



May 29, 2026

Re: Public Comment for Board Agenda – Request for Rule 210 Cost and Effectiveness Review

Dear APCD Board Members,

I am writing to respectfully request that the Board direct staff to conduct a review of the cannabis permitting program's costs and effectiveness since the Rule 210 amendments became effective on July 1, 2024. My colleague Amanda Clark, Compliance Manager at Coastal Blooms Nursery made a public comment January 15, 2026, that has yet to have been addressed.

#### Regulatory Overlap and Financial Impact

The Rule 210 amendments have resulted in a highly duplicative and costly permitting process. Coastal operators have spent over seven years adhering to the County's strict Cannabis Land Use Ordinance. Under that program, our Odor Abatement Plans (OAPs) are already engineered by professionals, vetted by county consultants, and strictly enforced by Planning and Development (P&D).

Despite our requests for APCD to waive permits for compliant operators, the District implemented a "cost-recovery" program. The real-world consequences of this program—without the promised coordination with P&D or the promised Community Advisory Committee (CAC) cost review are stark:

- A 300% increase in permit fees for comparable projects, based on our direct experience securing three APCD permits.
- No expansion in regulatory scope or technical complexity to justify the cost.
- No measurable environmental or community benefit, as APCD's oversight simply mimics what P&D already enforces.

#### Formal Request to the Board

As a follow-up to the implementation of Rule 210, we respectfully ask the Board to take the following actions:

1. Direct staff to complete the promised program review in coordination with the CAC.
2. Require staff to either demonstrate how this program meaningfully improves odor management, or provide permit waivers for operators whose odor control is already fully permitted, monitored, and enforced by Planning and Development.

Thank you for your time, consideration, and continued leadership on this matter.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Whitney Collie".

Whitney Collie  
VP Compliance, Coastal Blooms Nursery, LLC