

April 12, 2021

Ciara Ristig
Santa Barbara County
Planning and Development
624 W. Foster Road
Santa Maria, CA 93455

Re: Santa Barbara County Air Pollution Control District Comments on Givens Outdoor Cannabis Cultivation, 20CUP-00000-00001

Dear Ciara Ristig:

The Santa Barbara County Air Pollution Control District (District) has reviewed the referenced project, which consists of cannabis cultivation including 3.42 acres of cultivation in hoop structures, 952 square feet (SF) of shipping containers for storage and equipment, a 10 kW solar power system, and a 2,790 watt (<5 hp) liquified petroleum gas-powered portable emergency generator. The project also proposes non-cannabis agricultural food crop improvements including new hoop structures, new shipping containers, demolition of a mobile storage unit, and asphalt paving. Several existing permitted non-cannabis structures will remain onsite. The project proposes two full-time employees and seven to 12 temporary employees during harvest time. No new water wells or grading are required for the project. Cannabis manufacturing is not proposed. Odor abatement includes use of vapor phase technology with Ecosorb CNB 100. The subject property, a 94.19-acre parcel zoned AG-II-100 and identified in the Assessor Parcel Map Book as APN 083-180-013, is located at 9491 Santa Rosa Road in the unincorporated area of Buellton.

District rules and regulations may apply to various aspects of the cannabis industry. This may include the need to obtain one or more permits or registrations. County staff and the cannabis operator should carefully review the District's *Cannabis Permitting Requirements & Nuisance Enforcement Table and Advisory on Air Quality and Cannabis Operations* (available at www.ourair.org/cannabis). These resources provide local agencies and cannabis operators guidance regarding the air quality aspects of this industry.

Based on the project description and information that has been provided, the project does not require a District permit. However, if the project description changes, the applicant should refer to the District's cannabis permitting webpage at www.ourair.org/cannabis to determine if any equipment or operations will require District permits.

The proposed project is subject to the following **regulatory requirements** that should be included as conditions of approval in the applicable land use permit:

1. All portable diesel-fired construction engines rated at 50 brake horsepower or greater must have either statewide Portable Equipment Registration Program (PERP) certificates or District permits prior to grading/building permit issuance. Construction engines with PERP certificates are exempt from the requirement for a District permit, provided they will be on-site for less than 12 months.

2. The applicant is required to complete and submit an **Asbestos Demolition/Renovation Notification or an EXEMPTION** from Notification for Renovation and Demolition (District Form ENF-28 or APCD Form ENF-28e), which can be downloaded at www.ourair.org/compliance-forms for each regulated structure to be demolished or renovated. Demolition notifications are required regardless of whether asbestos is present or not. The completed exemption or notification shall be presented, mailed, or emailed to the Santa Barbara County Air Pollution Control District with a minimum of 10 working days advance notice prior to disturbing asbestos in a renovation or starting work on a demolition. The applicant shall visit www.ourair.org/asbestos to determine whether the project triggers asbestos notification requirements or whether the project qualifies for an exemption.
3. Asphalt paving activities shall comply with District Rule 329, *Cutback and Emulsified Asphalt Paving Materials*.
4. Construction/demolition activities are subject to District Rule 345, *Control of Fugitive Dust from Construction and Demolition Activities*. This rule establishes limits on the generation of visible fugitive dust emissions at demolition and construction sites, includes measures for minimizing fugitive dust from on-site activities, and from trucks moving on- and off-site. Please see www.ourair.org/wp-content/uploads/rule345.pdf. Activities subject to Rule 345 are also subject to Rule 302, *Visible Emissions* and Rule 303, *Nuisance*.

In addition, the District recommends that the following **best practices** be considered for inclusion as conditions of approval, in the interest of reducing emissions of criteria air pollutants, toxic air contaminants, and greenhouse gases:

1. At a minimum, prior to occupancy, any feasible greenhouse gas reduction measures from the following sector-based list shall be applied to the project:
 - Energy use (energy efficiency, low carbon fuels)
 - Water conservation (improved practices and equipment, landscaping)
 - Waste reduction (material re-use/recycling, composting, waste diversion/minimization)
 - Architectural features (green building practices, cool roofs)
 - For additional information on greenhouse gas mitigation and potential strategies, see www.ourair.org/ghgmitigation-sbc.
2. Any chemical used for deodorizing systems should not cause adverse impacts to the community. Low-VOC (volatile organic compound) or no-VOC compounds are recommended, as well as compounds that do not contain toxic air contaminants (TACs) as identified by the State of California. The comprehensive list of TACs can be found at www.arb.ca.gov/toxics/healthval/contable.pdf. If odor control systems use chemicals that contain TACs, the County should assess the potential for health risk by performing a refined Health Risk Assessment.

If you or the project applicant have any questions regarding these comments, please feel free to contact me at (805) 961-8878 or via email at WaddingtonE@sbcapcd.org.

April 12, 2021

Page 3

Sincerely,

A handwritten signature in black ink, appearing to read "Emily Waddington". The signature is written in a cursive, flowing style.

Emily Waddington
Air Quality Specialist
Planning Division

cc: Amy Taylor [email only]
David Harris, Manager, District Engineering Division [email only]
William Sarraf, Supervisor, District Engineering Division [email only]
Planning Chron File