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Sheila de la Guerra **Public Comment**

From: David Diamant <david@axiomadvisors.com>
Sent: Tuesday, April 23, 2024 1:07 PM
To: sbcob; Joan Hartmann; Laura Capps; Supervisor Nelson; Steve Lavagnino
Cc: Graham Farrar; Katy Hall
Subject: Item #4 Glass House Brands comments
Attachments: Item 4 - Glasshouse Comments 4-22-24-final.pdf



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Please see the attached comment letter from Glass House 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

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,

Glass House Brands is one of the founding members of CARP Growers and supports their comments and specific recommendations to the Board provided in a separate letter. Glass House Brands CEO, Graham Farrar, has served as past President of CARP Growers.

Thank you for directing the County Executive Office and the Planning and Development Department to prepare this updated status report regarding the Odor Abatement Plans; detailing the successes and challenges that affect the Residents, the County and cannabis operators.

Glass House Brands is fully committed to maintaining its compliance according to State and local requirements. It has always been an objective of being good neighbors to all who work and live in Carpinteria. Glass House can confidently assert that we have gone above the ordinance requirements. Even though our operations are NOT in close proximity to sensitive receptors, we have conducted our own research and development, at significant cost, and spent time and resources, to understand the odor issue and come up with solutions to continue to remain in compliance. At our Casitas farm, we have installed multiple carbon scrubbers including rearranged configuration of existing carbon scrubbers at the request of the Santa Barbara Coalition for Responsible Cannabis to ensure the maximum efficiency of odor control in greenhouses near the road, at considerable cost, and are in the process of completing the installation of carbon scrubbers per our land use approval and OAP to continually improve our already robust systems. When the carbon scrubber installation process is completed, the substantial odor abatement upgrades will cost over \$250,000. Also, in an effort to reduce odors

we have ceased processing (a significant contributor to odor) at our Casitas facility. These improvements at the Casitas facility have resulted in a reduction in odor, but it should be noted that odor associated from this facility was not affecting sensitive receptors with the vapor-phase system. This was done primarily to reduce the experience of odor on the road which is not a sensitive receptor. So, at a considerable expense we agreed to do more, integrated that into our OAP, and are currently installing scrubbers throughout our Casitas facility.

We have always been proactive and responsive to issues concerning the subject of cannabis odor in and around Carpinteria as evidenced by the agreement between the Santa Barbara Coalition for Responsible Cannabis and CARP Growers, as well as the detailed tiered-response system outlined in our OAPs.

We were encouraged to read the findings contained in the Board letter regarding the significant progress that has been made in the reduction of cannabis odor near sensitive receptors in Carpinteria. This is a direct reflection of the effort the operators have invested to address this issue. It is also evidence of the operators continued cooperation with the County and their commitment to adhere to all compliance measures present in the ordinance.

While we understand the desire to continue to improve the OAPs over time (including but not limited to the changing control technology), we would like to suggest the consideration of tax credits or the exploration of alternative financial incentives to offset the operator odor control system costs that may exceed the requirements of the ordinances.

From our experience operating multiple farms in Carpinteria in multiple locations, the costs to operators, and the optimal control technology needed for each farm, are site specific and must be informed by science. We would strongly recommend that the Board carefully consider direction to staff about a “one-size-fits-all” approach with regards to OAPs and control technology. Even farms not located near sensitive receptors have their own idiosyncrasies. A few of these variables include individual farming practices and SOPs, proximity of greenhouses to public roads, weather, and traffic patterns.

Glass House Brands readily welcomes any and all of the Board members, as well as County Staff, to tour our farms and review and discuss our odor control systems. We have been encouraged that the County is using third party consulting resources to inspect operators’ facilities. However, the costs associated with inspections have been extreme and should be re-evaluated. With the extreme costs of odor control we think it’s important to make sure limited financial resources are efficiently spent the most impactful areas to improve odor control. Glass House Brands has demonstrated a commitment to odor control with its facilities despite infrastructure and permitting challenges. We would encourage the Board to direct staff and County consultants to work with operators to better understand the odor control barriers and assist with navigating issues to further improve odor control system, especially when improvements exceed ordinance requirements.

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

Thank you for your time and consideration,

/s/Katy Hall
Director of Compliance
Glass House Brands