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February 11, 2021

To Whom It May Concern:

We have reviewed the attached odor mitigation plan, dated February 11, 2021, for Sunstone Advisors of Santa Rosa, CA.

It is our understanding that the attached plan meets, or exceeds, the requirements of the City of Santa Rosa for cannabis odor mitigation.



Sincerely,  
Matthew Torre, Registered Professional Engineer  
15000 Inc

**City of Santa Rosa**  
**March 2/2021**  
**Planning & Economic  
Development Department**

# **ODOR CONTROL & MITIGATION PLAN**

February 11, 2021

## **Sunstone Advisors**

330 Yolanda Avenue (Parcel #044-072-007)  
350/358 Yolanda Avenue (Parcel #004-072-008)  
Santa Rosa, CA 95404

**Report prepared by**  
15000 Inc.

## **Policy**

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Document a process to limit objectionable odors from the project area utilizing building system components and adopted odor control plan.

Under California Occupational Health and Safety Act (“CalOSHA”) and Bay Area Air Quality Management District (“BAAQMD”) regulations, cannabis businesses do not have a specific set of regulations that govern their operations. However, Alicia Rose of Sunstone Advisors (the “Applicant”), will nonetheless maintain a high standard for the air quality plans for all aspects of its proposed Cannabis Cultivation, Manufacturing, Distribution, Dispensary, and Facility (TYPE-1A, TYPE-6, TYPE-10, TYPE-11) at 330 and 350/358 Yolanda Avenue, Santa Rosa, CA 95404 (“Facility”).

Generally, the Applicant will meet and/or exceed the standards set by the City of Santa Rosa (“City”) Cannabis Ordinance, the Sonoma County (“County”) Code (including sections 26-88-250 through 26-88-256), California Labor Code §§6300 et seq., and Title 8, California Code of Regulations §§ 332.2, 332.3, 336, 3203, 3362, 5141 through 5143, 5155, and 14301, as published in the CalOSHA Policy and Procedures Manual C-48, Indoor Air Quality as applicable to other facilities.

Pursuant to State of California (“State”) regulations [California Energy Code, Section 120.1(b)2], mechanical fresh air ventilation must meet a minimum of 0.20 cubic feet per minute (“CFM”) per square foot of retail conditioned floor area, and 0.15 CFM for all other spaces. Since existing State air quality regulations do not contain provisions specific to cannabis businesses, the Applicant will comply with these general State standards when designing the ventilation systems and air filtrations systems for the entire Facility. Each separate operation within the Facility building will have its own individual “air-scrubber” systems, as described below.

## **Purpose**

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To minimize and eliminate the off-site odor of cannabis caused by normal business practices.

## **Scope**

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Exterior of facility and surrounding areas.

## **Responsibilities**

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Business Owner/Operator (BO/O) is to provide, implement and supervise an odor mitigation plan.

## **General Procedures**

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Implementing and maintaining building systems to effectively minimize transmission of odor between building and surrounding areas.

- BO/O shall supervise installment and maintenance of an air treatment system to ensure there is no off-site odor of cannabis overly detectable from adjacent properties or the community. Air treatment systems consist of carbon filtration on the exhaust side of the ventilation system and negatively pressurizing the facility in relation to the exterior ambient condition.
- Staff members should immediately report any odor problems to the BO/O, who will take corrective action, implement upgrades to the system, upgrades to the facility or to the internal handling process of product within the facility to further deter odors.
- If such upgrades require the approval of any Agency Having Jurisdiction (AHJ), the BO/O shall seek and gain such approval prior to implementing new systems and/or procedures.

It is critical to the success of our organization that our various plans remain transparent to the community, so all stakeholders are aware of the importance of mitigated cannabis odors.

This mitigation plan and all associated records will be made available to the public for review and documents can be requested at our facility. All requests for documentation shall occur via written request only (email is acceptable).

The Facility will have the following onsite functions: Administrative Processing Areas, Secure Storage, Offices, Lounge Area, Manufacturing, Distribution, Retail, and Cultivation. The company will provide packages within state-approved containers for distribution to distribution centers and/or retail outlets. The handling of product will require a properly engineered odor control system in order to mitigate the release of odors to the surrounding properties and community.

## **Active Measures**

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All cannabis products will be securely stored in secure rooms with video camera surveillance. The various HVAC systems serving spatial uses listed in the subsequent section will be tied into their respective exhaust fan systems with activated carbon filter for odor control. Exhaust will be terminated at a minimum of 10'-0" from property lines and from fresh air intakes into the building.

## **Air Pressure & Carbon Filter Control**

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The Reception and Courtyard areas (TYPE-10) comprising the main entry will be kept under negative pressure by means of a roof mounted exhaust fan and carbon filter, Koch DuraPURE with impregnated adsorption media (or equal). The exhaust system shall be electrically interlocked with the space conditioning system serving the area with an exhaust air quantity greater than the outside air quantity to ensure negative pressure is maintained whenever the system is operational. The space conditioning system will be provided with MERV-8 rated carbon filters, Koch OdorKleen ES (or equal), to further treat odors which are recirculated within the airstream.

The Retail, Secure Storage, and Vault area classification (TYPE-10) will be kept under negative pressure by similar means as described above serving the Reception and Courtyard areas to minimize nuisance odor proliferation through exfiltration of the building.

The Marketplace, adjacent storage areas and dry storage (TYPE-10) shall be kept under negative pressure by similar means as described within the Reception and Courtyard sections to minimize nuisance odor proliferation through exfiltration of the building.

