

Sarah Mayer *Public Comment - Autumn Brands*

#4



**From:** Jared Ficker <Jared@axiomadvisors.com>  
**Sent:** Tuesday, April 23, 2024 8:46 AM  
**To:** sbcob  
**Cc:** Steve Lavagnino; Joan Hartmann; Supervisor Das Williams; Laura Capps; Supervisor Nelson; Autumn Shelton  
**Subject:** Item #4 Autumn Brand comments  
**Attachments:** Item 4 - Autumn Brands Comments 4-22-2024.pdf

**Caution:** This email originated from a source outside of the County of Santa Barbara. Do not click links or open attachments unless you verify the sender and know the content is safe.

Please see the attached comment letter from Autumn Brands on Agenda Item 4. Thank you for your consideration.



April 22, 2024

Board of Supervisors  
Clerk of the Board of Supervisors  
105 E. Anapamu Street, Suite 407  
Santa Barbara, CA 93101  
[sbcob@countyofsb.org](mailto:sbcob@countyofsb.org)

Subject: Board of Supervisors Meeting 04/23/24: Item 4 - Briefing on Cannabis Odor Abatement Plan Compliance Monitoring in Santa Barbara County

Dear Chair Lavagnino and Honorable Supervisors,

Autumn Brands has been an originating member of CARP Growers and support their comments and specific recommendations to the Board provided by separate letter.

Thank you for taking the time to research and discuss the issue of odor compliance and Odor Abatement Plans with regards to the cannabis ordinances and the Carpinteria community. While we agree that this is a complex issue, we also are confident that we have met the existing ordinance standards for odor control and our property is not near sensitive receptors such as residentially zoned property and schools. We have faithfully participated in odor inspections and have not received complaints about our operations. We even amended our Odor Abatement Plan after originally approved by the County to include the tiered-response approach that CARP Growers and the Santa Barbara Coalition for Responsible Cannabis negotiated. At all times, we have been responsive to the community and the County in our efforts to reduce cannabis odor in our community.

We were pleased to see the information contained in your Board letter affirmed that cannabis operations are largely controlled for sensitive receptors as required in the cannabis ordinances. It's reflective of the substantial amount of time, money, and resources operators have been expending to address cannabis odor in Carpinteria.

Since the inception of our operations, Autumn Brands seeks to be a good neighbor and a leading operator in our community. While we are effectively managing our operations' odors today, we are open to considering additional control measures beyond the requirements of the ordinances. For our farm, this will require a significant power upgrade. We commenced the power upgrade for our site in 2016 with Southern California Edison and were able to get clarity on requirements to

commence permitting in 2021. Today, we are still significantly far from resolving the permitting requirements for a potential power upgrade for our operation. We have learned of several infrastructure and financial barriers that will likely exceed \$1,000,000 just for a power upgrade to our farm, rendering it financially infeasible especially when we are already in compliance with the odor control requirements for the cannabis ordinances. That said, we are willing to consider tax rebates or other financial incentives to offset the costs to further invest in an odor control system that may exceed the requirements of the ordinances.

Finally, I would strongly recommend that the Board carefully consider direction to staff about a singular approach to odor control. Not all sites are the same and will require the same odor control technology. There are many variables to consider and we support further research to inform the board on policy options. Any recommendations for Best Available Control Technology needs to be reconciled with the unique variables for each operation and not a one-sized-fits-all approach.

We are happy to share our experience with the Board, staff and the public to inform further recommendations to improve cannabis odor control. I urge the Board and staff to work further with us and the public. Historically, the County staff have been reluctant to be involved in the work we were doing with the Santa Barbara Coalition for Responsible Cannabis via CARP Growers. We appreciate the renewed interest in being more proactive, but we implore the Board to develop more incentive-based policy approaches as the viability of our businesses are barely sustainable in current market conditions. Cannabis operations are a substantial revenue contributor to the County and unlike most business we are taxed on our gross income which is untethered to our net income or profit which remains a challenge in this market.

We look forward to participating in any forums, science, and research as the Board and staff further consider options to manage cannabis odor.

Thank you for your consideration,

/s/ Autumn Shelton  
Chief Financial Officer and Partner  
Autumn Brands, LLC