



**Santa Barbara County
Air Pollution Control District**

November 13, 2018

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

**Re: APCD Incompleteness Items on Jonata Park Growers – Cannabis Cultivation,
18DVP-00000-00010**

Dear Ms. Wiley:

The Air Pollution Control District (APCD) has reviewed the referenced project, which consists of the proposed cultivation of cannabis including 0.93 acres of outdoor cultivation with hoop structures and 0.59 acres of nursery (10 mixed light greenhouses). Ancillary structures include a 320 square foot (SF) pesticide and nutrient container, a 160 SF waste dumpster, and a 1,100 SF barn for processing, drying, and trimming cannabis. The site will be served by an existing water well. No excavation is required. An Odor Abatement Plan is not required or proposed for this project. The subject property, a 158-acre parcel zoned AG-II and identified in the Assessor Parcel Map Book as APN 099-640-003, is located at 2051 Jonata Park Road in the unincorporated area of Buellton.

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 state whether any manufacturing of cannabis is proposed onsite, and if so, describe in detail the processes, equipment, and the end-product. Please also describe the structures onsite in which the manufacturing would take place.
2. 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.
3. 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, manufacturer specifications, the anticipated hours of fuel usage, and anticipated amount of fuel usage.

4. 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.
5. 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.

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. Although an Odor Abatement Plan is not required for this project, the applicant should design the project to minimize the potential for odor generation and public nuisance complaints through controls or abatement techniques.
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

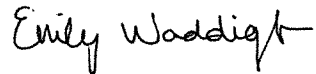
November 13, 2018

Page 3

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: Jay Higgins
Planning Chron File