

January 29, 2020

Stephen Peterson Santa Barbara County Planning and Development 624 W. Foster Road Santa Maria, CA 93455

Re: Air Pollution Control District Incompleteness Items for Rancho Encantado Cannabis,

19CUP-00000-00036

Dear Stephen Peterson:

The Air Pollution Control District (District) has reviewed the referenced project, which consists of 31 acres of cannabis cultivation in hoop houses. The project will employ 8 full-time employees and up to 75 seasonal employees during three harvest periods per calendar year. No structures are proposed for development and an unpermitted garage structure currently onsite would be demolished. The project does not propose manufacturing or emergency generators. Water will be provided by an existing agricultural well. The subject property, a 578.33 acre parcel zoned AG-II-100 and identified in the Assessor Parcel Map Book as APNs 083-430-032, -035, and 083-330-008, is located at 1701 highway 101 in the unincorporated area of Buellton.

The District finds the application to be incomplete and requires more information about the proposed project to determine potential air quality impacts and applicability of District prohibitory rules and other regulatory programs.

Please provide responses to the following items:

- 1. It is our understanding that an Odor Abatement Plan is required for this project. Please expand on the provided information to include all items required by the County Cannabis Land Use Ordinance, Odor Abatement Plan, Section C.6:
 - a. A floor plan, specifying locations of odor-emitting activity(ies) and emissions.
 - b. A description of the specific odor-emitting activity(ies) that will occur.
 - c. A description of the phases (e.g., frequency and length of each phase) of odor-emitting activity(ies).
 - d. Provide design drawings and technical brochures and/or vendor data for the odor control system(s) and building designs.
 - e. Designation of an individual (local contact) who is responsible for responding to odor complaints.
- If a vapor phase odor control system is proposed, please provide all chemical constituents contained in all the compounds/products used in the vapor phase system, the fraction by weight of all of the chemicals contained in such compounds, and proposed usage amounts for all such compounds per year. Please note that the District has a procedure in place for handling confidential information for cases where the chemical makeup of odor control products is

proprietary information. The District procedure for handling confidential information can be found here: www.ourair.org/wp-content/uploads/6100-020-1.pdf.

- 3. A health risk assessment should be performed if a proposed vapor phase odor control system utilizes a chemical listed on the *Consolidated Table of OEHHA/ARB Approved Risk Assessment Health Values* (see: www.arb.ca.gov/toxics/healthval/contable.pdf).
- 4. Please provide an estimation of expected energy use, water use, and waste disposal. This information is necessary to quantify the long-term indirect greenhouse gas emissions generated by the project.
- 5. Please provide the expected trip generation as a result of the proposed project, including the expected average daily trips and trip types (e.g. worker commute trips, delivery trips/trucks, etc.).

Once the necessary information is provided and reviewed for completeness, the District will submit a departmental condition letter for the project. Please ensure that all applicable District conditions are included with the Conditions of Approval for the project.

District staff has the following initial advisories on the project:

- District Permits: 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.
- Odor abatement: This project has the potential to cause odor impacts because of the nature of
 the operation. The applicant should design the project to minimize the potential for odor
 generation and public nuisance complaints through controls or abatement techniques, and
 comply with the requirements of the County's Cannabis Regulations, Section C.6.

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: Todd Kaplan
Planning Chron File