From: <u>Executive Director</u>

To: \*CI-StPaul Contact-Council

**Subject:** Position Regarding Air Quality and Odor Control in Cannabis Cultivation and Manufacturing

**Date:** Wednesday, September 11, 2024 12:55:13 PM

Attachments: [FINALv3] Position Letter Regarding Cannabis Cultivation and Processing in St Paul.pdf

Dear Council President Jalali and City Council Members:

I hope this message finds you well.

I am writing to present the attached position letter regarding 'Regarding Air Quality and Odor Control in Cannabis Cultivation and Manufacturing' from the St. Anthony Park Community Council (SAPCC).

We respectfully request that it be shared with and considered by the St. Paul City Council alongside the staff and community presentations at today's upcoming meeting (Second Public Hearing, Wednesday, September 11th).

Thank you for your attention to this matter.

Very best regards, ~Zev R.

Zev Radziwill (he/him)
Executive Director
St. Anthony Park Community Council

District 12 • Saint Paul www.sapcc.org | zev@sapcc.org

c: 612-770-2872 | o: 651-649-5992

**Schedule a Meeting**→





September 3, 2024

Office of the City Council
Attn: Council President Jalali
310 City Hall | 15 Kellogg Blvd. West
Saint Paul, MN 55102

## RE: Position Regarding Air Quality and Odor Control in Cannabis Cultivation and Manufacturing

Dear Council President Jalali and City Council Members:

On behalf of the St. Anthony Park Community Council (SAPCC), we are writing to express our concerns regarding the potential impact of cannabis cultivation and manufacturing on air quality and odor control in our community.

In St. Anthony Park, many of our neighborhoods—especially South St. Anthony—are closely surrounded by potential cannabis cultivation and manufacturing facilities. Experiences from other cities demonstrate that cannabis cultivation and manufacturing can lead to compromised air quality, affecting the well-being of nearby residents. This issue goes beyond a simple nuisance—poor air quality can pose serious health risks, particularly for individuals with asthma and other respiratory conditions.

For these reasons, cities such as Denver require that cultivation and manufacturing not be located within 1,000 feet of residential districts. Other cities also have strong requirements that such facilities implement the necessary equipment to prevent the release of pollutants and odors into surrounding neighborhoods. As cannabis production expands, it is vital that all facilities, regardless of their size or type, be held to the same high standards of air quality and odor management to protect the health and quality of life for all community members.

We strongly urge the City Council to create a buffer zone separating cannabis cultivation and manufacturing from our residential neighborhoods and ensure that all cannabis cultivation facilities, no matter their size or type, are equipped with the necessary technology and standards to prevent odors and harmful air pollutants from impacting the surrounding

community. This is not just a regulatory matter—it is a public health issue that must be prioritized in the interest of our residents.

While we appreciate the efforts of the St. Paul Planning Commission in drafting the Cannabis Zoning Ordinance Amendments, we believe there is a critical need to prioritize the health and welfare of residents as these facilities are introduced. We respectfully request that the health and safety of the St. Anthony Park community be placed at the forefront of any decisions related to cannabis cultivation and processing.

Sincerely,

Sincerely,

Zev Radziwill

**Executive Director** 

(612) 770-2872

director@sapcc.org

on behalf of the

Directors of the

St. Anthony Park Community Council

From: <u>Executive Director</u>

To: \*CI-StPaul Contact-Council

**Subject:** Position Letter Regarding Cannabis Cultivation and Processing in St. Anthony Park

**Date:** Tuesday, September 3, 2024 1:24:01 PM

Attachments: [FINALv2] Position Letter Regarding Cannabis Cultivation and Processing in St Paul - September 3 2024.pdf

Dear Council President Jalali and City Council Members:

I hope this message finds you well.

I am writing to present the attached UPDATED letter regarding 'Cannabis Cultivation and Processing' from the St. Anthony Park Community Council (SAPCC).

We respectfully request that it be shared with and considered by the St. Paul Planning Commission alongside the staff presentation at the upcoming meeting on September 4th.

