNINSOUL.LLC@GMAIL.COM	10,000	1
			APC21-0103	Started	Renew APC20-0034	SENNIN SOUL LLC	10,000	1
			APC21-0104	Started	Renew APC20-0033	SENNIN SOUL LLC	10,000	1
			APC21-0105	Started	New permit	GREEN DORADO LLC	10,000	1
			APC21-0106	Started	Renew APC20-0084	DYNAMIC DAVES LLC	10,000	1
			APC21-0107	Started	Renew APC20-0027	DYNAMIC DAVES LLC	10,000	1
			APC21-0108	Started	Renew APC20-0085	GREEN DORADO LLC	10,000	1
			APC21-0109	Started	Renew APC20-0100	WOO FARMS LLC	10,000	1
			APC21-0110	Started	Renew APC20-0083	SENNIN SOUL LLC	10,000	1
022-090-002 Total							160,000	16
022-230-019	26	LEA	APC21-0062	Under Review	New permit	THE KATAHDIN BOUNDARY LLC	10,000	1
			APC21-0064	Under Review	New permit	THE KATAHDIN ASCENT LLC	10,000	1
			APC21-0065	Under Review	New permit	THE KATAHDIN CANOPY LLC	10,000	1
			APC21-0066	Under Review	New permit	THE KATAHDIN DESCENT LLC	10,000	1
022-230-019 Total							40,000	4
026-080-008	12	LEA	APC21-0101	Under Review	New permit	VALLEY FORD FARMS, INC.	10,000	1
026-080-008 Total							10,000	1
027-020-009	51	LEA	APC21-0058	Under Review	New permit	BLOOMFIELD CANNA LLC	10,000	1
			APC21-0059	Under Review	New permit	PETRICHOR SUNGROWN LLC	10,000	1
			APC21-0060	Under Review	New permit	BLOOMFIELD SUNGROWN LLC	10,000	1
			APC21-0061	Under Review	New permit	FLOWERS OF BLOOMFIELD LLC	10,000	1
027-020-009 Total							40,000	4
027-020-010	16	LEA	APC21-0056	Under Review	New permit	TRULOVE FARMS LLC	10,000	1
027-020-010 Total							10,000	1
027-100-025	2	RR	APC21-0054	Under Review	New permit	BLOOMFIELD CANNA FLOWERS LLC	10,000	1
			APC21-0055	Under Review	New permit	BLOOMFIELD SUNGROWN FLOWERS LLC	10,000	1
			APC21-0057	Under Review	New permit	BLOOMFIELD FLOWERS FARM LLC	10,000	1
027-100-025 Total							30,000	3
028-150-049	37	DA	APC21-0083	Under Review	New permit	AGRICOLA FLOWER & NURSERY	10,000	1
			APC21-0084	Under Review	New permit	BEQAA VALLEY FARMS	10,000	1
			APC21-0085	Under Review	New permit	DELICATE SAVVAGE LLC	10,000	1
			APC21-0086	Under Review	New permit	FINCA MONIMBO LLC	10,000	1
028-150-049 Total							40,000	4
047-132-015	10	DA	APC21-0087	Under Review	New permit	SO CO GROW LLC	10,000	1
047-132-015 Total							10,000	1

