



**Santa Barbara County
Air Pollution Control District**

Our Vision  Clean Air

December 19, 2018

Kimberley McCarthy
Santa Barbara County
Planning and Development
624 W. Foster Road
Santa Maria, CA 93455

Re: APCD Incompleteness Items on Lily's Green Garden – Cannabis, 18DVP-00000-00012

Dear Ms. McCarthy:

The Air Pollution Control District (APCD) has reviewed the referenced project, which consists of the conversion of two existing greenhouses totaling 162,000 square feet (SF) and hoop structures for cannabis cultivation. Two existing accessory structures on the property would also be used for cannabis cultivation and processing: a 1,820 SF storage warehouse, and a 2,640 SF barn to be used for trimming and production. The project includes no grading and an existing water well would serve the site. An Odor Abatement Plan is not required or proposed. The subject property, totaling 59.47-acres, zoned AG-II-40, and identified in the Assessor Parcel Map Book as APNs 117-020-074 and 117-020-075, is located at 2425 Bonita School Road in the unincorporated area of Santa Maria.

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 provide a description of the greenhouses and hoop structures that would be used for cannabis cultivation. How many acres (or square-feet) of cannabis will be cultivated all-together and for each growing method?
2. Please state whether manufacturing of cannabis is proposed onsite. For the processing that will be taking place onsite as well as any manufacturing, please describe in detail the processes, equipment, and the end-product. Please also describe the structures onsite in which the processing and manufacturing would take place.
3. Please include a detailed description of any proposed odor controls or techniques for abatement of odors.
4. 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 that are described in response to questions 1 and 2 above.
5. 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,

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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, and manufacturer specifications.

6. 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.
7. 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 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 waddingtone@sbcapcd.org.

Sincerely,



Emily Waddington
Air Quality Specialist
Planning Division

cc: Dave Cross, Fletcher-Cross & Associates
Planning Chron File