



**Santa Barbara County
Air Pollution Control District**

April 10, 2017

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

Re: APCD Response to the Notice of Preparation of an Environmental Impact Report for 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 Notice of Preparation (NOP) of a Draft 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. As the County of Santa Barbara develops guidelines regulating cannabis activities, we believe it is important to address potential air quality impacts.

Cannabis activities have the potential to generate nuisance odors. The EIR should address potential odors and identify measures to mitigate nuisance odor impacts. Cultivation could take many forms, for example: open fields, hoop houses, greenhouses, or indoors. The EIR should analyze potential impacts from each type of cultivation expected in the county. The analysis of each proposed mitigation measure should also provide evidence whether that measure is effective for each type of cultivation. Mitigation might take the form of establishing minimum distances from sensitive receptors, development and implementation of an odor control plan, use of odor control devices, operating practices, or some combination of these or other methods.

Processing cannabis products after harvest may include activities that are subject to permit. The EIR should address the requirement of processing activities to comply with air district regulations. These may include VOC limits on solvents used in extraction, storage and disposal requirements for VOC-containing compounds, and the requirement to obtain a permit.

Cannabis cultivation operations may use diesel-fired equipment for irrigation and/or lighting. Diesel-fired equipment is a source of toxic air emissions, criteria pollutants, and greenhouse gases. The EIR should address health risk, local air quality impacts, and greenhouse gas emissions from the use of diesel-fired equipment. It should discuss requirements for registration or permitting, and emission standards to which the equipment would be subject. Potential mitigation might include minimizing power use on-site, using grid power or on-site renewable power to the greatest extent possible, and, if diesel engines are used, using Tier 4 certified engines to the greatest extent possible.

Disposal of crop residue by burning can result in significant air quality impacts. The EIR should address how to minimize or eliminate impacts associated with burning crop residue.

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

Sincerely,

A handwritten signature in black ink, appearing to read "Ben Ellenberger". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Ben Ellenberger
Manager
Technology and Environmental Assessment Division

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