

Proposition 64 Cohort 3 Grant Program

Local Evaluation Plan

Title of Project:

Sonoma Together

Submitted by:

County of Sonoma

Prepared by:

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Date:

September 1, 2023

Project Period:

May 1, 2023 – April 30, 2028

Project Background

PPA 3: Public Safety

PRMD estimates that there are approximately 1,000 non-regulated commercial cannabis cultivation and production sites within its borders. These sites are often located in isolated rural areas behind a series of locked gates. They are also often protected by surveillance systems, guard dogs, and sometimes armed security personnel. Further, PRMD lacks the appropriate vehicles and other resources needed to safely navigate the terrain and makeshift roadways to reach some of these remote locations. These issues clearly present risks to staff safety when attempting to inspect cannabis sites. Beyond the threat to staff safety, unpermitted cannabis sites present a serious concern for public safety. It is well-established that the non-regulated cannabis production sites have long been associated with criminal activity.

Of the estimated hundreds of illegal commercial cannabis cultivation and production sites within the County, less than 200 applications have been received by PRMD to become legally approved cannabis cultivation and/or production businesses. Out of the 200 applications received, just 40 have been approved to date. While some applications are pending, others have been denied or were withdrawn. The balance of cultivation and/or production sites are unable to apply or are uninterested in the process to gain legitimate standing within the County. These illegal operations need to be closed or brought under compliance to protect public safety.

Public safety issues around unregulated cannabis sites include improper use of fertilizers and pesticides, illegal water diversion, extensive trash, human and non-biodegradable waste, and unregulated, poorly graded illegal roadways all have serious impacts to the safety of waterways and soil health and stability. The threat of fires is also exacerbated as unregulated cannabis sites may have large generators and electrical services that are improperly installed and used, all without the benefit of permitting and inspection to ensure safety. Fires around such sites are an eventuality that would likely impact others throughout the County.

With this grant, the County of Sonoma will improve its enforcement capability and capacity to address the threats to safety and environmental degradation created by the passage of Proposition 64. The ability to improve visual access to cannabis cultivation will be improved through the purchase of periodic aerial imagery over unincorporated areas of the county, and through the purchase of new Unmanned Aerial Vehicles (UAVs) as well as repairs and updates to existing UAVs. Agency capacity will be enhanced by hiring one term-limited, CES Code Enforcement Inspector, for the five-year grant funding duration, and hiring one full-time term-limited Code Enforcement Senior Office Assistant for the five-year grant funding period.

In addition, CES will enhance inspector safety through the purchase of two-way radios to maintain communications between field staff and other agencies while inspecting both permitted and unpermitted cannabis cultivation sites. Normal field communication methods like cellular phones

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are unreliable in remote areas where many cultivation sites are located. In Sonoma County, these "dead zones" include vast areas along the coast and other remote inland areas. In an emergency, the use of radios with emergency responder communication systems built in will provide efficient, reliable, and potentially life-saving communications between inspection staff and emergency responders. A 4-wheel drive truck will further inspector safety by providing a vehicle suitable for travelling to very remote and difficult to access cultivation sites.

PPA 4: Environmental Impacts

As environmental impacts from unregulated cannabis sites are inextricably linked to public safety, the need to address environmental impact mirrors the need described within PPA 3 above. To recap, environmental impacts from unregulated cannabis sites include the safety of waterways and soil health and stability. The threat of fires, from unpermitted, improperly installed or used electrical services and large generators, adds another source of pollution of air, water, and soil which has already been adversely affected by recent wildfires in Sonoma County. Beyond the obvious environmental impacts, the costs associated with mitigating damage from this potential source of fire, are too high to allow these unpermitted cannabis sites to operate without proper attention to environmental concerns.

Additional grant activities will ameliorate environmental impacts from cannabis cultivation. Specifically, proactive educational support to cannabis cultivators will be provided by the creation and distribution of educational materials to both permitted and unpermitted cannabis cultivation sites. These will address Best Management Practices (BMPs) to mitigate potential environmental hazards, such as erosion control, site maintenance of crop areas, and proper chemical storage.

