

Time Extension Request – Odor Abatement Technology Implementation (VCF / March 18, 2026 Deadline)

On behalf of Valley Crest Farms, we respectfully submit this Time Extension Request pursuant to SB County Code §35.42.075.C.6 / §35-144U.C.7 (Odor Abatement Plans) for a one-time extension of up to twelve (12) months to the March 18, 2026 deadline requiring odor abatement technology to be installed and operational. This request is based on supply chain delays as contemplated by the ordinance, supported by vendor documentation demonstrating that key odor-control equipment must be manufactured and cannot be delivered/installed by the current deadline despite timely procurement.

1) Project Background and Compliance Objective

Valley Crest Farms is actively working to comply with the amended County odor abatement requirements, including preparation of an updated, P.E.-certified Odor Abatement Plan (OAP) and procurement of odor abatement equipment designed to prevent cannabis odor from exceeding 4 D/T for a continuous three-minute period at the property line, consistent with the Coastal Zoning Ordinance. Our objective remains to implement a compliant, durable odor-control system as quickly as practicable, and to document installation, continuous operation, run-time metering, maintenance, and field verification in accordance with County requirements.

2) Basis for Extension Request – Supply Chain Delays (§35.42.075.C.6(a))

VCF has taken timely steps to procure compliant odor-control equipment and initiate engineering design and documentation. However, the selected equipment manufacturer has confirmed that the units must be fabricated to order and that production is not expected to be completed until approximately the end of January 2026, followed by shipment and installation activities. Given the remaining time needed for delivery logistics, installation, electrical integration (including run-time metering), commissioning, and field verification, VCF may not be able to reasonably complete full installation and commissioning by March 18, 2026 due to circumstances outside of its control.

Supporting documentation is attached, including (at minimum):

- Purchase/order documentation and proof of order date;
- Manufacturer correspondence confirming fabrication lead times and expected production completion; and
- Order acknowledgment reflecting production and anticipated ship window.
- Correspondence showing Yorke Engineering abandoning the OAP draft without notice, Precision Engineering working with Genesis Air Systems and VCF to complete by 12/18, including a site-visit.

3) Requested Extension Duration

VCF requests a one-time extension of twelve (12) months from the March 18, 2026 implementation deadline. If the County prefers a shorter duration, VCF is willing to accept an extension period that reflects the manufacturer's confirmed lead time plus reasonable installation/commissioning and verification timelines.

4) Interim Measures and Commitment to Compliance

During the extension period, VCF will continue to implement interim odor-control and operational measures while moving forward in good faith toward installation of the required equipment. These measures include:

- Continued operation and maintenance of existing odor-control practices and equipment currently in use;
- Prompt installation and commissioning of the new system immediately upon receipt of equipment;
- Implementation of run-time metering and maintenance logs consistent with the ordinance; and
- Completion of field verification testing and corrective actions as needed to achieve compliance with the 4 D/T property-line standard.



December 17, 2025

To Whom It May Concern:

Genesis Air Inc has received an order to manufacture 45 air scrubbers for Valley Crest Farms located at 5980 Casitas Pass Road, Carpinteria, CA. These units are currently in production queue internally as well as with our external component manufacturers. Lead time for production is currently 6 weeks. Currently the estimated completion date of this project to ship is January 30, 2026.

A handwritten signature in blue ink, appearing to read "Josh Long", is written over a faint, illegible stamp or watermark.

Josh Long
President
Genesis Air, Inc.

