



**Santa Barbara County  
Air Pollution Control District**

Our Vision  Clean Air

February 1, 2019

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

**Re: APCD Incompleteness Items on 805 Ag. Holdings, 18DVP-00000-00013**

Dear Melanie Jackson:

The Air Pollution Control District (APCD) has reviewed the referenced project, which consists of approximately 285,000 square feet (SF) of cannabis cultivation and processing in 101 hoop structures. This would include approximately 3.5 acres of outdoor cultivation in hoop houses, 0.75 acres of outdoor nursery cultivation in hoop houses, and 11,400 SF of hoop houses for outdoor drying. The property is presently developed with 26 hoop structures containing 60,000 SF of cannabis cultivation, two 125 SF pesticide storage containers, two 125 SF nutrition storage containers, and a trailer-mounted 1,000 gallon diesel fuel storage tank. A photovoltaic solar array is proposed to provide power onsite. No new water wells are proposed and an Odor Abatement Plan is not required for this project. The subject property, two parcels of approximately 40 and 120 acres respectively, are zoned AG-II-100, identified in the Assessor Parcel Map Book as APNs 131-100-005 and 131-100-017, and located off of Autumn Road in the unincorporated area of Santa Maria.

At the County's Subdivision Development Review Committee meeting on January 24th, 2019, a representative for the project stated that the applicant is proposing the use of up to four small diesel generators for emergency use. There will be no cannabis manufacturing onsite. No odor control equipment is proposed. Grading of the site may be required to bring the current driveway up to code.

**APCD finds the application to be incomplete and requires more information about the proposed project to determine potential air quality impacts, appropriate permit conditions for the proposed land use, and applicability of APCD permit requirements, prohibitory rules, and other regulatory programs such as the state's Distributed Generation Program<sup>1</sup>.**

Please provide responses to the following items:

1. Please describe the existing and proposed electrical infrastructure on the property. Include a description of how power will be supplied to meet the electrical needs of all the existing and proposed land uses and structures on the property. Please include the expected energy output of the proposed solar array and how this will affect the overall electrical demand of the proposed project.
2. Please provide a description of all existing and proposed combustion equipment that will be installed and/or operated onsite to support the proposed project, including the four proposed diesel-fired generators. Equipment could also include large water heaters and boilers. **For all**

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existing and proposed combustion equipment, provide the sizing such as Btu rating or horsepower, fuel type, manufacturer specifications, the anticipated hours of fuel usage, and anticipated amount of fuel usage.

The County of Santa Barbara Cannabis Land Use Ordinance prohibits the use of generators for cultivation and manufacturing, except for temporary use in the event of a power outage or emergency.<sup>1</sup> "Emergency Use" is defined in Section §93115.4 of the Airborne Toxic Control Measure for Stationary Compression Ignition Engines.<sup>2</sup> **Please note that the use of a diesel-fired generator during periods when a solar power system is not providing sufficient power does not meet the ATCM definition of "Emergency Use."**

3. We understand that the County is requiring a trip generation study. 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.).
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.

APCD staff has the following initial advisories on the project:

1. **CEQA Requirements/Environmental Analysis:** If the proposed project involves the installation and operation of equipment that would require an air district permit (e.g., for a boiler, engines for power generation, engines for water pumping, et cetera), then the APCD would be acting as a Responsible Agency under the California Environmental Quality Act (CEQA) and would rely on the project's environmental analysis when evaluating any APCD permits for proposed equipment. However, the project description does not contain enough information for APCD staff to determine whether this project will require any APCD permits and thus, whether the APCD is a Responsible Agency for this project.

If an APCD permit is required for any project equipment or operations, the project's environmental analysis should include the air pollutant emissions for all proposed equipment and activities to avoid additional CEQA documentation requirements related to APCD permit issuance.

2. **Odor abatement:** This project has the potential to cause odor impacts because of the nature of the operation. Even though an Odor Abatement Plan is not required, the applicant should still design the project to minimize the potential for odor generation and public nuisance complaints through controls or abatement techniques.
3. **New Source Review:** If an APCD permit is required for any project equipment or operations, the APCD will evaluate the emissions from the project to determine whether any New Source Review requirements will apply.

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<sup>1</sup> <http://cannabis.countyofsb.org/asset.c/69>

<sup>2</sup> [www.arb.ca.gov/diesel/documents/FinalReg2011.pdf](http://www.arb.ca.gov/diesel/documents/FinalReg2011.pdf)



4. **Health Risk:** If an APCD permit is required for any project equipment or operations and the project has the potential to emit toxic or hazardous air pollutants, as part of APCD permit issuance, the project may be required to prepare a Health Risk Assessment to determine the potential level of risk associated with proposed operations.
5. **Permit Timing:** The APCD permit process can take several months. If an APCD permit is required for the project, the applicant is encouraged to submit their Authority to Construct permit application to the APCD as soon as possible, see [www.ourair.org/permit-applications/](http://www.ourair.org/permit-applications/) to download the necessary permit application(s).

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

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](mailto:WaddingtonE@sbcapcd.org).

Sincerely,



Emily Waddington  
Air Quality Specialist  
Planning Division

cc: Cal Coast Compliance  
Planning Chron File