

May 14, 2021

Alia Vosberg
Santa Barbara County
Planning and Development
624 W. Foster Road
Santa Maria, CA 93455

Re: Santa Barbara County Air Pollution Control District Comments on New Era Cannabis Cultivation, 19CUP-00000-00037

Dear Alia Vosberg:

The Santa Barbara County Air Pollution Control District (District) has reviewed the referenced project, which consists of 10.16 acres of outdoor cannabis cultivation under hoop structures, installation of eight 80 square-foot metal storage containers for non-cannabis storage, and 10 unpaved employee parking spaces. Cannabis processing and manufacturing will not occur onsite. The project will involve a maximum of five regular employees and eight seasonal employees. The applicant has provided an Odor Management Plan that consists of project siting practices, operational best management practices, and vegetative wind breaks. Additionally, the Odor Management Plan outlines corrective actions which may include installation of an active vapor phase odor abatement system. No grading or new water wells are proposed. Electricity will be provided by PG&E and no generators are proposed. The subject property, a 100.49 acre parcel zoned AG-II-100 and identified in the Assessor Parcel Map Book as APN 099-090-011, is located at 2720 Cebada Canyon Road in the unincorporated Lompoc area.

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.

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 toxic air contaminants:

1. 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.

Sincerely,



Emily Waddington
Air Quality Specialist
Planning Division

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