

REDACTED

From: **Carly V. Barham** <BarhamC@sbcapcd.org>

Date: Thu, Nov 10, 2022 at 3:52 PM

Subject: RE: ATC 15634 - Notification of Contractor Support

To: Lindsay Cokeley <lindsay@ccagriculture.com>, David I. Harris <HarrisD@sbcapcd.org>

Cc: andriana@ccagriculture.com <andriana@ccagriculture.com>, Alex Economou <EconomouA@sbcapcd.org>, William S. Sarraf <SarrafW@sbcapcd.org>, Matthew Allen <matthew@ccagriculture.com>, Jenna Richardson <jrichardson@countyofsb.org>

Hi Lindsay,

I apologize for the delay in responding to your questions below. I've been out of the office due to illness. I have provided responses to your questions below.

1. *What is the District considering to be existing versus proposed for our permit? It's our understanding that the ATC 15634 includes the existing operation plus BACT for our solvent use, and all operations are considered existing.*

A: The proposed project is the permitting of a cannabis manufacturing and distribution facility including all equipment and controls that will be listed on your permit (this may include any existing equipment/operations at your facility as well as any proposed equipment/operations

that you would like permitted by the District as part of ATC 15634). See response to question 2 below for information on how we may define existing conditions.

2. *After speaking with Carly last week, I was under the impression that a MND may not be required depending on the baseline that is established. How will the baseline be determined?*

A: Baseline for a project undergoing CEQA review is normally the existing conditions at the project site at the time environmental analysis begins. In this case, we will likely consider baseline to be the existing setting at the time the application was deemed complete (August 2022).

That being said, the existing setting (including existing usage, activities, and emissions) must be supported by substantial evidence. Therefore, as part of our review and environmental analysis, we will gather all available evidence to support your existing activities and emissions. You have already provided some data to sufficiently establish a baseline for some emissions sources, such as electricity usage. As we discussed on our most recent call, the District will need more substantiation for solvent usage to establish an emissions baseline for this source. There may be other emissions sources that require additional support. With assistance from the environmental consultant (MRS), the District and CCA can work through additional data and/or information needs.

As you pointed out on our call, your existing manufacturing operations do not have BACT installed. Therefore, if we can substantiate a solvent usage baseline, it is likely, at least with respect to solvent emissions, that your existing project results in greater emissions than your proposed project that will have the benefit of controls.

If there are emissions sources and activities that sufficient data is not available or cannot be obtained, we may use a baseline of zero for those aspects of the analysis. In this case, essentially the impact of your proposed project would be the total emissions from the completed project.

Our determination that an MND is required is based on the information we had to date at the time we deemed the application complete. Therefore, as we discussed, additional data on existing setting could change the scope and magnitude of potential impacts of the project and could result in a reduced scope of environmental review.

3. *If it turns out that a MND is not required, will the consultant make that determination, or will it be a collaborative effort with CCA involved?*

A: The District determines the CEQA requirements for projects for which a District permit is required. We will work with CCA to ensure that we have accurate project information and obtain your input on the analysis and process. We will also consult with CCA regarding any measures that could be incorporated into the project to sufficiently lessen impacts such that the project could qualify for a reduced scope of environmental review. In these early stages, the

environmental consultant will assist us with identifying data and information needs to properly evaluate the impacts from your project.

Please let me know if you have any questions or want to discuss.

Sincerely,
Carly



Carly Barham

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From: Lindsay Cokeley <lindsay@ccagriculture.com>
Sent: Tuesday, November 1, 2022 4:55 PM
To: David I. Harris <HarrisD@sbcapcd.org>; Carly V. Barham <BarhamC@sbcapcd.org>
Cc: andriana@ccagriculture.com; Alex Economou <EconomouA@sbcapcd.org>; William S. Sarraf <[SarrafW@sbcapcd.org](mailto:SarraffW@sbcapcd.org)>; Matthew Allen <matthew@ccagriculture.com>
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Hello David and Carly,

We are ready to move forward with MRS Environmental as the consultant and we do not have any alternative proposals. As far as the scope is concerned, can you please answer the below questions?

The proposal from MRS Environmental states that our facility is requesting a permit for an expansion of existing operations. What is the District considering to be existing versus proposed for our permit? It's our understanding that the ATC 15634 includes the existing operation plus BACT for our solvent use, and all operations are considered existing.

After speaking with Carly last week, I was under the impression that a MND may not be required depending on the baseline that is established. How will the baseline be determined? If it turns out that a MND is not required, will the consultant make that determination, or will it be a collaborative effort with CCA involved?

Thank you,

Lindsay Cokeley

Director, Compliance | CCA

I am currently out of the office for family leave on Mondays, Wednesday after 2pm and Friday after 12pm.

On Fri, Oct 21, 2022 at 1:14 PM Maria Sales <SalesM@sbcapcd.org> wrote:

Dear Andriana Villalpando:

Attached is a copy of the Authority to Construct Application 15634 – Notification of Contractor Support.

Should you have any questions, please contact David Harris at (805) 979-8311 or at HarrisD@sbcapcd.org.

Sincerely,



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