

Sarah Mayer

# Public Comment

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**From:** David Billesbach <DavidB@pacificdutchgroup.com>  
**Sent:** Monday, April 22, 2024 4:50 PM  
**To:** sbcob  
**Subject:** Public Comment for BOS Hearing Item #4 on 4/23/2024  
**Attachments:** Public Comment Letter- Pacific Dutch Group Compliance Department.pdf

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Compliance Department



Pacific Dutch Group, LLC

Hello Honorable Members of the County Board of Supervisors,

This letter is being written on behalf of the Compliance Department at Pacific Dutch Group. We operate International, which is one of the farms located near Carpinteria High School. To help eliminate odors from this sensitive area, we are transitioning from odor producing flower cultivation, to non-odorous immature plant cultivation, in addition to installing Envinity odor scrubbing systems. We are currently 80% complete with this transition and have already noticed significant reductions in odor at this site. Full transition will be complete by early summer.

We also operate Rincon Point on the 5700 Block of Casitas Pass Road. We're currently in process of eliminating 30% of our cultivation area, which will further reduce the potential for odor in the Carpinteria Area.

We're committed to working with the County and community to help resolve the odor issues that seem to have overshadowed the benefits that this industry provides to Santa Barbara County.

Regardless of whether Odor Abatement Plan requirements get updated, improvements to odor issues have already been made and will continue to be made by operators and County Compliance Staff. This is currently demonstrated by the Odor Complaint Map and the Map of Odor Detection provided by the County for this hearing.

Before making any final decisions on how to proceed with addressing odor concerns, I urge the Board to consider the costs and benefits of redoing the Cannabis Ordinance. New regulations would only be applicable to new operations, which are almost nonexistent due to the dismal state of the industry.

Spending years of valuable County resources to implement and enforce new regulations on an almost non-existent group of operators seems to be an inefficient use of taxpayer dollars. The costs to the County would greatly exceed the intended benefits. These resources should instead be spent on other County Programs to improve the lives of community members, like ongoing compliance and enforcement.

As demonstrated by the Board Letter for this hearing, Compliance Staff and Geosyntec have been making significant improvements on enforcing the existing ordinance. Use of the Nasal Ranger will soon be able to help Staff verify if an operator is meeting Odor Abatement Plan requirements and verify odor complaints.

Once complaints are verified, the existing Ordinance allows County staff to require installation of additional odor abatement equipment. Additional Ordinance updates will not be necessary to achieve the desired odor reductions from sensitive areas.

I respectfully request that the Board consider using County resources to support Compliance Staff's continued improvements to enforcing the existing Ordinance's Odor Abatement Plan requirements. Using valuable County resources on costly regulatory updates instead of improving ongoing compliance will only make market conditions more favorable to non-tax paying black market competitors. Please support Legal Agriculture in Santa Barbara County.

Thank you for taking the time to read this letter.