

**de la Guerra, Sheila**

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**From:** Adam Poll <apoll@dudek.com>  
**Sent:** Monday, December 13, 2021 3:14 PM  
**To:** Williams, Das; Hart, Gregg; Hartmann, Joan; Nelson, Bob; Lavagnino, Steve  
**Cc:** Vosburg, Alia; Dargel, Joseph; Ramirez, Angelica; sbcob; Richardson, Jennifer; me@courtneyetaylor.com; Guillen, Christopher R.  
**Subject:** Canna Rios Greenwaste Emissions Assessment for Tomorrow's Hearing  
**Attachments:** Greenwaste Letter 12.13.2021.pdf



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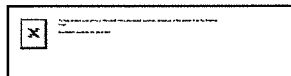
Dear County Supervisors,

On behalf of Canna Rios, attached please find my Greenwaste Emissions Assessment.

Sincerely,

**Adam Poll, QEP, LEED AP BD+C**

Senior Environmental Specialist



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December 13, 2021

13971

Brandon Gesicki  
Canna Rios, LLC  
PO Box 22347  
Carmel, CA 93922

**Subject: Greenwaste Emissions Assessment for the Canna Rios, LLC Cannabis Cultivation Project**

Dudek has prepared a greenwaste emissions assessment for the Canna Rios, LLC (applicant) Cannabis Cultivation Project (project) in Santa Barbara County, California. The total cannabis cultivation area (non-nursery) will be approximately 46.29 acres in size. According to the applicant, the approximately 16% of the total weight of the cannabis plant is considered waste (pruning waste (fan leaves), root ball, and stalk) and will be either tilled directly into the soil or dried (in compost area), chipped, and tilled into the soil. During each harvest (2 harvests per year) the waste not tilled directly into the soil will be stockpiled for drying up to 90 days and then processed back into the soil. The greenwaste from the harvests would not be composted using traditional hot composting methods or other methods described in Marianne Strange's December 3, 2021 Memorandum. The air emissions from the stockpiling of the greenwaste are estimated below.

The following assumptions regarding the operation of the project were provided by the applicant who has grown cannabis on this project site, and are assumed for estimating the air emissions from the greenwaste onsite: 1,500 plants per acre; 46.29 acres; average of 4.5 pounds per plant; 16% waste per plant by weight; and up to 90 day stockpiling per harvest. The California Air Resources Board's recommended emission factor for volatile organic compound (VOC) emissions for greenwaste stockpiles found in Composting Facilities (not applicable to farms) are 0.2 pounds per wet ton per day<sup>1</sup>. Even if this emission factor were to apply to onsite farming operations, this would only result in 45,674 pounds of greenwaste per harvest (22.84 tons). Assuming 90 days of stockpiling all of this material per harvest (as opposed to practice of direct tilling some of the plant waste), this would result in a conservative-estimate of 822 pounds (0.41 tons) of VOCs per year and 4.57 pounds of VOC per day. Therefore, the VOC emissions from greenwaste processing (if this project were considered a Composting Facility, which it is not) would not exceed the Santa Barbara County Air Pollution Control District's (SBCAPCD) thresholds for Best Achievable Control Technology (BACT) or offsets and would not be subject to a SBCAPCD operational permit.

Sincerely,

Adam Poll, QEP, LEED AP BD+C  
Senior Air Quality Specialist

cc: Amy Steinfeld, Brownstein Hyatt Farber Schreck, LLP

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<sup>1</sup> [https://ww3.arb.ca.gov/ei/areasrc/composting\\_emissions\\_inventory\\_methodology\\_final\\_combined.pdf](https://ww3.arb.ca.gov/ei/areasrc/composting_emissions_inventory_methodology_final_combined.pdf)