As public safety and environmental impact are intertwined, there is overlap between some grant activities described within PPA 3 which also address environmental impacts from unpermitted commercial cannabis sites. The use of aerial imagery to identify unpermitted commercial cannabis sites is an efficient use of human and environmental resources. By reducing the number of in-person site inspections needed to verify the existence of unpermitted sites, staff save time in the field navigating remote terrain to follow up on a tip or complaint received without specific knowledge of the exact location or conditions they will find once on-site. Besides staff time saved by limiting site inspections, natural resources are conserved as well (e.g., miles travelled, fuel consumed). Once identified, unpermitted commercial cannabis sites need information about environmental ordinances and the permitting process. Providing this information during initial site inspections is an important step in regulating this industry in Sonoma County.

Additional work improving communication and coordination between CES and other environmental agencies with which the Section engages to address environmental ordinances. The County's Environmental Health Division, the District Attorney's Environmental Unit, and the Department of Fish and Wildlife all interact with CES to regulate commercial cannabis. These agencies have

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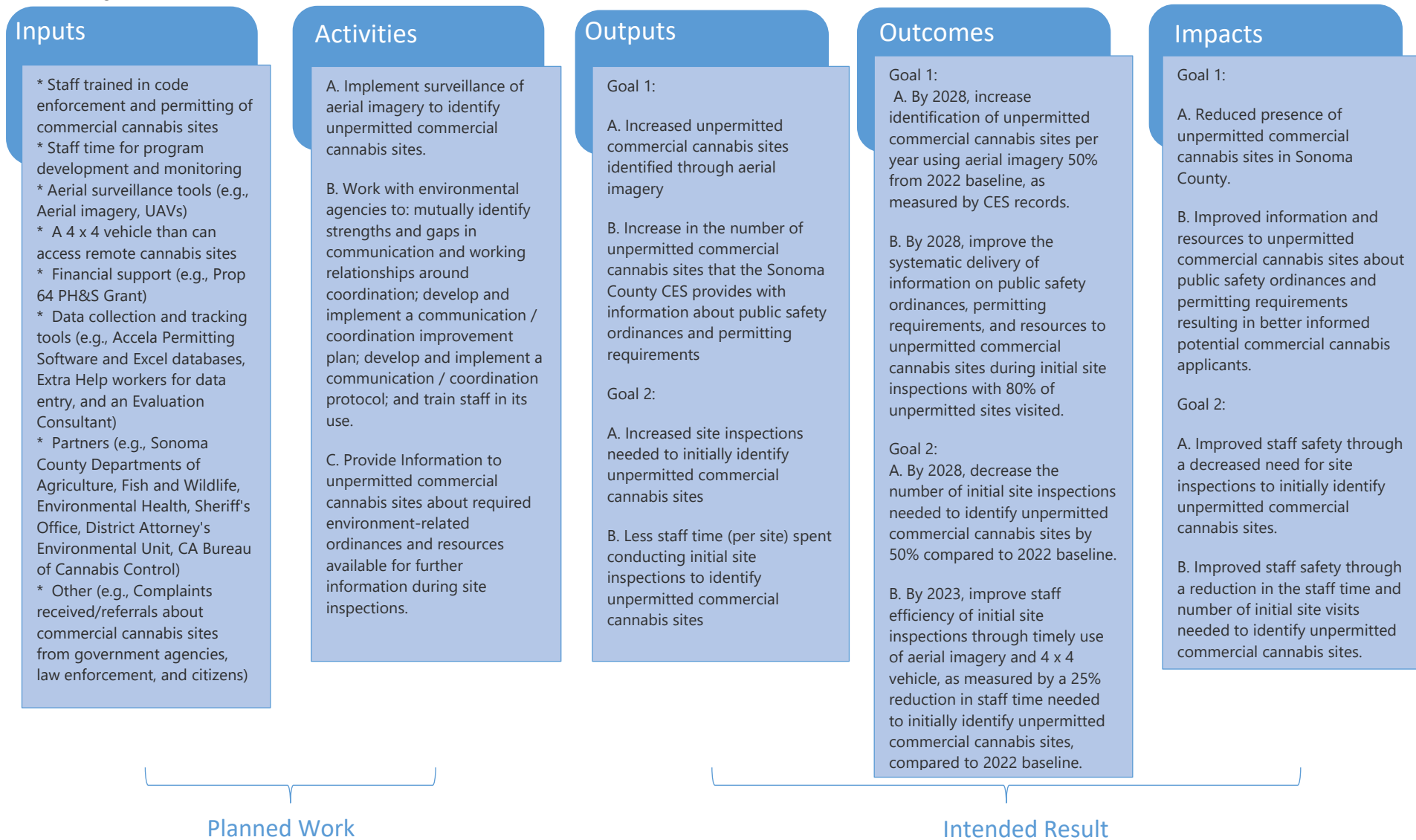
different but related goals and must work together to fully address environmental issues from cannabis cultivation. Though communication and coordination are adequate, they could be improved to produce a more streamlined integrated approach to the work.

