

June 22, 2021

Alia Vosburg  
Santa Barbara County  
Planning and Development  
624 W. Foster Road  
Santa Maria, CA 93455

**Re: Santa Barbara County Air Pollution Control District Revised Incompleteness Items for Fusion Development Company LLC. – Cannabis Cultivation, 19CUP-00000-00017**

Dear Alia Vosburg:

The Santa Barbara County Air Pollution Control District (District) has reviewed the referenced project, which consists of the cultivation of approximately 1.47 acres of outdoor cannabis cultivation under hoop structures and processing activities (drying and trimming) within a proposed 1,000 square foot processing building equipped with a carbon filtration system. Processing activities do not involve freezing of cannabis. The operation would involve three harvests per year for a duration of approximately one week per harvest, requiring six full-time employees and additional seasonal employees. The project will receive electricity from the grid and a 190-foot solar array is proposed. Generators are not proposed. Existing onsite groundwater wells will serve the site. Several existing unpermitted structures will be removed. A single-family residence will remain onsite and is not a part of the cannabis operation. Grading will include 150 cubic yards of cut. The subject property, a 200-acre parcel zoned AG-II-100 and identified in the Assessor Parcel Map Book as APN 131-070-045, is located at 600 Pine Canyon 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 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 including the proposed carbon filtration system.
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 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](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: [www.arb.ca.gov/toxics/healthval/healthval.htm](http://www.arb.ca.gov/toxics/healthval/healthval.htm) and [www.arb.ca.gov/toxics/healthval/contable.pdf](http://www.arb.ca.gov/toxics/healthval/contable.pdf)).
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. 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.).

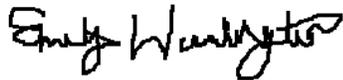
Once the necessary information is provided and reviewed for completeness, the District will submit a departmental condition letter for the project. Please ensure that all applicable District conditions are included with the Conditions of Approval for the project.

District staff has the following initial advisories on the project:

1. Based on the project description and information that has been provided, the project does not require a District permit. However, if the project description changes, the applicant should refer to the District's cannabis permitting webpage at [www.ourair.org/cannabis/](http://www.ourair.org/cannabis/) to determine if any equipment or operations will require District permits.
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.

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](mailto: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