

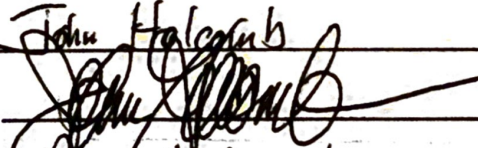
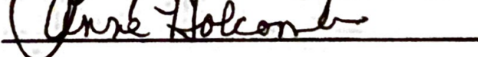
Special Use Docket SUA-21-02 (MM Ft Grant Rd Appeal Holcomb, rehearing)

YES, I SUPPORT THIS REQUEST. Please note, supporting an appeal denies the Special Use and prohibits subsequent project construction. Please state your reasons:

See Attached

NO, I DO NOT SUPPORT THIS REQUEST. Please note, not supporting an appeal upholds the Planning Commission Approval of the Special Use and allows subsequent project construction. Please state your reasons:

(Attach additional sheets, if necessary)

PRINT NAME(S): John Holcomb Anne Holcomb
SIGNATURE(S):   20119001 D 20119002
20119001 H
20119001 G
20119001 K

YOUR TAX PARCEL NUMBER: 201190015 (the eight-digit identification number found on the tax statement from the Assessor's Office) or you look it up online by going to "Mapping Resources" on our website (<https://www.cochise.az.gov/development-services/home>)

Your comments will be made available to the Board of Supervisors. Submission of this form or any other correspondence becomes part of the public record and is available for review by the applicant or other members of the public. Written comments must be received no later than Friday June 11, 2021 to be included in the staff report to the Board of Supervisors.

RETURN TO: Christine McLachlan, Planner II
Cochise County Development Services
1415 Melody lane, Building F
Bisbee, Arizona 85603
cmdachlan@cochise.az.gov

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The Planning & Zoning Commission was presented an odor mitigation plan for outdoor cannabis cultivation by the Applicant. Applicant's staff stated that no cannabis odor would leave the property. This is a false and misleading statement.

Cannabis is very pungent and the odor is difficult to neutralize. The proposed outdoor growing acreage of 63 acres is exceptionally large. While this acreage is small for other crops grown in the area, it is huge for cannabis. In 2019 the largest outdoor grow for cannabis was listed at 33 acres. This has since been eclipsed by 80 acres planned for Tularosa, New Mexico and 100 acres near Ontario, Canada. The 100 acres would be the largest outdoor grow in the world. The trends seem to be for larger and larger outdoor grow acreage. One notable exception is Pinal County, Arizona which has an outdoor grow maximum of 10 acres. (Pinal County Development Services Code Section 2.191.010.C)

After extensive online research, we have not been able to find one reference to the successful use of any type of outdoor odor mitigation. In Washington and Colorado, regulators address odor as an air quality issue. The Puget Sound Clean Air Agency (PSCA) odor regulations set a "Best available control technology" (BACT) standard. For marijuana growers, PSCA has determined that BACT means no detectible cannabis odor outside the facility property line. PSCA does not believe outdoor cannabis production facilities can continuously achieve the "no odor outside the property boundary" standard without the proper use of an enclosure that routes emissions to a carbon absorption system. PSCA also does not allow odor masking, such as spraying a curtain of scented oil vapor around the perimeter of greenhouses and will not accept it as a control technology. (Powell 2019) Bart Schaneman, in "Stop Making Scents", states that "Cannabis has a strong odor, and finding a solution to control it-be it in an indoor facility, greenhouse, or outdoors-comes with significant challenges." (Schaneman 2019) It is apparent that at this time, there is not a clear, successful best practices standard for outdoor odor mitigation.

Our online research conclusions on the lack of effective outdoor odor mitigation were confirmed by the Odor Mitigation Plan recently submitted by The Pharm in Docket SU21-15 (The Pharm Expansion). It states "Outdoor Grow; Unfortunately, cannabis outdoor grow operations do not have successfully documented plans due to the uncontrolled environment associated with an outdoor grow. Current odor mitigation technologies are designed for controlled climates." Controlled climates are typically greenhouses.

We request that the outdoor grow portion of this application be denied.

Literature Cited:

Powell, L, Odor Issues are Moving to the Forefront as More States Allow Recreational Cannabis; The Pipeline: Cannabis Law Advisor, January 11, 2019
Schaneman, B., Best Practices in Cultivation, Stop Making Scents, mjbizdaily.com, August 2019, p. 118-121

Additional Supporting Documents:

Chelan County, Washington County Code, Chapter 11.100 CANNABIS Regulations, passed February 2, 2021 <https://www.codepublishing.com/WA/ChelanCounty/html/Chelco11/Chelco11100.html>

**"Odor Issues Are Moving to the Forefront as More States Allow Recreational Cannabis" [https://
www.cannabislawadvisor.com/2019/01/11/odor-issues-moving-forefront-states-allow-recreational-
cannabis/](https://www.cannabislawadvisor.com/2019/01/11/odor-issues-moving-forefront-states-allow-recreational-cannabis/)**

**"Stop Making Scents", Marijuana Business Magazine, August 2019 [https://mjbizdaily.com/
digital-issues/2019-07-Aug/118/](https://mjbizdaily.com/digital-issues/2019-07-Aug/118/)**

**"Marijuana Stinks" Here's What Cities, Businesses and Neighbors Can Do About It" [https://
www.thecannifornian.com/cannabis-business/marijuana-stinks-heres-cities-
businesses-neighbors-can/](https://www.thecannifornian.com/cannabis-business/marijuana-stinks-heres-cities-businesses-neighbors-can/)**