



air pollution control district
SANTA BARBARA COUNTY

May 14, 2026

Darryl Mimick
City of Goleta
Planning and Environmental Review
130 Cremona Dr. Suite B
Goleta, CA 93117

Sent Via Email: dmimick@cityofgoleta.org

Re: Santa Barbara County Air Pollution Control District Suggested Conditions for Anthem Church, 24-0009-DP, 24-0005-CUP, 24-0004-CUP, 24-0010-DP, 24-0030-DP

Dear Darryl Mimick:

The Santa Barbara County Air Pollution Control District (District) has reviewed the referenced project, which consists of the construction on a vacant lot of a new two-story 22,038 square foot church with classrooms, exterior patios, play yards, and a 125-space parking lot. The church will include a sanctuary with seating of up to 500 persons, offices, facilities, a pre-school, day care, and youth groups. Grading will require 4,200 cubic yards (CY) of cut, 560 CY of fill, with 3,640 CY to be exported. The existing 3.423-acre lot will be subdivided into two parcels, with an existing church on one parcel and the new proposed church on the other. The subject property, identified in the Assessor Parcel Map Book as APN 071-170-080, is located at 6595 Covington Way in the City of Goleta.

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. Generally, construction engines with PERP certificates are exempt from District permit, provided they will be on-site for less than 12 months.
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.
3. Asphalt paving activities shall comply with District Rule 329, *Cutback and Emulsified Asphalt Paving Materials*.
4. Construction/demolition activities are subject to District Rule 345, *Control of Fugitive Dust from Construction and Demolition Activities*. This rule establishes limits on the generation of visible fugitive dust emissions at demolition and construction sites, includes measures for minimizing fugitive dust from on-site activities, and from trucks moving on- and off-site. Please see

Aeron Arlin Genet, Air Pollution Control Officer

(805) 979-8050 | ourair.org | @OurAirSBC

260 N. San Antonio Road, Suite A, Santa Barbara, CA 93110
1011 West McCoy Lane, Santa Maria, CA 93455

www.ourair.org/wp-content/uploads/rule345.pdf. Activities subject to Rule 345 are also subject to Rule 302 (*Visible Emissions*) and Rule 303 (*Nuisance*).

5. Natural gas-fired fan-type central furnaces with a rated heat input capacity of less than 175,000 British thermal units per hour (Btu/hr) and water heaters rated below 75,000 Btu/hr must comply with the emission limits and certification requirements of District Rule 352. Please see www.ourair.org/wp-content/uploads/rule352.pdf for more information.
6. Boilers, water heaters, and process heaters rated between 75,000 and 2.0 million British thermal units per hour (Btu/hr) must comply with the emission limits and certification requirements of District Rule 360. Note: Units fired on fuel(s) other than natural gas still need to be certified under Rule 360. Please see www.ourair.org/wp-content/uploads/rule360.pdf for more information.

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 criteria air pollutants, toxic air contaminants, greenhouse gases, dust and odors:

7. To reduce the potential for violations of District Rule 345 (*Control of Fugitive Dust from Construction and Demolition Activities*), Rule 302 (*Visible Emissions*), and Rule 303 (*Nuisance*), standard dust mitigations (**Attachment A**) are recommended for all construction and/or grading activities. The name and telephone number of an on-site contact person must be provided to the District prior to grading/building permit issuance.
8. The State of California considers particulate matter emitted by diesel engines carcinogenic. Therefore, during project grading, construction, and hauling, construction contracts must specify that contractors shall adhere to the requirements listed in **Attachment B** to reduce emissions of particulate matter (as well as of ozone precursors) from diesel equipment. Recommended measures should be implemented to the maximum extent feasible. Prior to grading/building permit issuance and/or map recordation, all requirements shall be shown as conditions of approval on grading/building plans, and/or on a separate sheet to be recorded with the map. Conditions shall be adhered to throughout all grading and construction periods. The contractor shall retain the Certificate of Compliance for CARB's In-Use Regulation for Off-Road Diesel Vehicles onsite and have it available for inspection.
9. At a minimum, prior to occupancy, any feasible greenhouse gas reduction measures from the following sector-based list should be applied to the project:
 - Energy use (energy efficiency, low carbon fuels, renewable energy)
 - Water conservation (improved practices and equipment, landscaping)
 - Waste reduction (material re-use/recycling, composting, waste diversion/minimization)
 - Architectural features (green building practices, cool roofs)
 - Transportation (reduce vehicle miles traveled through employee commute trip reduction programs, such as ride-sharing programs and alternative transportation options, such as public transit, local shuttles, park-and-ride lots, etc., pedestrian- and bicycle-friendly features such as sidewalks and bike racks)
 - Electric Vehicle Infrastructure (EV charger installation, installation of pre-wiring for future EV chargers)
 - For additional information on greenhouse gas mitigation and potential strategies, see www.ourair.org/ghgmitigation-sbc.