Sales order: ORD901616

Created: 2025-12-17

Customer:
Valley Crest Farms

Delivery deadline:
2026-01-30

Bill to:

Ship to:
Valley Crest Farms

Item	Quantity	Price per unit	Discount	Total price	Tax
1 [B2 B&W Vein] B2 / B&W Vein	45 pcs		0.00%		
2 [Sales/Miscellaneous] Sales/Miscellaneous	45 pcs		0.00%		
3 [Shipping] Shipping	1 pcs		0.00%		
4 [Sales/Miscellaneous] Sales/Miscellaneous	1 pcs		0.00%		
Total (with tax):					

Shipping fee

Description	Cost	Tax
	0.00 USD	No tax
Total shipping fee (with tax):		0.00 USD

Total units:	92 pcs
Subtotal:	
Shipping fee:	
Plus tax:	
Total:	

Notes.

qty 45 - 2008 B2 hammered white
qty 45 - step down transformers

Wednesday, December 17, 2025 at 2:39:54 PM Pacific Standard Time

Subject: Re: [EXTERNAL] Re: VCF Greenhouse - Growing Area Designation Confirmation (25-316.000.0)
Date: Thursday, December 11, 2025 at 9:28:24 AM Pacific Standard Time
From: Chris Howard
To: Lindsey Laubach, Benjamin Warner
CC: Lisette Cendejas
Attachments: Screenshot 2025-12-11 at 7.12.47 AM.png, image001.png, inky-injection-inliner-03755809cc10337ec572b1f12a6beedf.png, inky-injection-inliner-209b06d63f3139b7bbda7129634c80da.png, inky-injection-inliner-6f42d488d348cfd86bff9497caf9f6a.png, inky-injection-inliner-e0c5e04ec3692c9149434d474b0acb15.png



External (choward@precisioneng.net)



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Lindsey: Thank you for the pics and operational explanation - that makes sense.

Regards - Chris Howard (559-298-0000)

From: Lindsey Laubach <llaubach@greenbrierhldgs.com>
Sent: Thursday, December 11, 2025 9:12:32 AM
To: Benjamin Warner; Chris Howard
Cc: Lisette Cendejas
Subject: Re: [EXTERNAL] Re: VCF Greenhouse - Growing Area Designation Confirmation (25-316.000.0)



Caution: External (llaubach@greenbrierhldgs.com)
First-Time Sender



Hi Chris,

We have 10 ridge vents per greenhouse. I have attached a couple of photos. The vents open automatically to control the humidity level in the greenhouses.

Thank you,
Lindsey

From: Benjamin Warner <benjamin@greenbrierhldgs.com>
Sent: Thursday, December 11, 2025 8:02 AM
To: Chris Howard <choward@precisioneng.net>; Lindsey Laubach <llaubach@greenbrierhldgs.com>
Cc: Lisette Cendejas <lcendejas@precisioneng.net>
Subject: Re: [EXTERNAL] Re: VCF Greenhouse - Growing Area Designation Confirmation (25-316.000.0)

Hi Chris,

Not as familiar with ridge vent locations or functionality?

Lindsey, can you help us with this one, please?

Thank you,
Benjamin

From: Chris Howard <choward@precisioneng.net>
Date: Thursday, December 11, 2025 at 8:00 AM
To: Benjamin Warner <benjamin@greenbrierhdgs.com>
Cc: Lindsey Laubach <llaubach@greenbrierhdgs.com>, Lisette Cendejas <lcendejas@precisioneng.net>
Subject: Re: [EXTERNAL] Re: VCF Greenhouse - Growing Area Designation Confirmation (25-316.000.0)

Benjamin: Than you.

One more questions - Can you locate the **location** of the ridge vent? Is there more than one crossing the complex from Area 1 to 4?

During my visit, I noted the one, but didn't verify it was the only one.

Also - Can the ridge vent opening be adjusted or is it fixed?

Thanks - Chris Howard (559-298-0000)

From: Benjamin Warner <benjamin@greenbrierhdgs.com>
Sent: Thursday, December 11, 2025 7:23 AM
To: Chris Howard
Cc: Lindsey Laubach
Subject: [EXTERNAL] Re: VCF Greenhouse - Growing Area Designation Confirmation (25-316.000.0)

Good morning, Chris.

Per our conversation last night:



Area #1 is designated for immature plants (not flowering), and Areas #2-4 are designated for mature plants (flowering).

The 10,000 square foot area highlighted in Yellow is the area where mature plants are allowed to grow if we chose to cultivate them in Area #1.

