



**Santa Barbara County  
Air Pollution Control District**

January 9, 2018

Jessica Metzger  
Santa Barbara County  
Long Range Planning  
123 E Anapamu Street  
Santa Barbara, CA 93101

**Re: APCD Comments on Odor Abatement Plans under the Cannabis Land Use Ordinance and Licensing Program, 17ORD-00000-00004**

Dear Ms. Metzger:

The Santa Barbara County Air Pollution Control District (APCD) appreciates the opportunity to provide comments on the Final Environmental Impact Report (EIR) for the Cannabis Land Use Ordinance and Licensing Program. APCD's mission is to protect the people and the environment of Santa Barbara County from the effects of air pollution. The potentially significant odor impacts identified in the EIR have been the subject of public comments throughout the process of preparing the EIR and the draft ordinance. In addition, the APCD has received numerous odor complaints related to cannabis growing and processing over the years. Because the APCD does not have the authority to take enforcement action to address odors from growing crops, the odor mitigation measures identified in the EIR will be critical to addressing potential odor impacts.

The EIR identifies Odor Abatement Plans (OAPs) as mitigation for potential odor impacts. We strongly support the provisions in the plans to identify a responsible individual, to train staff on how to respond to odors, to ensure that odor complaints are promptly reported to the appropriate County department, and to provide for an enforceable process to require additional controls at site that generate recurring odor emissions. Two odor abatement strategies are identified as the most likely solutions for growing operations that are indoors or in greenhouses: activated carbon filtration systems and vapor phase systems.

Properly designed, installed, and operated activated carbon filtration systems are a widely used technology, and can be effective when used in appropriate situations. The APCD does not have experience with vapor-phase systems in Santa Barbara County, so we cannot comment on their potential effectiveness. The EIR provides a discussion of their use in other locations. For any unfamiliar technology such as this, it will be critical that the system is designed and installed by professionals who are experienced with the technology. Furthermore, the staff who will operate the system should be thoroughly trained in the operation and maintenance of the system, and have ongoing support from the system manufacturer or installer.

For any system that is intended to neutralize odors by emitting compounds into the air to chemically react with cannabis odors, the APCD would recommend the following considerations:

1. The system should not emit a Hazardous Air Pollutant<sup>1</sup>, as defined by the USEPA, or a Toxic Air Contaminant<sup>2</sup>, as defined by the California Health and Safety Code.
2. The system should not use excessive amounts of odor neutralizing compounds, to minimize their release into the air.
3. A vapor phase odor control system may require a District Permit to Operate, depending on the composition of the chemicals used and the method of operation.

Thank you for the opportunity to comment on the EIR. Please contact me at (805) 961-8879 or by email at [cbe@sbcapcd.org](mailto:cbe@sbcapcd.org) if you have any questions.

Sincerely,



Ben Ellenberger  
Manager  
Technology and Environmental Assessment Division

cc: Kaitlin McNally, Manager, Compliance Division  
TEA Chron File

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<sup>1</sup> <https://www.epa.gov/haps/initial-list-hazardous-air-pollutants-modifications>

<sup>2</sup> <https://www.arb.ca.gov/toxics/id/taclist.htm>