

January 20, 2021

Ms. Karen Kissler  
Alternatives, a Health Collective  
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**Subject: Odor Mitigation Feasibility**

Dear Ms. Kissler:

We understand Alternatives, a Health Collective (Alternatives) is proposing a project named Alternatives East at 2300 Bethards Drive in Santa Rosa, CA. Unit A of the property will be used for a cannabis dispensary and product storage area (the facility). The City of Santa Rosa (the City) would like assurance that the operations will comply with the odor control standards specified in the City zoning code for a cannabis business.

Yorke Engineering (Yorke) has prior experience with odor mitigation and odor mitigation plans in a variety of industries including pet food manufacturing, publicly owned wastewater treatment plants, and at cannabis grow operations and retail locations. The following discussion is based on that experience, our understanding of the facilities' operations, and odor mitigation technology.

## **BACKGROUND**

We understand that Alternatives East will be a cannabis dispensary facility in which no packaging, processing, trimming, or drying of cannabis will be conducted. Alternatives East will occupy Unit A in a single story multi-tenant building. All cannabis will be pre-packaged and purchased from state licensed cultivators and manufacturers through state-licensed distribution facilities. Retail of properly pre-packaged products will have significantly reduced odors compared to cannabis production facilities or loose product facilities.

Unit A is 2,249 square feet (SF) and the building is approximately 18,700 SF. We understand that the heating, ventilation, and air conditioning (HVAC) system has been reconfigured and Unit A now has a dedicated system. Yorke also understands that local ventilation will be placed above the door to help prevent odors from migrating outside the space when the door is opened. Alternatives also intends to purchase carbon filters capable of handling 9,800 cfm of air flow and has indicated that they will minimize air leaks from Unit A to the rest of the building through use of sealed doors and windows where allowed by code, and using automatic quick-closing doors.

## **POSSIBLE ODOR MITIGATION MEASURES**

It is our opinion that as currently configured and with the planned addition of local ventilation above the entrance door, an odor mitigation plan can be developed and implemented that will result in no substantial odors outside the proposed facility. Alternatives East has proposed, and Yorke recommends, that the odor mitigation plan and associated ventilation system be designed and certified by an appropriate professional and maintained properly. The city requires that a

professional engineer certify the odor mitigation plan. An odor mitigation plan should address the following building aspects and either implement these measures or explain why they are not necessary:

- Organic compound control systems, such as carbon adsorption, to reduce the terpenes and other organic molecules which contribute to odors;
- Maintaining negative pressure inside the Unit to ensure that all air gets ventilated through any applicable control systems;
- Sealing all potential sources of other air leaks from inside the facilities;
- A monitoring and inspection plan to provide early detection of potential issues with odor mitigation equipment;
- An action response plan should an odor complaint be received;
- A maintenance plan which will ensure consistent and proper operation of equipment; and
- Training for staff.

Although the measures above should be adequate, there are additional control measures which can be utilized if the above measures prove insufficient. These may include;

- Operate the HVAC system to achieve higher air changes per hour than normally required by retail spaces;
- Use active enzyme sprays;
- Reducing the inventory of particularly odorous products;
- Double entries and/or targeted air flows (e.g. air knives);
- Facility humidity control to enhance the carbon control efficiency; and
- Backdraft dampers on any air intakes.

It would not be necessary to employ all of the above measures. The primary source of odors would be identified, and the appropriate measure(s) would be selected. Yorke has experience with cannabis facilities which have achieved no significant odors outside of their facilities by implementing some, or all, of these elements.

## **CITY REQUIREMENTS**

According to the Santa Rosa City Code 20-46.050 (H) Cannabis Businesses shall incorporate and maintain adequate odor control measures such that the odors of Cannabis cannot be detected from outside of the structure in which the Business operates. Applications for Cannabis Businesses shall include an odor mitigation plan certified by a licensed professional engineer that includes the following:

1. Operational processes and maintenance plan, including activities undertaken to ensure the odor mitigation system remains functional;
2. Staff training procedures; and

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3. Engineering controls, which may include carbon filtration or other methods of air cleansing, and evidence that such controls are sufficient to effectively mitigate odors from all odor sources. All odor mitigation systems and plans submitted pursuant to this subsection shall be consistent with accepted and best available industry-specific technologies designed to effectively mitigate cannabis odors.

