



To: Santa Barbara Board of Supervisors

December 3, 2021

Re: CRESCO (3860 Foothill, Case # 21-00048)

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For over a year, in the Carpinteria Valley, the Santa Barbara Coalition for Responsible Cannabis (SBCRC) has focused almost exclusively on cannabis cultivation odor issues. We have reached meaningful agreements with CARP Growers & its members, CRESCO being one of them, on expanded odor response protocols and a process leading to upgraded odor control technologies.

The issue of nuisance level cannabis odors is exacerbated in Carp because of:

- 1/ cannabis cultivation conducted in vented greenhouses, exposing intensely odorous air to the outside, thereby encouraging odor migration at the mercy of existing meteorological conditions.
- 2/ densely concentrated operations in an approximate 3 square mile area which, by the County's own admission, makes odor source identification, & therefore odor enforcement, virtually impossible;
- 3/ license stacking, resulting in very large cannabis operations interspersed among residential, agricultural, educational & recreational properties;
- 4/ Carp's substandard road & electrical infrastructure acting as impediments to implementation of evolving, more effective technology for objective odor measurement, odor source identification & odor control;
- 5/ the continued operation of many unsubstantiated, expanded and odor enforcement-immune legal nonconforming operations, contributing to irresponsible operators acting without fear of consequences.

The frequency of intense odor episodes has decreased but they have by no means been eliminated. Most responsible cannabis operators agree that the status quo is unacceptable & the resultant identification of Carp with the skunky smell of cannabis operations reflects badly on the Carp community. They also agree that the odor problem in Carp is fixable & they want to drive the fix. The fix must be grounded in technology. And we need to support and encourage those that embrace and advance innovation.

Essentially, there are three elements to the technology of cannabis odor minimization: objective measurement of cannabis odors; accurate odor source identification; unintrusive odor control. Without all three, odor enforcement is problematic. The Agreement outlined steps to move forward, but requires responsible growers to embrace advances in each area, and significantly, agree to implement the new technologies and take all steps needed to stop odors offsite.

CRESCO's OAP demonstrates its willingness to be one of the leaders to initiate testing, evaluation & implementation of cutting-edge technologies which offer improvement in the three elements listed above. Accordingly, SBCRC supports at least the odor control aspect of the CRESCO project.

Appellant raises other issues beyond the scope of the Coalition's focus which are important to the Carp community. The Coalition urges fair & studied consideration of those issues.

Thank you for your time & consideration.

Rob Salomon  
For Santa Barbara Coalition for Responsible Cannabis