



**Santa Barbara County  
Air Pollution Control District**

Our Vision  Clean Air

March 15, 2019

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

**Re: APCD Revised Incompleteness Items for Cardenas Cannabis Cultivation, 18CUP-00000-00030**

Dear Melanie Jackson:

The Air Pollution Control District (APCD) has reviewed the referenced project, which consists of the conversion of agricultural land from food crops to cannabis cultivation. This project requires no excavation or grading. Access to the property is along a compact road base. No pavement of roads is proposed. The project site is served by an existing water well with no additional wells proposed. The subject property, a 19.28-acre parcel zoned AG-II and identified in the Assessor Parcel Map Book as APN 129-020-070, is located at 2660 Morning Hill Road in the unincorporated Santa Maria Area.

**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. It appears that aspects of the proposed operation may be subject to APCD permit requirements. Please compile the information necessary to address the items below, and contact APCD Engineering Division to determine applicable permitting requirements. Contact information: David Harris, Engineering Division Supervisor, (805) 961-8824, [HarrisD@sbcapcd.org](mailto:HarrisD@sbcapcd.org).
  - a. Please describe any existing or proposed combustion equipment that will be installed and/or operated onsite to support the proposed project. This could include large water heaters, boilers, and engines to supply power to equipment, water well drilling, facilities, or operations (such as power to structures, water pumps, electric power generators). Please note that 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. **For all 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.**
2. 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 APCD has a procedure in place for handling

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confidential information for cases where the chemical makeup of odor control products is proprietary information. The APCD procedure for handling confidential information can be found here: [www.ourair.org/wp-content/uploads/6100-020-1.pdf](http://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: <https://www.arb.ca.gov/toxics/healthval/healthval.htm> and <https://www.arb.ca.gov/toxics/healthval/contable.pdf>).
4. Please provide a description of what growing method would be applied to the cannabis cultivation - outdoor (within or without hoop structures), mixed light (greenhouse, glasshouse, conservatory, hothouse, or other similar structure) or indoor (using artificial light). How many acres of cannabis will be cultivated all-together and for each growing method?
5. Please state whether any processing or manufacturing of cannabis is proposed onsite, and if so, describe in detail the processes, equipment, and the end-product. Please also describe the structures onsite in which the processing or manufacturing would take place.
6. Please describe the electrical infrastructure on the property. Include a description of how power will be supplied to meet the electrical needs of all of the existing and proposed land uses and structures that are described in response to questions 1 and 2 above.
7. An air quality and greenhouse gas analysis should be prepared for the project. The analysis should quantify emissions of all air pollutants from all potential emission sources associated with the proposed project, including but not limited to, emissions from mobile sources (vehicle exhaust and fugitive dust from vehicle travel on unpaved roads), permitted and unpermitted combustion equipment, indirect greenhouse gas emissions from electricity use, water use, waste disposal, etc. The air quality and greenhouse gas impact analysis for mobile source emissions should be based on project-specific information and supported by a traffic study whenever possible.
8. A traffic study should be prepared for the proposed project. The trip generation rates detailed in the traffic study, including average daily trips (ADT), should be used to estimate project-specific vehicle emissions.
9. It is our understanding that an Odor Abatement Plan is required for this project. Please provide an Odor Abatement Plan that describes how the project will comply with the requirements of the County's Cannabis Regulations, Section C.6. Include a detailed description of any proposed odor controls or techniques for abatement of odors.

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.

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. 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.
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.
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).

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 [erw@sbcapcd.org](mailto:erw@sbcapcd.org).

Sincerely,



Emily Waddington,  
Air Quality Specialist  
Planning Division

cc: Pedro Cardenas  
David Harris, Supervisor, APCD Engineering Division  
Michael Goldman, Manager, APCD Engineering Division  
Planning Chron File