055-030-003	80 DA	APC21-0037	Paid	New permit	MBNCO INC	10,000	1
		APC21-0040	Under Review	New permit	MRFECO INC	10,000	1
		APC21-0041	Under Review	New permit	SIMPACO INC	10,000	1
		APC21-0043	Under Review	New permit	MCDCO INC	10,000	1
055-030-003 Total						40,000	4
055-040-034	20 DA	APC21-0038	Under Review	New permit	MBNCO INC	10,000	1
		APC21-0039	Under Review	New permit	MRFECO INC	10,000	1
		APC21-0042	Under Review	New permit	SIMPACO INC	10,000	1
		APC21-0044	Under Review	New permit	MCDCO INC	10,000	1
055-040-034 Total						40,000	4
055-040-090	16 DA	APC21-0144	Under Review	New permit	ROBIN WILSON HECKATHORN	10,000	1
055-040-090 Total						10,000	1
055-150-017	16 DA	APC21-0047	Under Review	New permit	SB BV FARMS LLC	10,000	1
		APC21-0051	Under Review	New permit	MC BV FARMS LLC	10,000	1
		APC21-0052	Under Review	New permit	MH BV FARMS LLC	10,000	1
		APC21-0053	Under Review	New permit	JA BV FARMS LLC	10,000	1
055-150-017 Total						40,000	4
060-080-012	11 DA	APC21-0030	Under Review	New permit	JOSEPH ULLMAN	10,000	1
		APC21-0031	Under Review	New permit	HANCOCK LUXURY PROVISIONS LLC	10,000	1
060-080-012 Total						20,000	2
063-260-001	18 DA	APC21-0026	Under Review	New permit	PATCHWORK FARMS	10,000	1
		APC21-0027	Under Review	New permit	ALMA GRANDE PROVISIONS	10,000	1
		APC21-0028	Under Review	New permit	FAMILY FLORALS	10,000	1
		APC21-0029	Under Review	New permit	HANCOCK LUXURY PROVISIONS LLC	10,000	1
063-260-001 Total						40,000	4
068-020-013	73 LEA	APC21-0067	Under Review	New permit	SIMPACO INC	10,000	1
		APC21-0068	Under Review	New permit	MCDCO INC.	10,000	1
		APC21-0069	Under Review	New permit	MBNCO INC.	10,000	1
		APC21-0071	Under Review	New permit	MRFECO INC	10,000	1
068-020-013 Total						40,000	4
073-061-018	10.9 DA	APC21-0128	Under Review	New permit	MOUNTAINSIDE FARMS LLC	10,000	1
		APC21-0129	Under Review	New permit	BOBCAT FARMS LLC	10,000	1
		APC21-0130	Started	New permit	BURNSIDE FARMS LLC	10,000	1
		APC21-0131	Under Review	New permit	WONDERFROST FARMS LLC	10,000	1
073-061-018 Total						40,000	4
076-110-028	14.5 DA	APC21-0034	Under Review	New permit	LISA LAI	10,000	1
076-110-028 Total						10,000	1
077-110-003	10.9 DA	APC21-0003	Paid	New permit	ZAID ZIADEH	10,000	1
		APC21-0046	Under Review	New permit	PACIFIC COAST FARMS INC	10,000	1
077-110-003 Total						20,000	2
077-110-070	11.2 DA	APC21-0025	Paid	New permit	SEA LION FARMS INC	10,000	1
077-110-070 Total						10,000	1
078-130-030	15.6 DA	APC21-0005	Under Review	New permit	MARCUCCI FARMS	10,000	1
078-130-030 Total						10,000	1
120-150-053	10.0 DA	APC21-0072	Under Review	New permit	AT FARMS LLC	10,000	1
		APC21-0073	Under Review	New permit	508 VINEYARDS, LLC	10,000	1
		APC21-0074	Under Review	New permit	PEW PEW FARMS, LLC	10,000	1

Table 5: List by parcel

Issued & In-process

Status of Ministerial Permits for the Year 2021

Cannabis outdoor cultivation (to-date: 8/28/2021)

