



**Santa Barbara County
Air Pollution Control District**

March 15, 2019

Nereyda Harmon
Santa Barbara County
Planning and Development
624 W. Foster Road
Santa Maria, CA 93455

Re: APCD Revised Incompleteness Items on Purisima Agriculture, Inc. – Cannabis, 18CUP-00000-00039

Dear Nereyda Harmon:

The Air Pollution Control District (APCD) has reviewed the referenced project, which consists of 183,560 square feet (SF) of outdoor cannabis cultivation and 5,760 SF of cannabis cultivation in existing “greenhouse-style agricultural structures.” Ancillary uses and structures include drying, processing, storage, and a secure waste area inside an existing paddock area and barn. The site will be served by an existing water well. No excavation is required. An Odor Abatement Plan is required for this project and is currently being developed. The subject property, a 20.26-acre parcel zoned AG-I and identified in the Assessor Parcel Map Book as APN 099-330-007, is located at 3131 Avena St. in the unincorporated area of Lompoc.

At the County’s Subdivision Development Review Committee on January 10, 2019, a representative from the project stated that there will be no cannabis manufacturing onsite. There is no proposed or existing combustion equipment onsite and power for the project will be served by PG&E. They expect to have between two to 12 employees.

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.

Please provide responses to the following items:

1. 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 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.
2. 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>).

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3. 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.
5. 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.

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: Jay Higgins
David Harris, Supervisor, APCD Engineering Division
Michael Goldman, Manager, APCD Engineering Division
Planning Chron File