

Brianda Negrete

From: Morgan Krapes <mkrapes@flowersassoc.com>
Sent: Friday, December 9, 2022 11:48 AM
To: sbcob
Cc: Dargel, Joseph; Singer, Ben; Gelare Macon; Seawards, Travis; Lia Graham
Subject: RE: December 13, 2022 Board of Supervisors Meeting Information - Ceres Farms Mixed-Light Cannabis Cultivation Appeal
Attachments: Ceres Farm BOS Letter_Appeal Amendment_20221209.pdf

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Good Morning,

Please see the attached letter to be presented to the Board for the 12/13 Board of Supervisors meeting, Agenda Item No. 3.

Thank you,



Morgan Krapes-Kiah
Public Agency Coordinator
 115 West Canon Perdido Street
 Santa Barbara, CA 93101
www.flowersassoc.com
 805.966.2224 Ext. 100

Begin forwarded message:

From: Lia Graham <ligraham@countyofsb.org>
Date: December 8, 2022 at 9:21:20 AM PST
To: "Seawards, Travis" <tseawards@countyofsb.org>, "Singer, Ben" <bsinger@countyofsb.org>, Gelare Macon <gmacon@flowersassoc.com>, "Wilson, Jeffrey" <jewilson@countyofsb.org>, "Plowman, Lisa" <lplowman@countyofsb.org>
Subject: December 13, 2022 Board of Supervisors Meeting Information - Ceres Farms Mixed-Light Cannabis Cultivation Appeal

Good Morning,

Please see the attached Agenda for the December 13th Santa Barbara County Board of Supervisors meeting. The *Ceres Farms Mixed-Light Cannabis Cultivation Appeal* is scheduled as Departmental Item No. 3 (see page 29 of the attached Agenda) and is estimated to have a start time between approximately **1:30 - 2:00 PM**. The total time allocations allotted to both parties is also attached to this email.

Lastly, as a friendly reminder, any documents received after noon on Friday, December 9th will need to be voted into the record and if either of the parties require a presentation that the Clerk of

the Board has not yet received, we ask that you kindly send that no later than noon on Monday, December 12th to: sbcob@countyofsb.org.

Please feel free to let me know if you have any questions.

Sincerely,

Lia Marie Graham
Deputy Clerk of the Board of Supervisors
County of Santa Barbara
105 E. Anapamu Street, Suite 407, Santa Barbara, CA 93101
t: 805.568.2247 f: 805.568.2249
ligraham@countyofsb.org

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December 9, 2022

Santa Barbara County Board of Supervisors
105 East Anapamu Street
Santa Barbara, CA 93101

Re: Ceres Farm, LLC
6030 Casitas Pass Road, Carpinteria, CA
22APL-000000-00028, 19CDP-00000-00015

Honorable Supervisors:

This office represents Ceres Farm, LLC, the applicant and appellant for the subject project. Per the Planning Commission Action Letter of September 2nd, the Commission added a condition requiring the applicant to install odor scrubbers/filters as the primary means of odor control technology, such as the Regenerative Carbon Scrubbing System or equivalent, within 12 months of permit approval. We are formally amending our appeal and requesting an update to the project description and revision to the Planning Commission added condition.

Our revision to the Project Description is requested as follows:

“1. Proj Des-01 Project Description: This Coastal Development Permit is based upon and limited to compliance with the project description and all conditions of approval set forth below, including mitigation measures and specified plans and agreements included by reference, as well as all applicable County rules and regulations. The project description is as follows:

The Proposed Project is a request for a Coastal Development Permit to allow for approximately 9.5 acres of cannabis cultivation consisting of 7.86 acres of mature plant cultivation and 1.43 acres of nursery cultivation within existing, permitted greenhouses and approximately 0.21 acres of cultivation (processing and storage) within an existing, permitted storage and processing structure. Up to 15% of cannabis processed will be grown offsite. There will be no more than one import and export per day associated with offsite cannabis. The processing structure will also include office space, non-cannabis storage, and restrooms for employees.

The project also consists of removing an unpermitted mobile home and demolishing the following structures:

- 822-square-foot addition to the pump house;
- 2,139-square-foot cooler structure;
- 260-square-foot accessory structure; and
- 50-square-foot accessory structure.

