March 27, 2020

Melanie Jackson Santa Barbara County Planning and Development 624 W. Foster Road Santa Maria, CA 93455

Re: Santa Barbara County Air Pollution Control District Suggested Conditions for Santa Rita Holdings – Outdoor Cannabis Cultivation, 19CUP-00000-00018

Dear Melanie Jackson:

The Santa Barbara County Air Pollution Control District (District) has reviewed the referenced project, which consists of outdoor and nursery cannabis cultivation of approximately 3.89 acres with 3.39 acres in hoop structures. Manufacturing is not proposed. An existing residence would remain on site. The operation would require one to two full-time employees and an additional five to eight seasonal employees. No grading is proposed. The site does not require a new water well and will be served by municipal power. Emergency power will be provided by a backup battery system. The subject property, a 120-acre parcel zoned AG-II-100 and identified in the Assessor Parcel Map Book as APN 099-110-060, is located at 5423 Rancho Santa Rita Road in the unincorporated Lompoc area.

The District has prepared an *Advisory on Air Quality and Cannabis Operations* (available at www.ourair.org/land-use) that provides local agencies and cannabis operators guidance regarding the air quality aspects of this industry. The advisory discusses the District's regulatory limitations on odors from agricultural operations, recommendations for odor abatement, and cannabis-related operations that may require a District permit. This advisory should be carefully reviewed by the County and cannabis operator.

Air Pollution Control District staff have the following specific <u>advisories and recommendations</u> related to the proposed project:

- 1. 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.
- 2. Indoor and mixed-light cultivation (e.g., greenhouses) located near residential, commercial and other sensitive receptors shall abate cannabis odors through the use of containment, ventilation, filters, control and/or deodorizing systems. Outdoor cultivation and growing operations also create strong cannabis odors, and the District recommends that such operations not be located near public locations such as residences, commercial buildings, or other sensitive receptors. The District encourages the use of buffer zones to allow for maximum odor dispersion, as well as other odor abatement strategies, to avoid nuisance odors.

Air Pollution Control District staff offers the following suggested **conditions**:

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- Odor abatement strategies shall be implemented as laid out in a comprehensive odor
 abatement plan to ensure that cannabis odors are not detected by nearby residential areas or
 sensitive receptors. All odor abatement technology shall be operated according to the
 manufacturer's specifications and/or as recommended by a professional engineer or certified
 industrial hygienist. Any changes to the odor abatement chemical/solution or odor abatement
 technology shall be reviewed and approved by the County.
- 2. The application of architectural coatings, such as paints, primers, and sealers that are applied to buildings or stationary structures, shall comply with District Rule 323.1, *Architectural Coatings* that places limits on the VOC-content of coating products

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: Jason Hillenbrand [email only]

David Harris, Manager, District Engineering Division [email only] William Sarraf, Supervisor, District Engineering Division [email only]

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