



**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 Incompleteness Items on Lion Eye Farms LLC – Mixed-light Cannabis Cultivation, 19DVP-00000-00018

Dear Melanie Jackson:

The Air Pollution Control District (APCD) has reviewed the referenced project, which consists of the validation of approximately 56 existing greenhouses and construction of eight additional greenhouses for mixed-light cannabis cultivation of approximately 2.3 acres. A 225-square foot workshop structure would be demolished. The project would require 18 full-time employees. Under the County Cannabis Land Use Ordinance, an Odor Abatement Plan is not required for this project. No grading is proposed and power is provided by Southern California Edison. The subject property, two parcels totaling 44.72-acres, zoned AG-II-100, and identified in the Assessor Parcel Map Book as APNs 099-210-060 and 099-210-069, are located at 7261 Domingos Road in the unincorporated area of Lompoc.

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.

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.
 - a. Please provide a description of all existing and proposed combustion equipment that will be installed and/or operated onsite to support the proposed project. This could include large water heaters and boilers and engines to supply power to equipment, 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.**

- b. Please state whether any cannabis manufacturing (volatile or non-volatile) will be taking place onsite. For any proposed cannabis manufacturing please describe in detail the processes, equipment, and end-product.
2. 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.).
3. 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.
4. Does the project propose the drilling of a new water well?

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, certain odor control equipment, engines for power generation or 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.
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/ to download the necessary permit application(s).

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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: Stacey Wooten
David Harris, Supervisor, APCD Engineering Division
Michael Goldman, Manager, APCD Engineering Division
Planning Chron File