APN	Parcel Size (Acres)	Land Use	Status_lumped	Parcel: total sf permitted	Parcel: qty of permits
022-090-002	395	LEA	Inprocess	160,000	16
022-100-036	24	LEA	Issued	20,000	2
022-230-019	26	LEA	Inprocess	40,000	4
022-240-007	138	LEA	Issued	40,000	4
022-240-008	135	LEA	Issued	40,000	4
022-240-009	40	LEA	Issued	40,000	4
022-260-003	165	LEA	Issued	40,000	4
025-080-024	32	LEA	Issued	40,000	4
026-080-008	12	LEA	Inprocess	10,000	1
			Issued	10,000	1
027-020-009	51	LEA	Inprocess	40,000	4
027-020-010	16	LEA	Inprocess	10,000	1
027-100-025	2	RR	Inprocess	30,000	3
027-170-016	96	LEA	Issued	10,000	1
028-060-044	21	DA	Issued	10,000	1
028-150-049	37	DA	Inprocess	40,000	4
047-132-015	10	DA	Inprocess	10,000	1
055-030-003	80	DA	Inprocess	40,000	4
055-040-034	20	DA	Inprocess	40,000	4
055-040-090	16	DA	Inprocess	10,000	1
055-150-016	68	DA	Issued	43,549	5
055-150-017	16	DA	Inprocess	40,000	4
060-080-012	11	DA	Inprocess	20,000	2
062-010-023	106	DA	Issued	40,000	4
063-090-004	33	DA	Issued	40,000	4
063-150-024	16	DA	Issued	40,000	4
063-260-001	18	DA	Inprocess	40,000	4
068-010-013	100	LEA	Issued	10,000	1
068-020-013	73	LEA	Inprocess	40,000	4
073-061-018	11	DA	Inprocess	40,000	4
076-110-028	14	DA	Inprocess	10,000	1
077-010-084	13	DA	Issued	10,000	1
077-110-003	11	DA	Inprocess	20,000	2
077-110-070	11	DA	Inprocess	10,000	1
			Issued	10,000	1
078-130-030	16	DA	Inprocess	10,000	1
104-160-009	78	DA, LC	Issued	20,000	2
120-150-053	10	DA	Inprocess	40,000	4
120-150-054	10	DA	Inprocess	30,000	3
120-150-055	12	DA	Inprocess	40,000	4
128-444-002	46	LEA	Issued	40,000	4
128-471-003	45	DA	Issued	40,000	4
128-471-004	85	LEA	Issued	40,000	4
128-471-006	321	LEA	Issued	40,000	4
142-051-005	24	LEA	Inprocess	40,000	4

Table 6: By Number of Permits per Parcel

Issued & In-process

Status of Ministerial Permits for the Year 2021

Cannabis outdoor cultivation (to-date: 8/28/2021)

<i>Parcel: qty of permits</i>	<i>APN</i>	<i>Parcel: total sf permitted</i>	<i>Parcel Report</i>
16	022-090-002	160,000	https://sonomacounty.ca.gov/templates_portal/ParcelDetail.aspx?APN=022-090-002
5	055-150-016	43,549	https://sonomacounty.ca.gov/templates_portal/ParcelDetail.aspx?APN=055-150-016
4	022-230-019	40,000	https://sonomacounty.ca.gov/templates_portal/ParcelDetail.aspx?APN=022-230-019
	022-240-007	40,000	https://sonomacounty.ca.gov/templates_portal/ParcelDetail.aspx?APN=022-240-007
	022-240-008	40,000	https://sonomacounty.ca.gov/templates_portal/ParcelDetail.aspx?APN=022-240-008
	022-240-009	40,000	https://sonomacounty.ca.gov/templates_portal/ParcelDetail.aspx?APN=022-240-009
	022-260-003	40,000	https://sonomacounty.ca.gov/templates_portal/ParcelDetail.aspx?APN=022-260-003
	027-020-009	40,000	https://sonomacounty.ca.gov/templates_portal/ParcelDetail.aspx?APN=027-020-009
	028-150-049	40,000	https://sonomacounty.ca.gov/templates_portal/ParcelDetail.aspx?APN=028-150-049
	055-030-003	40,000	https://sonomacounty.ca.gov/templates_portal/ParcelDetail.aspx?APN=055-030-003
	055-040-034	40,000	https://sonomacounty.ca.gov/templates_portal/ParcelDetail.aspx?APN=055-040-034
	055-150-017	40,000	https://sonomacounty.ca.gov/templates_portal/ParcelDetail.aspx?APN=055-150-017
	062-010-023	40,000	https://sonomacounty.ca.gov/templates_portal/ParcelDetail.aspx?APN=062-010-023
	063-090-004	40,000	https://sonomacounty.ca.gov/templates_portal/ParcelDetail.aspx?APN=063-090-004
	063-150-024	40,000	https://sonomacounty.ca.gov/templates_portal/ParcelDetail.aspx?APN=063-150-024
	063-260-001	40,000	https://sonomacounty.ca.gov/templates_portal/ParcelDetail.aspx?APN=063-260-001
	068-020-013	40,000	https://sonomacounty.ca.gov/templates_portal/ParcelDetail.aspx?APN=068-020-013
	073-061-018	40,000	https://sonomacounty.ca.gov/templates_portal/ParcelDetail.aspx?APN=073-061-018
	120-150-053	40,000	https://sonomacounty.ca.gov/templates_portal/ParcelDetail.aspx?APN=120-150-053
	120-150-055	40,000	https://sonomacounty.ca.gov/templates_portal/ParcelDetail.aspx?APN=120-150-055
	128-444-002	40,000	https://sonomacounty.ca.gov/templates_portal/ParcelDetail.aspx?APN=128-444-002
	128-471-003	40,000	https://sonomacounty.ca.gov/templates_portal/ParcelDetail.aspx?APN=128-471-003
	128-471-004	40,000	https://sonomacounty.ca.gov/templates_portal/ParcelDetail.aspx?APN=128-471-004
	128-471-006	40,000	https://sonomacounty.ca.gov/templates_portal/ParcelDetail.aspx?APN=128-471-006
	142-051-005	40,000	https://sonomacounty.ca.gov/templates_portal/ParcelDetail.aspx?APN=142-051-005
3	027-100-025	30,000	https://sonomacounty.ca.gov/templates_portal/ParcelDetail.aspx?APN=027-100-025
	120-150-054	30,000	https://sonomacounty.ca.gov/templates_portal/ParcelDetail.aspx?APN=120-150-054
2	022-100-036	20,000	https://sonomacounty.ca.gov/templates_portal/ParcelDetail.aspx?APN=022-100-036
	060-080-012	20,000	https://sonomacounty.ca.gov/templates_portal/ParcelDetail.aspx?APN=060-080-012
	077-110-003	20,000	https://sonomacounty.ca.gov/templates_portal/ParcelDetail.aspx?APN=077-110-003
	104-160-009	20,000	https://sonomacounty.ca.gov/templates_portal/ParcelDetail.aspx?APN=104-160-009