If Alternatives Dispensary addresses this list of potential odor controls, they will have considered all the measures that Yorke has seen as “accepted and best available industry-specific technologies designed to effectively mitigate cannabis odors”. We have experience with systems employing combinations of these measures which effectively mitigate odors.

## CONCLUSION

Alternatives Dispensary has expressed a desire to mitigate odors to the point where no substantial odors are present outside the facilities, to comply with Santa Rosa City Code. Alternatives dispensary has designed the facility to have separate ventilation to outside, and air is not circulated back into the building. The addition of 9,800 cubic feet per minute of ventilation through carbon filters should be sufficient to create a negative pressure in the facility. This should be confirmed when a full odor mitigation plan is developed by a licensed Professional Engineer (P.E.). Finally, Alternatives has indicated that they will take measures to minimize air leaks from Unit A to the rest of the building (sealed doors and windows where allowed by code, automatic closing doors when possible, etc.). These engineering design measures, when coupled with proper maintenance and training which will be fully defined in an odor mitigation plan, should minimize any odors from the facility.

It is our opinion, based on previous experience, that the measures described above are sufficient as an initial design. If instances of substantial odors arise, additional measures can be employed as required by the city. As of now, the facility is not operational, so Yorke cannot determine with certainty that the odor mitigation measures are sufficient. Alternatives Dispensary has proposed that an odor mitigation plan be developed by an appropriate professional to ensure its adequacy once the facility draws nearer to being operational. Should you have any questions or concerns, please contact me at (949) 482-8528.

Sincerely,



James Yorke  
Mechanical Engineer  
Yorke Engineering, LLC  
[JRYorke@YorkeEngr.com](mailto:JRYorke@YorkeEngr.com)

cc: Susie Murray, [SMurray@srcity.org](mailto:SMurray@srcity.org), City of Santa Rosa  
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Attachments:

1. Santa Rosa City Code Title 20 Division 4 Chapter 20-46 (Zoning, Specific Land Uses, Cannabis)
2. Estimate for Ventilation and Equipment

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**ATTACHMENT 1 – SANTA ROSA CITY CODE TITLE 20 DIVISION 4  
CHAPTER 20-46 (ZONING, SPECIFIC LAND USES, CANNABIS)**

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#### **20-46.050 General operating requirements.**

The following general operating requirements are applicable to all Cannabis Businesses. In addition, requirements specific to each Cannabis Business subtype are set forth in Sections [20-46.060](#) (Cannabis Cultivation), [20-46.070](#) (Cannabis Support Uses) and [20-46.080](#) (Cannabis Retail and Delivery).