If you or the project applicant have any questions regarding these comments, please feel free to contact me at (805) 979-8334 or via email at WaddingtonE@sbcapcd.org.

Sincerely,

A handwritten signature in black ink, appearing to read "Emily Waddington". The signature is fluid and cursive, with the first name "Emily" and last name "Waddington" clearly distinguishable.

Emily Waddington,
Air Quality Specialist
Planning Division

Attachments: Fugitive Dust Control Measures
Diesel Particulate and NO_x Emission Measures

cc: Planning Chron File



air pollution control district
SANTA BARBARA COUNTY

ATTACHMENT A FUGITIVE DUST CONTROL MEASURES

Projects involving earthmoving activities are expected to manage fugitive dust emissions such that emissions do not exceed APCD's visible emissions limit (APCD Rule 302), create a public nuisance (APCD Rule 303), and are in compliance with the APCD's requirements and standards for visible dust (APCD Rule 345). The following measures should be implemented to reduce fugitive dust emissions and impacts.

- During construction, use water trucks, sprinkler systems, or dust suppressants in all areas of vehicle movement to prevent dust from leaving the site and from exceeding the APCD's limit of 20% opacity for greater than 3 minutes in any 60-minute period. When using water, this includes wetting down areas as needed but at least once in the late morning and after work is completed for the day. Increased watering frequency should be required when sustained wind speed exceeds 15 mph. Reclaimed water should be used whenever possible. However, reclaimed water should not be used in or around crops for human consumption.
- Onsite vehicle speeds shall be no greater than 15 miles per hour when traveling on unpaved surfaces.
- Install and operate a track-out prevention device where vehicles enter and exit unpaved roads onto paved streets. The track-out prevention device can include any device or combination of devices that are effective at preventing track out of dirt such as gravel pads, pipe-grid track-out control devices, rumble strips, or wheel-washing systems.
- If importation, exportation, and stockpiling of fill material is involved, soil stockpiled for more than one day shall be covered, kept moist, or treated with soil binders to prevent dust generation. Trucks transporting fill material to and from the site shall be tarped from the point of origin. The amount of excavated material or waste materials stored at the site should be minimized.
- Minimize the amount of disturbed area. After clearing, grading, earthmoving, or excavation is completed, or if previously graded areas remain inactive for more than 10 calendar days, treat the disturbed area by watering, OR using roll-compaction, OR revegetating or hydroseeding, OR by applying non-toxic soil binders until the area is paved or otherwise developed so that dust generation will not occur. All roadways, driveways, sidewalks etc. proposed to be paved should be completed as soon as possible.
- Schedule clearing, grading, earthmoving, and excavation activities during periods of low wind speed to the extent feasible. During periods of high winds (>25 mph) clearing, grading, earthmoving, and excavation operations shall be minimized to prevent fugitive dust created by onsite operations from becoming a nuisance or hazard.
- The contractor or builder shall designate a person or persons to monitor and document the dust control program requirements to ensure any fugitive dust emissions do not result in a nuisance and to enhance the implementation of the mitigation measures as necessary to prevent transport of dust offsite. Their duties shall include holiday and weekend periods when work may not be in progress.

All measures required by the Lead Agency shall be shown on grading and building plans and/or as a separate information sheet listing the conditions of approval to be recorded with the map prior to grading/building permit issuance and/or map recordation. Conditions shall be adhered to throughout all grading and construction periods. The name and telephone number of a dust control contact shall be provided to the APCD prior to grading/building permit issuance and/or map clearance. The Lead Agency shall ensure measures are on project plans and/or recorded with maps. The Lead Agency staff shall ensure compliance onsite. APCD inspectors will respond to nuisance complaints.