Project Logic Model

PPA 3 – Public Safety

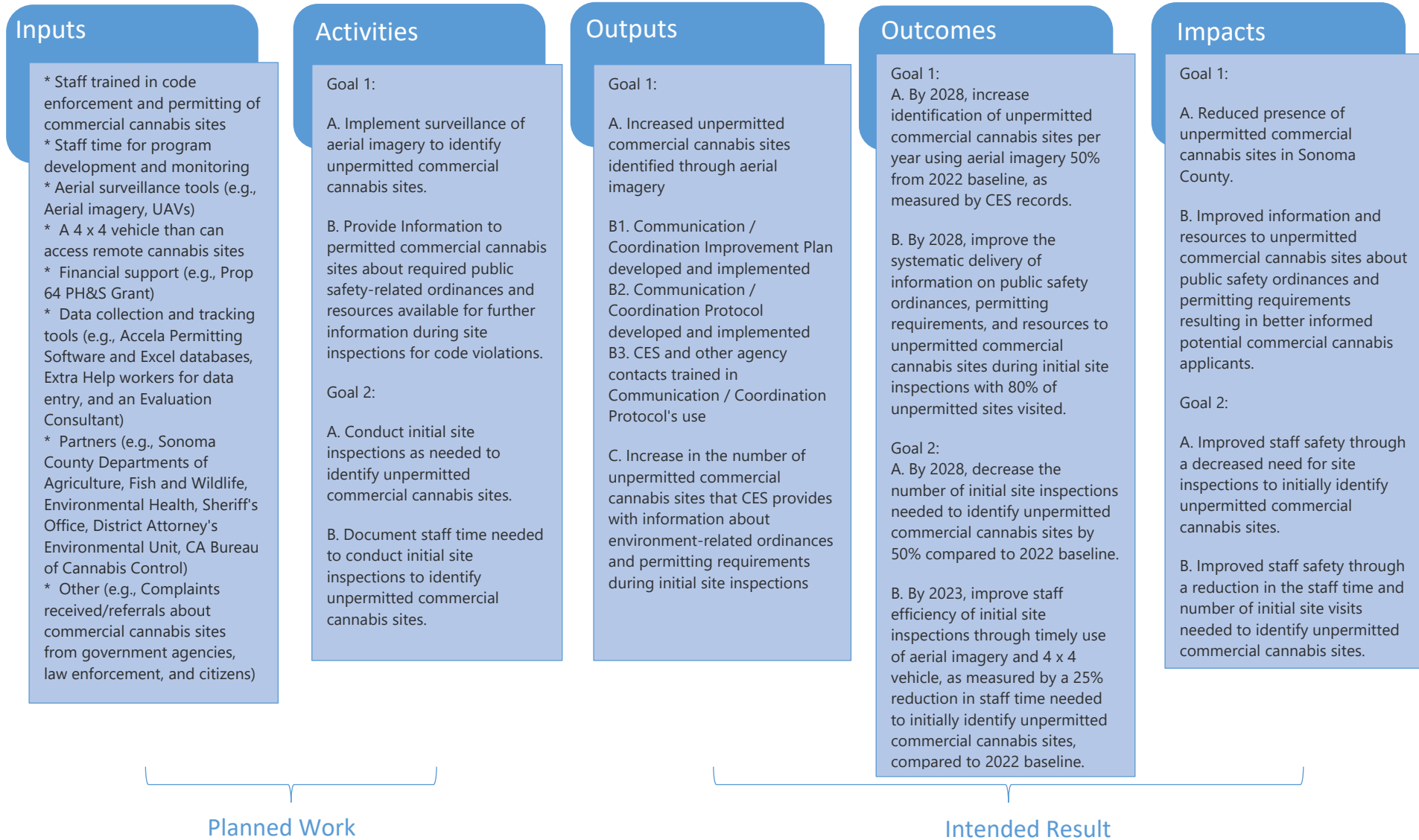
Goal 1: Reduce impacts of unpermitted commercial cannabis cultivation/production sites on the public safety of Sonoma County residents.

