



# San Diego County Air Pollution Control District

March 27, 2025

County of San Diego Planning and Development Services (PDS)  
Attn: Jessica Norton  
5510 Overland Avenue, Suite 210  
San Diego, CA 92123  
[PDS.LongRangePlanning@sdcounty.ca.gov](mailto:PDS.LongRangePlanning@sdcounty.ca.gov)

Re: Socially Equitable Cannabis Program (SCH #2023090330)

Dear Ms. Norton,

The San Diego County Air Pollution Control District (APCD) appreciates the opportunity to provide comments on the Socially Equitable Cannabis Program Draft Environmental Impact Report (DEIR) and related amendments to the San Diego County Code of Regulatory & Zoning Ordinances. Below are the SDAPCD's comments concerning the evaluation of potential air quality impacts presented in the DEIR.

## **General Comments**

The APCD is mandated under federal and state law to regulate air pollutant emissions and improve air quality to protect public health and the environment. Accordingly, the APCD operates countywide air quality permitting, monitoring, and enforcement programs to ensure compliance with applicable air pollution regulations for healthful air quality. The APCD's jurisdiction covers all of San Diego County, including both the incorporated and unincorporated areas.

Specific to this charge, is the importance of addressing the variety of emissions, along with their sources, that contribute to diminished air quality. This includes analyzing all potential emissions, including solvent recovery, volatile organic compounds (VOC's) and Toxic Air Contaminants (TAC's) in conjunction with other emission sources. Upon review, it appears that the analysis of emissions related manufacturing operations was not included in the analysis and is therefore insufficient. We recommend inclusion of manufacturing operations, as outlined below:

## **Rules and Regulations-Rule 1200**

SDAPCD believes the environmental impact from the air emissions from manufacturing operations should be considered in the EIR. Including discussion of these emissions in the EIR would also benefit future permitting actions by SDAPCD.

**Section 2.4.2.3** should include a discussion of SDAPCD Rule 1200 (Toxic Air Contaminants-New Source Review)<sup>1</sup> as manufacturing operations can be subject to permitting through District Rule 10 and therefore also subject to Rule 1200. Manufacturing operations are known by The District to use compounds such as isopropyl alcohol, hexane, and methylene chloride which are considered toxic air contaminants (TACs).

---

<sup>1</sup> [Rule 1200 - Toxic Air Contaminants-New Source Review \(02/13/2025\)](#)



**Toxic Air Contaminants related to Manufacturing Equipment**

Further, Section 2.4.3.2 should discuss the possibility of TAC emissions from manufacturing equipment. Some cannabis manufacturing facilities involve the extraction of cannabis compounds from plant matter using solvents and extraction equipment. Many of these solvents, while not only being VOCs are also TACs including compounds such as isopropyl alcohol, hexane, and methylene chloride. Operations requiring district permit would be subject to District Rule 1200 as previously discussed and would limit the health risks from these types of operations to below significant levels.

**Impact Assessment for Alternatives (Section 2.4.3.5)**

The impact assessment for operations for alternatives 2-5 do not include the VOC and TAC emissions from manufacturing operations. Section 2.4.3.5 of the DEIR states:

*Therefore, because operation of individual outdoor, San Diego County Socially Equitable Cannabis Program Draft EIR Page 2.4-23 mixed-light, and indoor cultivation sites and noncultivation uses would not exceed SDAPCD's screening thresholds, emissions would not adversely affect human health under Alternative 2. Therefore, the contribution to operational criteria pollutants and precursors would not result in greater acute or chronic health impacts compared to existing conditions under Alternative 2.*

Of note, the SDAPCD has received applications for solvent extraction operations using solvent recovery systems that have emissions up to 60 lbs. of VOC's a day, although most yield less than 10 lbs. per day of VOC. Given the potential for emissions from cannabis manufacturing operations, we further recommend inclusion of these VOC and TAC emissions in the impact assessment for comparison to screening thresholds for each of these alternatives. Consideration of these emissions in the EIR would also streamline the CEQA review timeline for applicants also requiring SDAPCD permits.

Should you have any questions about these comments or APCD requirements please contact Supervising Air Resources Specialist, Eric Luther (858) 586-2893 or [eric.luther@sdapcd.org](mailto:eric.luther@sdapcd.org).

Sincerely,

*Eric Luther*

Eric Luther  
Supervising Air Resources Specialist