

August 3, 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 Baby Duck LLC Cannabis Cultivation, 19CUP-00000-00010, 19DVP-00000-00019

Dear Gwen Beyeler:

The Santa Barbara County Air Pollution Control District (District) has reviewed the referenced project, which consists of 32.61 acres of cannabis cultivation and processing including 6.99 acres of indoor nursery cultivation, 18.43 acres of cultivation in greenhouses, and 7.19 acres of outdoor cultivation in hoop structures. New development includes a 15,000 square foot (SF) nursery and processing building with freezers, a 2,000 SF storage building, a shed for pesticide storage, a security office, and four storage containers. Cannabis will be stored onsite in freezers until it is transported offsite for further processing. An existing onsite well will provide water and the site will be connected to grid electricity. The subject property, a 480.23-acre parcel zoned AG-II-320 and identified in the Assessor Parcel Map Book as APN 101-100-035, is located at 8300 Cat Canyon Road in the community of Los Alamos.

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 any **existing** combustion equipment that is currently operating onsite. This could include large water heaters, boilers, and engines to supply power to equipment, facilities, or operations. **For all existing combustion equipment, provide the sizing such as Btu rating or horsepower, fuel type, anticipated hours of usage, amount of fuel used, and manufacturer specifications.**
2. Please describe any **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. 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 proposed combustion equipment, provide the sizing such as Btu rating or horsepower, fuel type, anticipated hours of usage, amount of fuel used, and manufacturer specifications. In addition, please specify how the equipment will be used in support of the proposed project.**

3. Please confirm that the project does not involve onsite manufacturing (volatile and/or nonvolatile) operations.
4. Provide a description of the equipment 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.
5. Is the project proposing to use transportation refrigeration units (TRUs) to store product onsite? If so, please provide the approximate number of TRUs operating onsite on a daily and annual basis, their fuel type, and the approximate number of hours that diesel TRU engines would be operating on a daily and annual basis.
6. 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.
7. 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.
8. 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).
9. 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.
10. 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, 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.

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