Thank you,
Benjamin

--
Benjamin Warner
Compliance Department
m: (240) 644-5203



From: Chris Howard <choward@precisioneng.net>
Date: Wednesday, December 10, 2025 at 2:46 PM
To: Benjamin Warner <benjamin@greenbrierhldgs.com>
Cc: Lindsey Laubach <llaubach@greenbrierhldgs.com>
Subject: VCF Greenhouse - Growing Area Designation Confirmation (25-316.000.0)

Benjamin: Please mark-up the attached drawing showing what areas of the greenhouse would be allocated to nursery, vegetative plants, and flowering plants based on the table below.

The mark up can be approximate.

My understanding was that Areas 4 &3 accommodate flowering plants, Area 2 accommodates vegetative plants, and a portion of Area 1 is for nursery (immature) plants. There is a 10,000 SF space in the upper right hand corner of Area 1, that I'm not sure what it is used for. Can we assume nursery? Area 1 was not open during my visit so I'm not sure of the configuration and layout.

Call if you have any questions.

Total Greenhouse Space (sqft)	Nursery Plants (sqft)	Vegetative Plants (sqft)	Flowering Plants (sqft)	Processing Activities (sqft)
335,848 sq. ft. total (325, 360 sq. ft. planted)	81,340	81,340	162,680	35,200 (1) 8,700 (2)

Regards - Chris Howard (559-298-0000)

Wednesday, December 17, 2025 at 2:37:14 PM Pacific Standard Time

Subject: Re: VCF - OAP Development, Additional Information Request (PCE P# 25-316.000.0)
Date: Wednesday, December 10, 2025 at 12:58:50 PM Pacific Standard Time
From: Benjamin Warner
To: Chris Howard, dgrant@puravidaairstystems.com
CC: josh.long@genesissair.com, brandon.hawkins@genesissair.com
Attachments: inky-injection-inliner-6f42d488d348cfdc86bff9497caf9f6a.png, inky-injection-inliner-e0c5e04ec3692c9149434d474b0acb15.png

Hi Chris,

Yorke never made on-site to collect data (an additional upcharge); all we have is the nasal ranger data provided previously that was collected by VCF staff at the property line and within/throughout the operation.

Benjamin

Benjamin Warner
Compliance Department
m: (240) 644-5203



From: Chris Howard <choward@precisioneng.net>
Sent: Wednesday, December 10, 2025 12:45 PM
To: dgrant@puravidaairstystems.com <dgrant@puravidaairstystems.com>; Benjamin Warner <benjamin@greenbrierhldgs.com>
Cc: josh.long@genesissair.com <josh.long@genesissair.com>; brandon.hawkins@genesissair.com <brandon.hawkins@genesissair.com>
Subject: VCF - OAP Development, Additional Information Request (PCE P# 25-316.000.0)



External (choward@precisioneng.net)



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Gentlemen: I could use your help. At your earliest convenience please send me the information described in the attached email excerpts. See **bold red** and **partially highlighted headers**. I'm working on having a draft OAP report to VCF by COB Friday.

Call if you have any questions.

Regards - Chris Howard (559-298-0000)

10/28/2025 - Odor Unit Data Collected by Yorke; VCF please provide, if available

From: Benjamin Warner <benjamin@greenbrierhdgs.com>
Sent: Wednesday, October 29, 2025 9:01 AM
To: Greg Wolffe <gwolffe@yorkeengr.com>; Philip Fagundes <pfagundes@fagundesdairy.com>; Sean Gildea <sgildea@yorkeengr.com>; R. R. Grant <dgrant@puravidaairstystems.com>
Cc: Josh Long <josh.long@genesissair.com>; Brandon Hawkins <brandon.hawkins@genesissair.com>; Dan Briggs <dbriggs@genesissair.com>; James Adams <jadams@yorkeengr.com>
Subject: Re: Latest test results
Good morning, Greg.

At the point, I agree that it's best if a Yorke representative comes on-site early next week for OU samples. Please confirm a date and time ASAP; I will plan to be on-site as well.

In the meantime, I'll work on a CFM estimate to the best of my abilities.

