

June 29, 2020

Ciara Ristig
Santa Barbara County
Planning and Development
123 E. Anapamu Street
Santa Barbara, CA 93101

Re: Santa Barbara County Air Pollution Control District Incompleteness Items for Givens Outdoor Cannabis Cultivation, 20CUP-00000-00001

Dear Ciara Ristig:

The Santa Barbara County Air Pollution Control District (District) has reviewed the referenced project, which consists of cannabis cultivation including 3.55 acres of cultivation in hoop structures, 1,340 square feet (SF) of shipping containers for storage and equipment, a 10kW solar power system, and a portable backup generator. The project also proposes non-cannabis agricultural food crop improvements including 5.04 acres of hoop structures and 310 SF of shipping containers. Several existing permitted non-cannabis structures will remain onsite. No new water wells are required, and no cannabis manufacturing is proposed. The subject property, a 94.19-acre parcel zoned AG-II-100 and identified in the Assessor Parcel Map Book as APN 083-180-013, is located at 9491 Santa Rosa Road in the unincorporated area of Buellton.

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 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 existing and proposed land uses and structures on the property. Please include the how the expected energy output of the proposed solar array will affect the overall electrical demand of the proposed project.
2. Please describe the proposed portable backup generator as well as any other 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). **For all equipment, including the proposed portable backup generator, please provide the sizing such as horsepower, fuel type, anticipated hours of fuel usage and amount of fuel usage, and manufacturer specification sheet.**

3. 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.
4. 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.
5. 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).
6. Please specify the amount of grading (cut and fill) that the project requires.
7. 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.
8. 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:

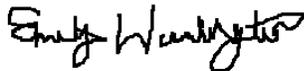
1. **CEQA Requirements/Environmental Analysis:** If the proposed project involves the installation and operation of equipment that would require an air district permit (e.g., for a boiler, engines for power generation, engines for water pumping, et cetera), then the District would be acting as a Responsible 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. **Proposed Generator:** 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. "Emergency Use" is defined in Section §93115.4 of the Airborne Toxic Control Measure for Stationary Compression Ignition Engines (see: www.arb.ca.gov/diesel/documents/FinalReg2011.pdf). **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."**
3. **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.
4. **New Source Review:** If a District permit is required for any project equipment or operations, the District will evaluate the emissions from the project to determine whether any New Source Review requirements will apply.
5. **Health Risk:** If a District 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 District permit issuance, the project may be required to prepare a Health Risk Assessment to determine the potential level of risk associated with proposed operations.
6. **Permit Timing:** The District permit process can take several months. If a District permit is required for the project, the applicant is encouraged to submit their Authority to Construct permit application to the District as soon as possible, see www.ourair.org/cannabis/ 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: David Harris, Manager, District Engineering Division [email only]
William Sarraf, Supervisor, District Engineering Division [email only]
Planning Chron File