

Johanna DeLong

From: Marlo Friend <marlofriend09@gmail.com>
Sent: Monday, July 20, 2026 12:23 AM
To: Helen Owen; Bruno Sabatier; Eddie Crandell; Brad Rasmussen; Jessica Pyska; Lake County Clerk of the Board
Subject: [EXTERNAL] Request to Pull Item 5.10 – July 21, 2026 and written public comment

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Board of Supervisors and Clerk of the Board,

Because the eComment system is unavailable and triggered a security warning when I tried to use it, I am submitting this written public comment by email instead. I apologize that this comment is quite long, but every point feels critical regarding the serious issues raised by the two revocation cases and the proposed changes to Article 27. I really hope you will take the time to read it in full. Please distribute this comment to all five supervisors, include it in the official public record for Item 5.10, and confirm that it was received before the meeting.

I respectfully ask a Board member to pull Item 5.10 from the consent agenda for separate discussion. I also ask that it be heard after the two cannabis permit revocation hearings under Items 6.5 and 6.6 or continued to a later meeting.

Item 5.10 contains significant changes to cannabis permitting, inspections, enforcement, and permit duration. These changes should not be approved as part of the consent agenda before the Board hears the evidence involving the two major cannabis permit revocations appearing later on the same agenda and public comment.

The proposed Article 27 amendments would allow cannabis compliance monitoring visits to be reduced to once every two years after five years without documented violations. The amendments would also remove the existing 10 year permit expiration and renewal requirements by replacing that section with the word "Reserved." Removing the 10 year expiration and renewal requirement could allow cannabis use permits to continue indefinitely without a formal renewal review. The existing 10 year requirement should be retained so every cannabis use permit must undergo a full compliance and public review before being allowed to continue beyond ten years.

Annual performance reports and public access to inspection reports are positive changes. However, paperwork does not replace an actual site inspection, regular verification of state licensing, or a meaningful permit renewal process.

The information referenced below regarding items 6.5 and 6.6 comes directly from the county's own inspection reports, memoranda, revocation materials, and agenda documents.

Item 6.5 Blue Oak Farms presents a troubling pattern. Although the County inspected the property in July 2025 and identified missing zoning clearances, permit issues, unavailable security cameras, background check concerns, grading and ADA deficiencies, the operation was allowed to continue.

After the California Department of Fish and Wildlife executed a search warrant in April 2026, authorities eradicated 6,384 cannabis plants, and the County documented cultivation without a valid state license, unpermitted structures and water tanks, hazardous electrical and generator installations, residential occupancy of a shipping container, rubbish and outdoor storage, a site that did not match the approved plans, and the burning of prohibited materials.

Item 6.6 Canvas Farms, Community Development is recommending revocation of the Canvas Farms permit, UP 18-38. The permit holder is identified as John Brosnan, while Jennifer Smith is identified as the lessee and operator. County staff states that Jennifer Smith engaged in commercial cannabis cultivation without a valid state license. On September 4, 2025, Community Development was notified of an imminent search warrant involving the Lake County Sheriff's Office, the California Department of Cannabis Control, and the California Department of Fish and Wildlife. Approximately 4,785 plants were destroyed, and 234 pounds of processed cannabis were seized. County staff conducted its annual inspection after the outside agencies had completed the search warrant investigation and related abatement activities.

Canvas Farms violations went far beyond cultivating without a valid state license. After the law enforcement raid, the County documented unpermitted structures, hazardous electrical work, unpermitted plumbing and mechanical installations, wastewater from showers and a washing machine being discharged directly onto the ground, improper cannabis waste handling, documented pesticide violations, outdoor rubbish, unapproved water tanks and structures, and failure to install the required fire suppression tank. Inspectors also discovered a large quantity of unlicensed cannabis stored and being processed in an unapproved room, which the County ordered destroyed. These are serious health, safety, fire, environmental and permit compliance violations.

In both cases the full scope of the serious violations only became apparent after action by outside agencies. This raises a fundamental question. If the outside agencies had not investigated these operations, would the County have even discovered that two County permitted cannabis projects were allegedly cultivating without valid state licenses?