The Demonstration Lab extraction area (TYPE-6) will be kept under negative pressure by means of a rooftop utility set electrically interlocked with the make up air system which shall exhaust a great quantity of air than what is delivered to the space. The utility set will be provided with Camfil CabCarb CG with broad spectrum activated carbon media (or equal) to treat odors present in the exhaust air stream. The utility set will discharge with a high velocity nozzle directing the discharge air away from the surround area.

The Distribution Office and Distribution Storage (TYPE-11) shall be provided with a recirculation fan and filter within the room (or located above with ducted air outlets) to minimize odors within the space. As these two spaces are all interior (no exterior wall), negative pressure is not required to be maintained within via an exhaust air system, as the adjacent (exterior) spaces will be kept at negative pressure safeguarding against the release of nuisance odors.

The VIP Lounge (TYPE-10) will be provided with a stand-alone HVAC system inclusive of a 'smoke-eater' filtration unit by Pure Natural Systems, Interceptor-2000 (or equal) comprised of three stages of filtration: Stage-1 consists of a MERV-8 filter, Stage-2 consists of a 60% filter capable of removing heavy smoke, and Stage-3 consists of discharge through a HEPA filter to capture any remaining smoke, dust and/or odor particles. The space shall be kept at negative pressure to minimize nuisance odors through exfiltration with an exhaust quantity greater than the outside air quantity and discharged from the space through a Koch DuraPURE (or equal) carbon filter. It should be noted that while onsite consumption in the form of smoke or inhalable products of any kind is currently prohibited in this jurisdiction, this premise will have a system in place to treat odor and/or smoke associated, should that use change.

The Greenhouse (TYPE-1A) will be provided with a stand alone HVAC system with exhaust and carbon filter, Koch DuraPURE (or equal) to maintain negative pressure in order to minimize nuisances odor proliferation through exfiltration of the space.

Each filter will be provided with a magnehelic differential pressure gauge, Dwyer Series 2000 (or equal) to measure the pressure drop across the filter, with pre-filter and final filter set points marked to indicate useable lifespan of the filter. The Applicant shall adhere to the manufacturer's listed guidelines for filter replacement.

## **Best Available Technology**

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The combination of activated carbon exhaust air filtration and building pressure control represent the current best available technology. This building shall be provided with MERV-8 filters on the fresh air intake side to limit particulate intake to the space and to enhance the overall quality of the supply air to the occupants. Backdraft dampers shall be provided in the fresh air duct main to further minimize the release of odors if system(s) are not in use.

## **Air System Design**

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The Facility shall have no operable windows or be kept locked and sealed at all times. All doors shall be sealed with proper weather stripping, keeping circulating and filtered air inside the facility.

On site usage of cannabis products is strictly prohibited while on the property. This will assist in mitigating odors to the surrounding neighbors.

## **Monitoring, Detection and Mitigation: Method for Assessing Impact of Odor**

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The importance of cannabis odor mitigation is very well understood and we shall make decisions that best to prevent the issue of odor to the surrounding areas. If odors are detected outside the facility this plan shall serve as a guideline to provide corrective action.

The manager/supervisor of the Facility shall assess odors on a daily basis (see *Monitoring* for expanded responsibilities).

## **Monitoring**

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The manager/supervisor shall assess the on-site and off-site odors daily for the potential release of objectionable odors. The manager/supervisor on duty shall be responsible for assessing and documenting odor impacts on a daily basis.

The closest adjacent businesses include;

- Merz Enterprises: 324 Yolanda Avenue, Santa Rosa, CA 95404
- Kings Auto Sales: 358 Yolanda Avenue, B, Santa Rosa, CA 95404
- Malm Fireplace Center: 368 Yolanda Avenue, Santa Rosa, CA 95404
- Magic Motors: 358 Yolanda Avenue, Santa Rosa, CA 95404
- RV Specialist: 340 Yolanda Avenue, Santa Rosa, CA 95404

## **Mitigation**

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Should objectionable off-site cannabis odors be detected by the public and we are notified in writing, the following protocols will take place immediately:

- Investigate the likely source of the odor.
- Utilize on site management practices to resolve the odor event.
- Take steps to reduce the source of objectionable odors.
- Determine if the odor traveled off-site by surveying the perimeter and making observations of existing wind patterns.
- Document the event for further operational review.

If employees are not able to take steps to reduce the odor-generating source, they are to immediately notify the facility manager, who will then notify the BO/O. All communication shall be documented and the team shall create a proper solution, if applicable. If necessary we shall retain our certified engineer to review the problem and make recommendations for corrective action/s.

## **Staff Training**

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All employees shall be trained on how to detect, prevent and remediate odor outside our facility and all corrective options outlined herein.

## **Odor Detection Documentation**

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The Odor Detection Form (ODF) shall be provided to those who suspect objectionable odors emanating from inside the facility. ODFs are available per request, on-site.

We shall maintain records of all odor detection notifications and/or complaints that will include the remediation measures employed. The records shall be made available to the AHJ or the general public on request. All requests shall be in writing (email is acceptable).

## Odor Detection Form

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Name of Reporting Party:

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Phone Number:

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Email Address:

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Date:

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Time:

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Location of Odor:

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Weather Conditions:

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Date/Time of Notification:

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Notification Method:

☐ Email ☐ Online ☐ In Person

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## Administrative Use Only

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*Mitigation Response Taken:*

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*Date/Time Measures Employed:*

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*Were Mitigation Measures Successful?*

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*Signature/Date/Time:*

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