



**Santa Barbara County
Air Pollution Control District**

Our Vision  Clean Air

October 29, 2018

Brianna Wiley
Santa Barbara County
Planning and Development
624 W. Foster Road
Santa Maria, CA 93455

**Re: APCD Incompleteness Items for Herbal Angels Cannabis Operation,
18CUP-00000-00032, 18DP-00000-00009**

Dear Ms. Wiley:

The Air Pollution Control District (APCD) has reviewed the referenced project, which consists of cannabis cultivation, storage, manufacturing (volatile and non-volatile), packaging, and distribution. Cannabis cultivation includes 15-acres of outdoor cultivation with use of hoop houses, five acres of mixed-light cultivation in greenhouses, and one acre of mixed-light nursery cultivation in greenhouses. Additionally, this project includes erecting two accessory buildings and four agricultural employee dwellings (one triplex and one single residential unit). Accessory Building A would consist of 12,000 square feet of packaging, distribution, and manufacturing (volatile and non-volatile). Accessory Building B would consist of 20,000 square feet for storing, drying, and freezing cannabis, as well as for storage of agricultural equipment. An existing agricultural storage shed would be demolished. The project includes the use of "generators" to provide power in the case of outages or emergencies. A one-acre solar array is proposed for onsite sourced power. The number of onsite employees at full-scale operation is estimated to be 60 people including 40 seasonal employees. During a typical day the project would generate 44 daily trips which would increase to 124 daily trips during the peak season. This project requires 21 acres of grading work including 70,000 cubic yards of cut and 70,000 cubic yards of fill. Volatile manufacturing processes include the use of butane and other hydrocarbon solvents. No new water wells are proposed. The subject property, a 102.1-acre parcel zoned AG-II and identified in the Assessor Parcel Map Book as APN 099-090-006, is located at 2761 Cebada Canyon Road in the unincorporated Lompoc area.

APCD 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 APCD 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 expand on the provided Odor Abatement Plan to include:
 - a. A floor plan, specifying locations of odor-emitting activity(ies) and emissions.
 - b. A description of the specific odor-emitting activity(ies) that will occur.
 - c. A description of the phases (e.g., frequency and length of each phase) of odor-emitting activity(ies).

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- d. A description of all equipment and methods to be used for reducing odors, including details of any specific building designs to neutralize or capture odors. Provide design drawings and technical brochures and/or vendor data for the odor control system(s) and building designs.
2. Please provide the capacity of the solvent vessel(s) in gallons, the types of solvents that will be used, and the amount of makeup solvent expected to be purchased each year due to solvent fugitive losses from the cannabis manufacturing equipment and operations.
3. Please describe the existing and proposed electrical infrastructure on the property. Include a description of how power will be supplied to meet the electrical needs of all the existing and proposed land uses and structures on the property. Please include the expected energy output of the proposed solar array and how this will affect the overall electrical demand of the proposed project.
4. The Operations Manual proposes the use of “generators”. Please provide a description of all existing and proposed combustion equipment that will be installed and/or operated onsite to support the proposed project, including the “generators”. Equipment could also 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). **For all existing and proposed combustion equipment, provide the sizing such as Btu rating or horsepower, fuel type, manufacturer specifications, the anticipated hours of fuel usage, and anticipated amount of fuel usage.**

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.¹ “Emergency Use” is defined in Section §93115.4 of the Airborne Toxic Control Measure for Stationary Compression Ignition Engines.² Please note that the use of a diesel-fired generator during periods when a solar power system is not providing sufficient power does not meet the ATCM definition of “Emergency Use.”

5. An air quality and greenhouse gas analysis should be prepared for the project. The analysis should quantify emissions of all air pollutants from all potential emission sources associated with the proposed project, including but not limited to, emissions from mobile sources (vehicle exhaust and fugitive dust from vehicle travel on unpaved roads), permitted and unpermitted combustion equipment, indirect greenhouse gas emissions from electricity use, water use, waste disposal, etc. The air quality and greenhouse gas impact analysis for mobile source emissions should be based on project-specific information and supported by a traffic study whenever possible.
6. A traffic study should be prepared for the proposed project. The trip generation rates detailed in the traffic study, including average daily trips (ADT), should be used to estimate project-specific vehicle emissions.

¹ <http://cannabis.countyofsb.org/asset.c/69>

² www.arb.ca.gov/diesel/documents/FinalReg2011.pdf

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

APCD staff has the following initial advisories on the project:

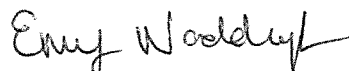
1. **CEQA Requirements/Environmental Analysis:** If the proposed project involves the installation and operation of equipment that would require an air district permit (e.g., for a boiler, engines for power generation, engines for water pumping, et cetera), then the APCD would be acting as a Responsible Agency under the California Environmental Quality Act (CEQA) and would rely on the project's environmental analysis when evaluating any APCD permits for proposed equipment. However, the project description does not contain enough information for APCD staff to determine whether this project will require any APCD permits and thus, whether the APCD is a Responsible Agency for this project.

If an APCD 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 APCD 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 an APCD 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 an APCD 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 APCD 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 APCD permit process can take several months. If an APCD permit is required for the project, the applicant is encouraged to submit their Authority to Construct permit application to the APCD as soon as possible, see 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 erw@sbcapcd.org.

Sincerely,



Emily Waddington,
Air Quality Specialist

Planning Division

cc: Zoe Carlson, Dudek
Dave Harris, Engineering Division Supervisor
Planning Chron File