



**air pollution control district**  
SANTA BARBARA COUNTY

September 6, 2019

Stephen Peterson  
Santa Barbara County  
Planning and Development  
624 W. Foster Road  
Santa Maria, CA 93455

**Re: Air Pollution Control District Incompleteness Items for Cuyama Farms LLC – Outdoor & Mixed-Light Cannabis Cultivation, 19CUP-00000-00041**

Dear Stephen Peterson:

The Air Pollution Control District (District) has reviewed the referenced project, which consists of approximately 30 acres of outdoor cannabis cultivation in hoop structures and 10,000 square feet (SF) of mixed-light nursery cannabis cultivation in a proposed greenhouse. Two 120 SF prefabricated storage structures and a 160 SF security structure would be added to the site. An existing 5,400 SF barn, 900 SF produce stand, and 120 SF outhouse would be demolished. All processing activities including drying, trimming, and packaging would occur offsite. No manufacturing is proposed. No grading is required and water will be provided by an existing water well. The operation would require approximately 10 full-time employees and an additional 10 to 20 seasonal employees. Operations would occur seven days a week from 6:00 am to 3:00 pm. The subject property, a 118.75-acre parcel zoned AG-II and identified in the Assessor Parcel Map Book as APN 149-230-010, is located at 3700 Highway 33 in the unincorporated community of New Cuyama.

**The District finds the application to be incomplete and requires more information about the proposed project to determine potential air quality impacts.**

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.
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*

Aeron Arlin Genet, Air Pollution Control Officer

*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, delivery 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 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: Stacey Wooten, Cal Coast Compliance  
David Harris, Supervisor, District Engineering Division [email only]  
Michael Goldman, Manager, District Engineering Division [email only]  
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