- A. Dual licensing. The City recognizes that State law requires dual licensing at the State and local level for all Cannabis Businesses (Medical and Adult Use). All Cannabis Operators shall therefore be required to diligently pursue and obtain a State cannabis license at such time as the State begins issuing such licenses, and shall comply at all times with all applicable State licensing requirements and conditions, including, but not limited to, operational standards such as, by way of illustration but not limitation, background checks, prior felony convictions, restrictions on multiple licenses and license types, and locational criteria.
1. Operators in good standing. Cannabis Businesses which have received land use permit approval pursuant to this Chapter prior to or within 10 months of date the State begins issuing State licenses shall be considered "operators in good standing". Operators in good standing shall be allowed to obtain building occupancy permits and commence operations in compliance with City permit approvals while diligently pursuing all necessary State licenses and subject to any deadlines established by the State. Operators in good standing shall demonstrate to the City that complete applications for all necessary State licenses and agency permits have been filed and are being pursued by the applicant in compliance with deadlines established by the State.
  2. New operators. Cannabis Businesses which have received land use permit approval pursuant to this Chapter after the State begins issuing State licenses and after the 10-month transition period noted in Subsection A.1 above, shall not be allowed to commence operations until the Cannabis Business can demonstrate that all necessary State licenses and agency permits have been obtained in compliance with any deadlines established by the State.
  3. Existing permitted operators. Cannabis Businesses which have received land use permit approval prior to the adoption of this Chapter shall be required to comply with all operational requirements set forth in this Chapter. In addition, a Cannabis Business that has obtained a valid land use permit for medical use issued prior to the adoption of this Chapter may incorporate adult use into their land use permit upon issuance of a Zoning Clearance by the Department. The Zoning Clearance shall, as a condition of issuance, require compliance with all operational provisions of this Chapter. The Zoning Clearance to incorporate adult use in addition to or in place of medical use shall not authorize any physical or operational expansion of the facility unless determined in compliance with this Chapter.
  4. Grounds for revocation. Once State licenses and agency permits become available, failure to demonstrate dual licensing in accordance with this Chapter and within any deadlines established by State law shall be grounds for revocation of City approval. Revocation of a local permit and/or a State license shall terminate the ability of the Cannabis Business to operate until a new permit and/or State license is obtained.
- B. Minors. Medical Cannabis Businesses shall only allow on the premises a person who is 18 years of age or older and who possesses a valid government-issued photo identification card. Adult Use Cannabis Businesses shall only allow on the premises a person who is 21 years of age or older and who possesses a valid government-issued photo identification card.
- C. Inventory and tracking. Cannabis Operators shall at all times operate in a manner to prevent diversion of Cannabis and shall promptly comply with any track and trace program established by the State.
- D. Multiple permits per site. Multiple Cannabis Businesses proposed on any one site or parcel shall be granted permit approval only if all of the proposed Cannabis Businesses and their co-location are authorized by both local and State law. Cannabis Operators issued permits for multiple license types at the same physical address shall maintain clear separation between license types unless otherwise authorized by local and State law.
- E. Building and fire permits. Cannabis Operators shall meet the following requirements prior to commencing operations:
1. The Cannabis Operator shall obtain a building permit to conform with the appropriate occupancy classification and be in compliance with Chapter 18 of the City Code.
  2. The Cannabis Operator shall obtain all annual operating fire permits with inspections prior to operation.
  3. The Cannabis Operator shall comply with all applicable [Health and Safety Code](#) and [California Fire Code](#) requirements related to the storage, use and handling of hazardous materials and the generation of hazardous waste. Cannabis Operators shall also obtain all required Certified Unified Program Agency (CUPA) permits including completing a California Environmental Reporting System (CERS) submission for hazardous materials inventory that meet or exceed State thresholds and any waste generation for accountability.
  4. Access with a Fire Department lock box for keys to gates and doors shall be provided.
- F. Transfer of ownership or operator. A permittee shall not transfer ownership or operational control of a Cannabis Business or transfer a permit for a Cannabis Business to another person unless and until the transferee obtains a zoning clearance from the Department stating that the transferee is now the permittee. The zoning clearance shall commit the transferee to compliance with each of the conditions of the original permit.
- G. Security. Cannabis Businesses shall provide adequate security on the premises, including lighting and alarms, to insure the public safety and the safety of persons within the facility and to protect the premises from theft. Applications for a Cannabis Business shall include a security plan that includes the following minimum security plan requirements:
1. Security cameras. Security surveillance video cameras shall be installed and maintained in good working order to provide coverage on a 24-hour basis of all internal and exterior areas where Cannabis is cultivated, weighed, manufactured, packaged, stored, transferred, and dispensed. The security surveillance cameras shall be oriented in a manner that provides clear and certain identification of all individuals within those areas. Cameras shall remain active at all times and shall be capable of operating under any lighting condition. Security video must use standard industry format to support criminal investigations and shall be maintained for 60 days.
  2. Alarm system. A professionally monitored robbery alarm system shall be installed and maintained in good working condition. Section [6-68.130](#) of the City Code requires that an alarm permit be obtained by the Santa Rosa Police Department prior to installing an alarm system. The alarm system shall include sensors to detect entry and exit from all secure areas and all windows. Cannabis Operators shall keep the name and contact information of the alarm system installation and monitoring company as part of the Cannabis Business's on-site books and records. Cannabis Operators shall identify a local site contact person who will be responsible for the use and shall provide and keep current full contact information to the Santa Rosa Police Department dispatch database as part of the alarm permitting process.
  3. Secure storage and waste. Cannabis Products and associated product waste shall be stored and secured in a manner that prevents diversion, theft, loss, hazards and nuisance.
  4. Transportation. Cannabis Businesses shall implement procedures for safe and secure transportation and delivery of Cannabis, Cannabis Products and currency in accordance with State law.
  5. Locks. All points of ingress and egress to a Cannabis Business shall be secured with Building Code compliant commercial-grade, non-residential door locks or window locks.
  6. Emergency access. Security measures shall be designed to ensure emergency access in compliance with the [California Fire Code](#) and Santa Rosa Fire Department standards.
- H. **Odor** control. Cannabis Businesses shall incorporate and maintain adequate **odor** control measures such that the odors of Cannabis cannot be detected from outside of the structure in which the Business operates. Applications for Cannabis Businesses shall include an **odor** mitigation plan certified by a licensed professional engineer that includes the following:
1. Operational processes and maintenance plan, including activities undertaken to ensure the **odor** mitigation system remains functional;
  2. Staff training procedures; and
  3. Engineering controls, which may include carbon filtration or other methods of air cleansing, and evidence that such controls are sufficient to effectively mitigate odors from all **odor** sources. All **odor** mitigation systems and plans submitted pursuant to this subsection shall be consistent with accepted and best available industry-specific technologies designed to effectively mitigate cannabis odors.
- I. Lighting. Interior and exterior lighting shall utilize best management practices and technologies for reducing glare, light pollution, and light trespass onto adjacent properties and the following standards:
1. Exterior lighting systems shall be provided for security purposes in a manner sufficient to provide illumination and clear visibility to all outdoor areas of the premises, including all points of ingress and egress. Exterior lighting shall be stationary, fully shielded, directed away from adjacent properties and public rights-of-way, and of an intensity compatible with the neighborhood. All exterior lighting shall be Building Code compliant and comply with Section [20-30.080](#) (Outdoor Lighting).
  2. Interior light systems shall be fully shielded, including adequate coverings on windows, to confine light and glare to the interior of the structure.
- J. Noise. Use of air conditioning and ventilation equipment shall comply with the Chapter [17-16](#) (Noise). The use of generators is prohibited, except as short-term temporary emergency back-up systems.