An existing single-family dwelling will remain on-site and will not be utilized as a part of the cannabis operations. No tree removal, vegetation removal, or grading is proposed. Odor abatement will consist of Benzaco Scientific vapor-phase systems surrounding all cultivation and

processing areas, as well as carbon filters within processing areas. The applicant will install carbon scrubbers, such as the Regenerative Carbon Scrubbing System (RCSS) or equivalent internal greenhouse scrubbers/filters, as primary means of odor control technology no later than 24 months of Coastal Development Permit issuance. The operation will be fenced off by a six-foot high chain-link fence, part of which is existing. Additional avocado trees will be planted to provide screening. Lighting will consist of motion-sensing, fully shielded, and downward directed lights mounted on existing structures. Access will be provided by an existing 26-foot wide driveway, which will connect to a new all-weather fire road throughout the parcel. Water service will be provided by an existing private well on-site and potable water will be provided by the Carpinteria Valley Water District. There is an existing on-site water well that was approved under Case No. 90-CDP-162 with a condition restricting the well from serving any property other than the subject property, APN 001-030-023. With the approval of this permit, that condition will be revoked and the existing, on-site well may serve other properties subject to approval by County Environmental Health Services. The cultivation will use a closed-loop irrigation system to conserve water.

2. Proj Des-01 Project Description: The operation will utilize 66 employees, including managerial staff. Fifty-two parking spaces will be provided onsite. Carpool parking, bicycle parking, and a shuttle service will be provided to reduce traffic impacts. Employees will be incentivized with monthly monetary benefits to minimize vehicle trips. The Facilities Manager will monitor the trip generation and alternative transportation use, including carpooling and shuttles, and will store and make available alternative transportation records every year. The hours of operation will be 6:00 am – 5:30 pm every day of the week. Ceres Farm, LLC has agreed to observe a set of Community Odor Guidelines that were developed through collaboration between Cannabis Association for Responsible Producers (CARP Growers) and The Coalition for Responsible Cannabis (Coalition). These Guidelines are not part of the Project Description and not enforceable by the County, but reflect a collaborative effort to ensure that cannabis cultivation can be a sustainable element of Carpinteria’s unique community, and are a foundation of the Coalition’s decision to support this Project. The property is a 16.77-acre parcel zoned AG-I within the Carpinteria Agricultural Overlay, shown as APN 001-030-023 and addressed as 6030 Casitas Pass Road, Carpinteria, First Supervisorial District.

Any deviations from the project description, exhibits or conditions must be reviewed and approved by the County for conformity with this approval. Deviations may require approved changes to the permit and/or further environmental review. Deviations without the above described approval will constitute a violation of permit approval.”

Our revision to the added Condition is requested as follows:

“37. Odor Abatement Plan Revision. Prior to issuance of the Coastal Development Permit, the applicant shall submit an updated Odor Abatement Plan that incorporates the following language:

Given the research and development state of ventilated greenhouse scrubbers, the Applicant commits to utilizing internal greenhouse odor scrubbers/filters such as the Regenerative Carbon Scrubbing System (RCSS) or equivalent internal greenhouse scrubbers/filters as the means of primary odor control technology no later than ~~twelve (12)~~ twenty-four (24) months from ~~project approval~~ Coastal Development Permit issuance. Consequently, upon installation and testing of

the internal scrubber/filtration system, the facility operator shall also reduce or eliminate the use of vapor-phase neutralizing systems to the maximum extent feasible based upon the ability to prevent fugitive odors from reaching residentially zoned receptors.

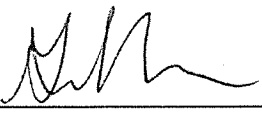
The deployment of the RCSS odor control technology, or equivalent internal scrubbing system, would require the grid-like distribution of the scrubbers throughout the interior of the cultivation greenhouse. The specific number of scrubbers will be determined by a Professional Engineer or Certified Industrial Hygienist, consistent with Article II Section 35-144U. Additionally, the ratio of scrubbers per acre will be highly variable based on facility specific design parameters including greenhouse volume, CFM rating for the scrubbers, baseline odor concentration, etc. Therefore, the Project specific design details will be based on final site specific engineering.

PLAN REQUIREMENTS AND TIMING: ~~P&D shall approve the updated Odor Abatement Plan prior to issuance of Coastal Development Permit.~~ Applicant shall submit grid-like distribution of the odor control technology to P&D within six (6) months after issuance of Coastal Development Permit.

MONITORING: P&D compliance staff will inspect the Project site to confirm the odor control system is constructed pursuant to the requirements of this condition and the updated Odor Abatement Plan for the life of the permit.”

We kindly ask that you grant our requested amendment to the appeal and approve the project, Case No. 19CDP-00000-00015, taking into consideration the revisions to the project description and added condition as stated above.

Respectfully,
FLOWERS & ASSOCIATES, INC.

By: 
Gelare Macon, AICP
Agent for Applicant