ATTACHMENT B CONSTRUCTION DIESEL PARTICULATE AND NO_x EMISSION REDUCTION MEASURES

Particulate emissions from diesel exhaust are classified as carcinogenic by the state of California. The following is a list of regulatory requirements and control strategies that should be implemented to the maximum extent feasible.

The following measures are required by state law:

- **Portable Engines:** All portable diesel-powered construction equipment greater than 50 brake horsepower (bhp) shall be registered with the state's portable equipment registration program (PERP)¹ OR shall obtain an APCD permit.
- **Off-Road Equipment:** Fleet owners of diesel-fueled mobile construction equipment greater than 25 hp are subject to the California Air Resource Board (CARB) In-Use Off-Road Diesel-Fueled Fleets Regulation². All off-road vehicles subject to this regulation must use renewable diesel fuel, with some limited exceptions.
- **Diesel Trucks:** Fleet owners of on-road diesel-fueled heavy-duty trucks and buses are subject to CARB's Heavy-Duty (Tractor-Trailer) Greenhouse Gas Regulation, Periodic Smoke Inspection Program (PSIP), the Statewide Truck and Bus Regulation, and the Advanced Clean Fleets Regulation to reduce emissions from trucks and buses.³
- **Idling:** Drivers of diesel-fueled commercial motor vehicles are subject to the Airborne Toxic Control Measure to Limit Diesel-Fueled Commercial Motor Vehicle Idling.⁴ Idling restrictions for off-road equipment are set forth in CARB's In-Use Off-road Diesel-Fueled Fleets Regulation.

The following measures are recommended:

- At a minimum, off-road diesel equipment should be equipped with engines compliant with, or certified to meet or exceed, CARB Tier 4 emission standards. Where available, off-road construction equipment should be zero-emission. Alternative/renewable fuels such as compressed natural gas (CNG), liquefied natural gas (LNG), or propane should be utilized to the maximum extent feasible when zero-emission is not available. Electric auxiliary power units should be used. The Lead Agency should require commitments to Tier 4 and/or zero-emission equipment in applicable bid documents, purchase orders, and contracts; successful contractors should demonstrate the ability to supply the compliant construction equipment for use prior to any ground-disturbing and construction activities.
- On-road heavy-duty equipment with model year 2014 or newer engines, or powered by zero- or near zero-emission technology, should be used whenever feasible.
- All portable generators should be powered by a source other than diesel or gasoline (i.e., battery, natural gas, propane, etc.)
- All construction equipment should be maintained in tune per the manufacturer's specifications.
- The number of construction equipment operating simultaneously should be minimized through efficient management practices to ensure that the smallest practical number is operating at any one time.
- Proposed truck routes should minimize impacts to residential communities and sensitive receptors.
- Construction staging areas should be located away from sensitive receptors such that exhaust and other construction emissions do not enter the fresh air intakes to buildings, air conditioners, and windows. Construction activity schedules and hours should be planned and adjusted as feasible to maximize distance from existing sensitive receptors and minimize exposure to air pollution.

Prior to grading/building permit issuance and/or map recordation, all measures required by the Lead Agency shall be shown as conditions of approval on grading/building plans, and/or on a separate sheet to be recorded with the map. Conditions shall be adhered to throughout grading and construction periods. The contractor shall retain onsite the Certificate of Compliance for CARB's In-Use Regulation for Off-Road Diesel Vehicles and have it available for inspection. The Lead Agency shall ensure measures are on project plans and/or recorded with maps and ensure compliance onsite. APCD inspectors will respond to nuisance complaints.

¹ <https://ww2.arb.ca.gov/our-work/programs/portable-equipment-registration-program-perp>

² <https://ww2.arb.ca.gov/our-work/programs/use-road-diesel-fueled-fleets-regulation>

³ <https://ww2.arb.ca.gov/our-work/programs/truckstop-resources/truckstop>

⁴ <https://ww2.arb.ca.gov/our-work/programs/atcm-to-limit-vehicle-idling/about>