



**air pollution control district**  
SANTA BARBARA COUNTY

July 25, 2019

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

**Re: Air Pollution Control District Incompleteness Items for Santa Maria Highland Farms LLC –  
Outdoor & Mixed-Light Cannabis Cultivation, 19CUP-00000-00032**

Dear Gwen Beyeler:

The Air Pollution Control District (District) has reviewed the referenced project, which consists of approximately 0.31 acres of outdoor cannabis cultivation in hoop houses and approximately 0.11 acres of mixed-light cannabis and nursery cultivation in a proposed 5,000 square foot (SF) greenhouse. Processing activities (drying, trimming, and storage) would occur in an existing 500 SF garage structure. The project is expected to employ four people. The site is served by an existing well and no grading is proposed. The subject property, a 40.03-acre parcel zoned AG-I-40 and identified in the Assessor Parcel Map Book as APN 131-180-011, is located at 3425 Tepusquet Road in the unincorporated Santa Maria area.

**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. 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 onsite. If renewable energy sources are proposed, please provide the expected energy output of the units.
2. 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: David Harris, Engineering Division Supervisor, (805) 961-8824, [HarrisD@sbcapcd.org](mailto:HarrisD@sbcapcd.org).
  - a. Please describe any 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, water well drilling, 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

Aeron Arlin Genet, Air Pollution Control Officer

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, and manufacturer specifications.**

- b. Please state whether any cannabis manufacturing (volatile and/or non-volatile) will be taking place onsite. For any proposed cannabis processing (including drying and packaging) and any cannabis manufacturing please describe in detail the processes, equipment, and end-product.
3. 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.
4. 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).
5. A health risk assessment should be performed if a proposed vapor phase odor control system utilizes a chemical listed on the *Consolidated Table of OEHH/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>).
6. 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.
7. 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 APCD 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/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) 961-8878 or via email at [WaddingtonE@sbcapcd.org](mailto:WaddingtonE@sbcapcd.org).

Sincerely,



Emily Waddington  
Air Quality Specialist  
Planning Division

cc: Jacob Pickering  
David Harris, Supervisor, District Engineering Division [email only]  
Michael Goldman, Manager, District Engineering Division [email only]  
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