Thank you,
Benjamin

Benjamin Warner
Compliance Department
m: (240) 644-5203

10/21/2025 - Yorke Draft or Final Unit / Acre Assessment using Genesis Equipment. Confirm it was based on the Condor Verde 2008 PCO Equipment; VCF or Genesis please provide if available.

Note: Dick, in a previous phone visit you mentioned you had the Yorke Calcs / analysis for the number of units per acre for the Genesis offering, not sure if that offering was the Condor Verde 2008 B2. If not, what unit was it based on.

From: Sean Gildea <sgildea@yorkeengr.com>
Date: Tuesday, October 21, 2025 at 7:57 PM
To: Benjamin Warner <benjamin@greenbrierhdgs.com>, R. R. Grant <dgrant@puravidaairstystems.com>, Greg Wolffe <gwolffe@yorkeengr.com>
Cc: Philip Fagundes <pfagundes@fagundesdairy.com>, Josh Long <josh.long@genesissair.com>, Brandon Hawkins <brandon.hawkins@genesissair.com>, Dan Briggs <dbriggs@genesissair.com>
Subject: RE: Latest test results
Hi Benjamin & Team,

We completed a draft of our assessment and calculations for units per acre, however preliminary results were not as low as we were expecting; we're doing another round of review of our assumptions and calculations and we'll provide an update tomorrow morning as soon as we can.

Thanks,

**Sean Gildea, MSEnvE, PE, CPP | San Juan Capistrano Office
Senior Engineer**

O: (949) 248-8490 | M: (949) 201-0605

SGildea@YorkeEngr.com | [V-card Link](#)

Yorke Engineering, LLC | Corporate Office

31726 Rancho Viejo Road, Suite 218, San Juan Capistrano, CA 92675

Phone: (949) 248-8490

10/8/2025 - Test Results?; Genesis Please provide results / data.

From: R. R. Grant <dgrant@puravidaairstystems.com>

Date: Wednesday, October 8, 2025 at 12:26 PM

To: Sean Gildea <sgildea@yorkeengr.com>, Greg Wolffe <gwolffe@yorkeengr.com>, Benjamin Warner <benjamin@greenbrierhdgs.com>, Philip Fagundes <pfagundes@fagundesdairy.com>, Josh Long <josh.long@genesisaair.com>, Brandon Hawkins <brandon.hawkins@genesisaair.com>, Dan Briggs <dbriggs@genesisaair.com>

Subject: Re: Latest test results

Here is the test we discussed.

**R. R. (Dick) Grant, P.E.(Inactive)
207 Devine Street
San Antonio, Texas 78210**

Subject: Re: VCF - Odor Control Units Update and Options to Move Forward
Date: Monday, November 17, 2025 at 9:45:25 AM Pacific Standard Time
From: Benjamin Warner
To: Sean Gildea, Greg Wolffe
CC: Philip Fagundes
Attachments: image001.jpg, image002.png, image003.png, image004.png, image005.png, image006.png

Thanks, Sean.

Regarding the odor readings: the third-party collection was done using a St. Croix Nasal Ranger with cannabis-specific cartridges. Each sample consisted of three consecutive D/T readings at each location, taken facing away from direct plumes, approximately 5 ft above ground level, and logged with corresponding door/vent status, and activity (e.g., trimming).

Of course, these are field olfactometry observations only, not panel-based odor analyses, and were intended to provide a site-specific operational baseline to help inform your modeling, not to serve as lab-certified odor panel results. If you need a formalized written sampling method statement, I can prepare that.

Benjamin

From: Sean Gildea <sgildea@yorkeengr.com>
Date: Monday, November 17, 2025 at 9:30 AM
To: Benjamin Warner <benjamin@greenbrierhldgs.com>, Greg Wolffe <gwolffe@yorkeengr.com>
Cc: Philip Fagundes <pfagundes@fagundesdairy.com>
Subject: RE: VCF - Odor Control Units Update and Options to Move Forward

Hi Benjamin, thanks for sharing- we're reviewing and discussing. In the meantime, can you share the method of how these samples were collected and analyzed?

