

April 1, 2021

Gwen Beyeler
Santa Barbara County
Planning and Development
624 W. Foster Road
Santa Maria, CA 93455

Re: Santa Barbara County Air Pollution Control District Incompleteness Items for Cardenas Cannabis Cultivation, 18CUP-00000-00030

Dear Gwen Beyeler:

The Santa Barbara County Air Pollution Control District (District) has reviewed the referenced project, which consists of 14.28-acres of outdoor cannabis cultivation, 4.02 acres of which will be grown under hoop structures. Mature plants will be harvested and packaged for shipment by a mobile freeze-drying unit brought onto the project site during harvesting periods. The project does not involve cannabis manufacturing. Several unpermitted agricultural accessory structures are to be removed from the site. An existing on-site generator will be removed. The proposed cannabis operation will involve a maximum of eight year-round, full time employees, and a maximum of seven additional employees during harvest. Employees will get to the site via carpool and/or vanpool. The project will include nine parking spaces unpaved near the cultivation area. No grading is required and the site will be served by an existing water well. The property is a 19.28-acre parcel zoned AG-II and identified in the Assessor Parcel Map Book as APN 129-020-070, and is located at 2660 Morning Hill Road in the unincorporated area of Santa Maria.

The District 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 District 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 District permit requirements. Please compile the information necessary to address the items below, and contact the District Engineering Division to determine applicable permitting requirements. Contact information: William Sarraf, Engineering Division Supervisor, (805) 961-8888, SarrafW@sbcapcd.org.
 - a. Please describe the mobile freeze-drying unit, the existing onsite generator, and any other 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, facilities, or operations (such as power to structures, water pumps, electric power generators). **For all existing and proposed combustion equipment, provide the sizing such as Btu rating or horsepower, fuel type, anticipated hours of fuel usage and amount of fuel usage, and manufacturer specifications.**

2. 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.
3. 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 District has a procedure in place for handling confidential information for cases where the chemical makeup of odor control products is proprietary information. The District procedure for handling confidential information can be found here: www.ourair.org/wp-content/uploads/6100-020-1.pdf.
4. 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: www.arb.ca.gov/toxics/healthval/healthval.htm and www.arb.ca.gov/toxics/healthval/contable.pdf).
5. 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.
6. 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.).

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

District 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 District 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 District permits for proposed equipment. However, the project description does not contain enough information for District staff to determine whether this project will require any District permits and thus, whether the District is a Responsible Agency for this project.

If a District 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 District permit issuance.

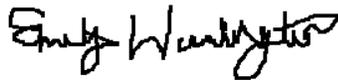
2. **Odor abatement:** This project has the potential to cause odor impacts because of the nature of the operation. The applicant should design the project to minimize the potential for odor

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 a District permit is required for any project equipment or operations, the District will evaluate the emissions from the project to determine whether any New Source Review requirements will apply.
4. **Health Risk:** If a District 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 District 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 District permit process can take several months. If a District permit is required for the project, the applicant is encouraged to submit their Authority to Construct permit application to the District as soon as possible, see www.ourair.org/cannabis/ 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 WaddingtonE@sbcapcd.org.

Sincerely,



Emily Waddington
Air Quality Specialist
Planning Division

cc: David Harris, Manager, District Engineering Division [email only]
William Sarraf, Supervisor, District Engineering Division [email only]
Planning Chron File