

August 2, 2021

Alia Vosburg
Santa Barbara County
Planning and Development
123 E. Anapamu Street
Santa Barbara, CA 93101

Re: Santa Barbara County Air Pollution Control District Incompleteness Items on Heritage Enterprises – Mixed-Light Cannabis Cultivation, 21CDH-00000-00020

Dear Alia Vosburg:

The Santa Barbara County Air Pollution Control District (District) has reviewed the referenced project, which consists of allowing cannabis cultivation within an existing 141,400 square foot greenhouse. The greenhouse will undergo normal maintenance and repair, but no structural alterations or improvements are proposed. Nine existing unpermitted structures around the perimeter will be demolished along with an existing unpermitted dwelling. No grading is proposed and the parcel is served by municipal water and power. An odor abatement plan was provided and proposes the use of carbon scrubbing systems and a Byers vapor phase system with Ecosorb CNB 107. The subject property, a 5-acre parcel zoned AG-I-5 and identified in the Assessor Parcel Map Book as APN 065-250-031, is located at 1385 S. Anderson Lane in the unincorporated areas of Goleta.

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 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 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, anticipated hours of fuel usage and amount of fuel usage, 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.
2. Please provide a description of the equipment (if any) that will be used to freeze and store cannabis onsite, including if the equipment is stationary, portable, and/or contained within the footprint of an existing or proposed structure. In addition, specify how power will be supplied to the proposed equipment and, if portable, how long the equipment will be located onsite.
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.

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/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) 961-8873 or via email at HoD@sbcapcd.org.

Sincerely,

Desmond Ho

Desmond Ho
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