Thank you for your attention to this matter.

Very best regards,

~Zev R.

Zev Radziwill (he/him)

**Executive Director** 

St. Anthony Park Community Council

District 12 • Saint Paul

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<u>Schedule a Meeting</u>→





September 3, 2024

Office of the City Council
Attn: Council President Jalali
310 City Hall | 15 Kellogg Blvd. West
Saint Paul, MN 55102

## RE: Position Letter Regarding Cannabis Cultivation and Processing in St. Anthony Park

Dear Council President Jalali and City Council Members:

The St. Anthony Park Community Council (SAPCC) wishes to convey our position on the matter of Cannabis Cultivation and Processing within our community, particularly in light of the proposed City of St. Paul ordinance.

As representatives of the St. Anthony Park neighborhood, we are deeply committed to preserving the health, safety, and quality of life of our residents. With this in mind, we have carefully considered the potential impacts of cannabis cultivation and processing activities on our community.

We are particularly concerned about the documented issues related to odor control stemming from cannabis cultivation and processing, as exemplified by the 'Skunky odor' communities have experienced in Santa Barbara County (CA) and the City of Denver (CO).

Given our community's residential areas are in close proximity to areas that are being "zoned" for cannabis cultivation and processing, we are especially sensitive to any potential disturbances that could affect the well-being and health of our residents.

Furthermore, we have noted with concern the lack of clear standards for measuring air quality and requiring effective odor control technologies and odor abatement plans in the proposed City of St. Paul ordinance. We believe that any regulatory framework must include objective and enforceable standards to mitigate the potential negative impacts on our community.

In light of these concerns, the St. Anthony Park Community Council (SAPCC) has adopted the following position:

- We oppose any proposed cannabis cultivation and processing activities that could adversely
  affect the health, safety, and quality of life of St. Anthony Park residents.
- We call for the adoption of comprehensive regulations by the City of St. Paul that include clear standards for measuring air quality and implementing effective odor control technologies and abatement plans at cannabis cultivation and processing facilities.

- We disagree with the characterization of these facilities under Sec. 65.780 as producing
   "minimal off-site impacts," unless they install excellent, often expensive, odor control. Because
   these compounds are detectable at very low concentrations in the air, they will negatively
   impact residents, visitors, and people who work in the area, even at considerable distances from
   the operation.
- With respect to the Saint Paul Climate Action Plan, we ask the city to consider ways to limit the high energy requirement, water, fertilizer, and pesticide use, and waste production of indoor cannabis growing operations. In addition, a public education program should be undertaken regarding the health and safety impacts of second-hand cannabis smoke.
- We urge all relevant stakeholders to prioritize the health, well-being, and livability of not only St.
   Anthony Park and its residents in any decisions regarding cannabis-related activities but all of the City of St. Paul.

And finally, in the latest draft of the Cannabis Zoning Ordinance amendments (dated July 26, 2024) from the St. Paul Planning Commission— where we've previously shared our position—we identified an issue that makes us believe our concerns were not fully considered:

Section 65.780 (Limited Production and Processing under 15,000 SF) includes standards and conditions, such as a requirement that no odors are allowed beyond the property line. However, Section 65.810 (for facilities over 15,000 SF) does NOT list any similar standards. Map 4 on page 21 of the draft amendments shows that most of District 12 allows both sizes of manufacturing, with South St. Anthony effectively "landlocked" by potential cannabis manufacturing. We strongly recommend that the City Council inquire whether odor requirements apply to Section 65.810 - and ensure that they do.

Thank you for your consideration of this important issue for the St. Anthony Park community. We respectfully request that our position be taken into consideration in any discussions or decision-making processes related to cannabis cultivation and processing in our community and that actions be taken to ensure our concerns are addressed.

Sincerely,

Zev Radziwill Executive Director (612) 770-2872 director@sapcc.org on behalf of the
Directors of the

St. Anthony Park Community Council