Table 7: Year Comparison -- 2020 and 2021

Issued & In-process

Status of Ministerial Permits for the Year 2021

Cannabis outdoor cultivation (to-date: 8/28/2021)

<i>Parcel: qty of permits</i>		<i>Year Issued or Started</i>	
<i>Area</i>	<i>APN</i>	2020	2021
Bennett Valley [BEN]	055-030-003		4
	055-150-016	5	5
	055-150-017		4
Bloomfield [BLO]	027-020-009		4
	027-020-010		1
	027-100-025		3
	027-170-016	1	1
Bodega Bay [BBY]	073-150-003	2	
Glen Ellen [GLE]	055-040-034		4
	055-040-090		1
Graton [GRA]	061-030-015	1	
	078-130-030		1
	104-160-009		2
Lakeville [LAK]	068-020-013		4
	068-050-008	4	
Mark West Springs [MWS]	028-060-044		1
	120-150-053		4
	120-150-054		3
	120-150-055		4
Penngrove [PEN]	047-101-019	4	
	047-132-015		1
Petaluma [PET]	017-120-011	4	
	068-010-013	1	1
Rincon Valley [RIN]	028-150-049		4
Sebastopol [SEB]	060-080-012		2
	063-150-010	4	
	063-150-024	4	4
	063-260-001		4
Sonoma [SON]	128-444-002		4
	128-471-003		4
	128-471-004		4
	128-471-006		4
	142-051-005	4	4
Twin Hills [TWI]	025-080-024	4	4
	026-080-008	3	2
	061-040-073	2	
	062-010-023	4	4
	063-090-004	4	4
	073-061-018		4
	076-110-028		1
	077-010-084	1	1
	077-110-003		2
077-110-070	1	2	
Two Rock [TWO]	022-090-002	16	16
	022-100-036	3	2
	022-230-019		4
	022-240-007	4	4

	022-240-008	4	4
	022-240-009	4	4
	022-260-003	4	4
	022-290-005	4	
Windsor [WIN]	163-180-012	2	
Grand Total		94	144