These cases demonstrate why state license verification, and County inspections should be strengthened, not reduced. They also raise serious concerns about whether the County's cannabis program is consistent with state law requirements for robust local oversight and enforcement. If CDD cannot regularly verify state licenses, conduct annual inspections, follow up on changes in operators, and identify unlawful cultivation at existing permitted sites, the Board should examine whether the department has the

capacity to properly enforce Article 27. The current process creates the appearance that important information is being kept within CDD and is not reaching the Planning Commission, Board, or the public in a timely and complete way.

The purpose of cannabis oversight should be to protect the health, safety and welfare of the public, surrounding communities, workers, water resources, wildlife, and the environment. Neighboring residents can be impacted by cumulative effects such as odor, traffic, water use, and fire risk. Unpermitted electrical work, improper pesticide use, unlawful cultivation, waste, grading, water use, and other permit violations can create risks that extend far beyond the boundaries of an individual property.

This is not necessarily a criticism of individual employees. It is a serious question about the management and effectiveness of the overall cannabis program. The fact that outside agencies, not the County's routine monitoring process, apparently uncovered both operations raises legitimate concerns about whether CDD's current oversight system is adequately protecting the public and the environment.

The County should conduct a comprehensive review of all active cannabis permits, verify every state license and background check, and report the results publicly before inspections are reduced or additional safeguards are removed. The Board should also impose a pause on approval of any new cannabis permits until this review is complete.

Background checks are required for cannabis owners, operators and employees to lawfully operate under Article 27. Canvas Farms' records do not identify who was cleared, while Blue Oak Farms inspection specifically showed that employee background checks had not been verified. The Board should ask why Blue Oak Farms was allowed to continue operating without proof that this requirement had been met and whether all owners, operators and employees of both farms were properly cleared.

There is also a legitimate public confidence concern regarding the Article 27 recommendations. In March 2021, the Board approved a review committee (Cannabis task force) that specifically included Jennifer Smith as the Lake County Cannabis Alliance representative. Task force minutes show that one of her actions on the committee was seconding a motion to reduce annual inspections to every other year. Now the Board is being asked to adopt reduced inspection frequency on the same agenda where it is considering revocation of the permit for the operation she ran as lessee and operator.

The County's OpenGov portal also currently shows Preliminary Application PL-26-381, submitted on June 25, 2026, under Jennifer Smith and Canvas Farms and referencing the same UP 18-38 project while the existing permit is facing revocation. The County should publicly explain how this new application will be handled and whether a new application, lease, operator, ownership arrangement, or transfer may proceed while violations, remediation requirements, or revocation proceedings involving the same operation remain unresolved. Article 27 should expressly prevent a new application,

replacement operator, lease, transfer, ownership change, or change in controlling interest from being used to avoid an unresolved enforcement or revocation matter.

Before adopting the proposed amendments, I respectfully ask the Board to retain annual on site compliance inspections and the existing 10 year permit expiration and renewal requirement. I also ask the Board to require regular electronic verification of all required state licenses throughout the cultivation season, immediate notification and enforcement when a state license expires or is revoked, full disclosure and county approval of all parties with control over the operation, restarting the inspection period after any change in ownership or operators, and automatic presentation of any inspection involving serious or repeated violations to the Planning Commission at a public meeting for greater transparency.

The Board should not move forward with weakening oversight at the same time it is dealing with these serious enforcement failures. Adopting reduced oversight and removing the 10 year permit renewal requirement on the same day the County considers two revocations involving alleged unlicensed cultivation would send the wrong message and fail to address the enforcement gaps these cases have exposed. The Board has a responsibility to ensure that the County's cannabis program protects the health, safety, and welfare of the public and protects the environment.

Please pull Item 5.10 from the consent agenda, hear it after Items 6.5 and 6.6, retain annual inspections and the existing 10 year permit expiration and renewal requirement, and continue the ordinance so stronger safeguards can be fully considered before final adoption.

Thank you for including this comment in the public record.