Goal 2: Improve safety of staff conducting site inspections to unpermitted commercial cannabis sites using aerial imagery, UAVs, 4 x 4 vehicle, and upgraded communications (radios / antennas).



PPA 4- Environmental impacts

Goal 1: Reduce environmental impacts of unpermitted commercial cannabis cultivation/production site on Sonoma County.



Process Evaluation Method and Design

Input/Resource/Activity/Output	Data Element(s)	Data Source(s)	Frequency of Data Collection
Inspect 80% of all licensed cannabis cultivators per year	# of code enforcement inspections completed of licensed sites	Code Enforcement tracking system, code enforcement inspection logs	Each time an inspection occurs throughout duration of grant
Initially identify 50 unlicensed/illegal cultivation sites per year using aerial imagery	# of parcels reviewed via aerial/UAV imagery; # of sites confirmed with unpermitted cannabis plants	Code Enforcement tracking system	Each time a surveillance event occurs and each time a site is identified throughout duration of grant
Eradicate 10,000 illicit cannabis plants per year	# of illicit cannabis plants identified and eradicated	Code Enforcement tracking system, Code Enforcement inspection logs	Each time illicit cannabis plants are identified and eradicated
Initially identify 50 unpermitted structures on permitted and unpermitted cultivation sites per year	# of structures issued a Notice & Order	Code Enforcement tracking system	Each time an unpermitted structure is identified.
Maintain enforcement database for violation noticing and other enforcement actions	# of violations related to cannabis cultivation	Permit database	Annually throughout duration of grant
Purchase 4x4 truck	# of trucks purchased	Purchasing records	Annually throughout duration of grant
Purchase radios/communication devices	# of radios and other communication equipment	Purchasing records	Annually throughout duration of grant

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Purchase/maintain UAVs, UAV pilot training	# of UAVs purchased, # of inspection staff trained as UAV pilots	Purchasing records, Staff time tracking	Inspected and/or replaced as needed annually throughout duration of grant
Educate cultivators on proper chemical storage and BMPs.	Production/purchase/distribution of informational pamphlets. Verbal instructions	Purchasing records / Inspector notes in permit tracking system	During each site inspection
Extent to which project was successfully implemented	Facilitators to implementation Barriers to implementation	Discussions with staff during staff meetings. Discussions with partners.	Biannually throughout duration of grant

Outcome Evaluation Method and Design

Process Evaluation

The process evaluation focuses on the extent of implementation and completion of grant activities. The evaluation will triangulate both quantitative and qualitative data as needed to document implementation and provide various perspectives on the quality of implementation, barriers, and facilitators encountered to inform program improvement efforts. The objectives across all PPAs involve both process and outcome evaluation.

PPA 3 and 4 include a combination of process and outcome-related objectives. One process-related objective appears in both PPA 3 and PPA 4, and that is documenting the delivery of information about County ordinances related to safety and environmental impacts and the extent it is delivered in a systematic way to unpermitted commercial cannabis sites during initial site inspections along with information on permitting requirements should sites decide to apply for needed permits to legalize their operations. The final process-related objective relates to PPA 3 – improved efficiency of initial site inspections as documented by a decreased amount of staff time needed to conduct initial site inspections to unpermitted commercial cannabis sites.

Outcome Evaluation

The outcome evaluation assesses the change in conditions for intended populations addressed within the objectives being measured. PPA 3 and PPA 4 share one similar outcome-based objective; to increase the percentage of unpermitted commercial cannabis sites identified using aerial imagery. PPA 3 also applies another outcome-related objective which is to decrease the number of site inspections needed to identify unpermitted commercial cannabis sites. Finally, PPA 4 has an additional outcome-related objective, which is to improve communication and coordination with outside environmental agencies with which CES works, as measured by quality of interagency contacts and key informant interviews. Quality of contacts will be determined through the development of a data collection tool based on the communication and coordination protocol that will be developed for this objective. The efforts to assess this working relationship, develop and implement an improvement plan, and evaluate its effectiveness, are activities that will be facilitated by the evaluator through the identification and/or development of assessment tools, implementation of the tools, support in locating examples of improvement plans and communication/coordination protocols, and helping to develop the plan and protocol, as well as training staff in its use, are all activities within the scope of service for the evaluator.