

**CARPINTERIA**
Sanitary District

Phone (805) 684-7214 • Fax (805) 684-7213

May 10, 2021

Santa Barbara County Board of Supervisors
105 East Anapamu Street
Santa Barbara, California 93101**Subject: Ordinance to amend Chapter 16, Article III, entitled "County Retail Food Code"
Microenterprise Home Kitchen Operations**

Dear Chair Nelson and Members of the Board:

The Carpinteria Sanitary District (District) is an independent special district providing wastewater collection, treatment and disposal services to the residents and businesses of the City of Carpinteria and surrounding unincorporated areas of the Carpinteria Valley since 1928.

Discharge of fats, oil and grease (FOG) to the sanitary sewer system is a serious problem for wastewater utilities, as these materials congeal in gravity sewer pipelines, causing blockages and contributing to sanitary sewer overflows (SSOs). SSOs are highly regulated in California based on potential impacts to public health and water quality.

The District implements a formal Grease Control Program that sets forth uniform permitting, maintenance and monitoring requirements intended to control the discharge of FOG from food service establishments and reduce the potential for SSOs in our community. Physical grease management devices are required for all restaurants, cafeterias, cafes, fast food outlets, schools, and other facilities in Carpinteria with the potential to discharge FOG.

Santa Barbara County records indicate there are currently twenty Residential Cottage Food Operators (CFOs) located within the District's service area. These CFOs are not permitted or regulated by the District and do not have grease management devices. Routine inspection and maintenance activities have identified excessive grease in sewer laterals serving some of these residences, as well as FOG accumulation in main sewers and sewer lift stations downstream of known CFOs.

As the Board considers the subject ordinance to expand code language and allow Microenterprise Home Kitchen Operations (MEHKOs), the District respectfully requests that the County include measures or requirements to control or limit the discharge of FOG from these operations (CFOs and MEHKOs). These could include specific best management practices for FOG control, requirements to register with or obtain permits from the local wastewater utility, or restrictions on the types of foods prepared in CFOs and MEHKOs.

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The District would welcome the opportunity to work with County staff on Ordinance revisions that would add appropriate FOG control language and reasonably support sewer collection agencies County-wide in their efforts to minimize grease blockages and prevent SSOs.

Thank you for the opportunity to comment on the ordinance. Please don't hesitate to contact me at (805) 684-7214 x113 or by email at lancel@carpsan.com if we can provide additional information.

Sincerely,
CARPINTERIA SANITARY DISTRICT

A handwritten signature in black ink, appearing to read "Lance Lawhon", written in a cursive style.

Lance Lawhon
Engineering Technician