



**Santa Barbara County  
Air Pollution Control District**

Our Vision  Clean Air

March 15, 2019

Monica Esparza  
Santa Barbara County  
Planning and Development  
123 E. Anapamu Street  
Santa Barbara, CA 93101

**Re: Revised APCD Incompleteness Items on SLO Cultivation Inc. – Cannabis, 19CDH-00000-00031**

Dear Ms. Esparza:

The Air Pollution Control District (APCD) has reviewed the referenced project, which consists of the conversion of four existing greenhouses totaling approximately 389,900 square feet (SF) for cannabis cultivation and processing, the development of a 9,900 SF parking area and the utilization of 12 existing containers for various cannabis and material storage. The number of onsite employees at full-scale operation is estimated to be 75 employees and it is estimated that during a typical day the project would generate 108 daily trips. The project includes approximately 100 cubic yards of cut and fill. The project site is served by existing municipal and private water wells and electrical infrastructure. The subject property, totaling 13.66-acres, zoned AG-I-10, and identified in the Assessor Parcel Map Book as APN 005-310-024, is located at 3889 Foothill Road in the unincorporated area of Carpinteria.

**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 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.
2. 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.
3. For any proposed vapor phase odor control systems, please provide all chemical constituents contained in all 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](http://www.ourair.org/wp-content/uploads/6100-020-1.pdf).

4. A health risk assessment should be performed if the 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>).

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) 961-8873 or via email at [HoD@sbcapcd.org](mailto:HoD@sbcapcd.org).

Sincerely,

*Revised APCD Incompleteness Items on SLO Cultivation Inc. – Cannabis, 19CDH-00000-00031*

*March 15, 2019*

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A handwritten signature in black ink, appearing to read "Desmond Ho". The signature is fluid and cursive, with the first name "Desmond" being more prominent than the last name "Ho".

Desmond Ho  
Air Quality Specialist  
Planning Division

cc: Nathaniel J. Eady, SCS Engineers – Agent  
David Harris, Supervisor, APCD Engineering Division  
Michael Goldman, Manager, APCD Engineering Division  
Planning Chron File