

Katherine Douglas

Public Comment



From: Whitney Collie <whitney@coastalbloomsnursery.com>
Sent: Thursday, March 13, 2025 4:00 PM
To: sbcob; Steve Lavagnino; Laura Capps; Supervisor Nelson; Joan Hartmann; Roy Lee; Peter Dugre
Subject: Item D6 Comment Letter
Attachments: CARP Growers Comment Letter Item D6.pdf

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Good Afternoon Chair, Supervisors and Clerk,

Please see CARP Growers' comment letter for item D6 at Tuesday's hearing attached.

Thank you,
Whitney Collie

Whitney Collie
VP of Compliance
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Carpinteria Association for Responsible Producers (CARP) Growers
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March 13, 2025

Santa Barbara County Board of Supervisors
105 East Anapamu Street
Santa Barbara, CA 93101

Subject: Cannabis Ordinance Odor Amendments

Dear Chair Capps and Supervisors,

CARP Growers is writing in support of the proposed technology change to Multi Technology Carbon Scrubbers and generally in support of the additional proposed amendments. Below are comments on the areas outlined in the Planning and Development staff memorandum and some important additional suggestions we have on the cannabis ordinance.

Cannabis Odor Thresholds

Establishing an odor threshold at the property line is a substantial change in policy. The Nasal Ranger manual defines a reading of 4 D/T as "faint", 7 D/T as "noticeable" and 15 D/T as "strong". An odor threshold standard exceeding 7 D/T appears to be the lowest level where some might experience odor as offensive, whereas for most individuals, levels exceeding 15 D/T is more typical of odor being offensive.

Clarifying a recognition threshold versus a detection threshold ensures the odor reading is a cannabis specific odor. An operator has no control over background odor (i.e. lemon tree, diesel truck, mulch) and cannot prevent odors exceeding the determined d/t at property line if background odors are at or above the odor threshold. We are proposing the below redlines to the threshold language.

*The Odor Abatement Plan must prevent **cannabis odors** from ~~being measured at~~ **exceeding a recognition threshold of seven (7) D/T with a Nasal Ranger by a certified Nasal Ranger operator** for a duration of a consecutive three (3) minute period as measured at the property line of a commercial cannabis facility.*

As we know, odor is subjective, and one certified user could get a reading of 4 D/T while another reads 7 D/T. As currently proposed, one of these readings would warrant a violation and one would not. A reading above 7 D/T at the property line would create a clearer standard for both operators and those enforcing the ordinance.

Our additional recommendation is to add the below which would be consistent with recommendations in the Nasal Ranger operations manual:

Two field olfactometer observations in a one-hour period separated by at least 15 minutes each.

We believe having at least two field measurements for a three-minute duration in a one-hour period separated by at least 15 minutes each will be a much more accurate characterization of odor particularly when measuring at property line.

Use of Nasal Ranger Technology

While Nasal Rangers have their imperfections, given the technology available today, we believe it is our best option for in the field, real time odor readings.

Public Odor Complaints

Finally, we feel changes should be made to the language related to complaints and how it effects implementation of the ordinance. The community has requested that the burden of policing odor be handled by the County. Additionally, staff have not been able to verify public odor complaints. We believe complaint handling and follow-up is the responsibility of Planning and Development staff and suggest removing public complaint triggers in the ordinance. We recommend modification of the ordinance language related to public complaints as follows:

6. Cannabis Odor Threshold. *Measurements of cannabis odor from commercial cannabis activities shall not ~~equal seven~~ exceed (7) D/T for the duration of a consecutive three (3) minute period(s) as measured at the property line of a commercial cannabis facility within a one-hour period separated by 15 minutes using the Nasal Ranger odor measurement technology and procedures. The operator shall implement corrective actions as determined by the Department if a facility is found non-compliant with the cannabis odor threshold.*

a. *Cannabis odor complaint. The Department will evaluate the following types of cannabis nuisance odor complaints and may require corrective actions to be implemented if the Department determines cannabis odor measured at the property line exceeds the threshold. in response to these complaints:*

~~1) Three complaints (filed with the Department's complaint form) are received from individuals regarding cannabis nuisance odors within a 60-day period and the Department determines cannabis odor measured at the property line exceeds the threshold; or~~

~~2) Cannabis odor complaints (filed with the Department's complaint form) are received from five or more individuals in a 24-hour period and the Department determines cannabis odor from the facility exceeds the threshold.~~

Inspections should be conducted at staff discretion and odor issues found should trigger a violation. Community complaints should still be used by staff to gather data, which staff can use to evaluate odor issues, and recognize patterns, but publicly made complaints should not trigger an immediate site visit unless staff deems it necessary.

Conclusion

While CARP Growers members are generally supportive of the proposed ordinance amendments and their intent, we request your board carefully consider our recommendations. CARP Growers members are committed to addressing odor issues and the framework outlined with our recommendations is a step in the right direction. We look forward to working with the Board, staff and the community to implement ordinance amendments that better address odor control.

Thank you for consideration of our comments.

Sincerely,



Whitney Collie
President
CARP Growers