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**ATTACHMENT 2 – ESTIMATE FOR VENTILATION AND EQUIPMENT**

# Estimate

## SPW Inc.

Monster Gardens  
 235 Classic Ct  
 Rohnert Park, CA 94928  
 Phone: 707-588-8002

Order #	Date
S1121696	01/06/2021



Bill To:
Karen Kissler 2300 Bethards Dr Santa Rosa, CA 95405

Ship To:
Karen Kissler 2300 Bethards Dr Santa Rosa, CA 95405

Customer: Karen Kissler
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Contact: Karen Kissler
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Sales Rep	Payment Terms	FOB Point	Carrier	Ship Service	Date Scheduled
Jade	Prepay	Origin	In Store		01/05/2021

Item #	Type	Number	Description	Unit Price	Qty Ordered	Total Price
1	Sale	ff_af_008	Air Box 4 Plus Inline Filter, 3500cfm, 12" flange	\$625.40	1 ea	\$ 625.40
2	Sale	ff_if_055c	Can Fan Q-Max Fan 12", w/muffler 1709cfm	\$487.55	1 ea	\$ 487.55
3	Sale	NG-736994	Ideal Air Silver/Black Ducting 12" x 25'	\$39.75	1 ea	\$ 39.75
4	Sale	ff_af_030	Phresh Filter 4" x 12", 200cfm	\$87.53	2 ea	\$ 175.06
5	Sale	ff_if_119	Phat JetFan 4", 160cfm	\$80.94	2 ea	\$ 161.87
6	Sale	ff_af_029	Phresh Filter 8' x 24', 750cfm	\$162.93	6 ea	\$ 977.61
7	Sale	ff_if_121	Phat Jetfan 8", 710cfm	\$179.66	6 ea	\$ 1,077.93
8	Sale	ff_af_025	Phresh Filter 10" x 39", 1400cfm	\$239.75	1 ea	\$ 239.75
9	Sale	ff_if_122	Phat Jetfan 10", 1065cfm	\$208.55	1 ea	\$ 208.55
10	Sale	ff_af_039	ONA Breeze Dispenser Fan, 35cfm	\$36.05	1 ea	\$ 36.05
11	Sale	ff_af_127	Ona Pro Gel Gallon Jar	\$34.08	1 ea	\$ 34.08
12	Sale	t_rt_016	Autopilot Single Outlet 7-Day Grounded Digital Programmable Timer	\$14.23	1 ea	\$ 14.23
13	Shipping	Shipping	Shipping In Store Pickup	\$0.00	1 ea	\$ 0.00

<b>Subtotal:</b>	<b>\$4,077.83</b>
<b>Sales Tax:</b>	<b>\$356.81</b>
<b>Total:</b>	<b>\$4,434.64</b>

Estimate Only. Shipping rates expire in 10-days and product estimate expires in 30-days from the date generated. Estimate must be authorized in writing (email and fax copies are acceptable). Changes in item quantities may result in adjustments to pricing. Shipping marked "to be determined"