For reference, using our ambient odor unit methodology from before with the Envinity units comes out to a total of 35 units required, 31 for the greenhouse and 4 for the processing building. See attached for the calculations. This is assuming a flow rate of 3,000 m³/hr (1,766 cfm) for the Envinity CFS-3000 units, and a control efficiency of 95% based on an SCS report from 2022 (for the OAP, we would need a statement from Envinity confirming this is the expected control efficiency).

Thank you,

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**Sean Gildea, MSEnvE, PE, CPP | San Juan Capistrano Office
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From: Benjamin Warner <benjamin@greenbrierhdgs.com>
Sent: Monday, November 17, 2025 7:47 AM
To: Sean Gildea <sgildea@yorkeengr.com>; Greg Wolffe <gwolffe@yorkeengr.com>
Cc: Philip Fagundes <pfagundes@fagundesdairy.com>
Subject: Re: VCF - Odor Control Units Update and Options to Move Forward

EXTERNAL EMAIL: This email originated from outside YorkeEngr.com. Please use caution.

Good morning, Sean.

As follows, please find data collected over the last week from within the operation:

Location	Day 1 (11/7 – measured D/T)	Day 2	Day 3	Day 4	Day 5	Day 6	Day 7
Greenhouse 1 – Vents middle	2	2	2	2	2	2	2
Greenhouse 1 – Back door open	2	2	2	2	2	2	2
Greenhouse 2 – Spraying in progress	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Greenhouse 3 – Middle inside	4	4	4	4	4	4	4
Greenhouse 3 – Inside middle (second reading)	15	15	15	15	15	15	15
Greenhouse 3 – Front door closed	4	4	4	4	4	4	4
Greenhouse 3 – Vents middle	7	7	7	7	7	7	7
Greenhouse 3 – Front door open	7	7	7	7	7	7	7
Greenhouse 3 – Back door open	4	4	4	4	4	4	4
Greenhouse 4 – Front door closed	2	2	2	2	2	2	2
Greenhouse 4 – Inside middle	7	7	7	7	7	7	7
Greenhouse 4 – Vents middle	7	7	7	7	7	7	7
Greenhouse 4 – Front door open	7	7	7	7	7	7	7
Greenhouse 4 – Back door open	4	4	4	4	4	4	4
Greenhouse 4 – Vents by door (more mature flower)	15	15	15	15	15	15	15
Processing – Side roll-up door open	7	7	7	7	7	7	7
Processing – Side roll-up door closed	4	4	4	4	4	4	4
Processing – Bucking area	30	30	30	30	30	30	30

Processing – Flower room	15	15	15	15	15	15	15
Processing – Door trimming room	30	30	30	30	30	30	30
Processing – Dry room 1	60	60	60	60	60	60	60
Processing – Dry room 7–8	60	60	60	60	60	60	60
Processing – Dry room 6	60	60	60	60	60	60	60
Processing – Front roll-up closed	4	4	4	4	4	4	4
Processing – Front roll-up opened	15	15	15	15	15	15	15

We captured one full sampling session performed by a third-party; the 7-day table treats those readings as a representative ‘steady-state’ week for modeling purposes. If you’d prefer, we can instead use Day 1 only and treat it as a conservative baseline.

Considering these additional data points, when can we anticipate reviewing updated figures using Envinity or Genesis scrubbers?

Thank you,
Benjamin

--
Benjamin Warner
Compliance Department
m: (240) 644-5203



From: Benjamin Warner <benjamin@greenbrierhldgs.com>
Date: Friday, November 14, 2025 at 10:49 AM
To: Sean Gildea <sgildea@yorkeengr.com>, Greg Wolffe <gwolffe@yorkeengr.com>
Cc: Philip Fagundes <pfagundes@fagundesdairy.com>
Subject: Re: VCF - Odor Control Units Update and Options to Move Forward

Good morning, Sean.

What is a realistic ETA for updated figures using Envinity scrubbers?

We are still collecting nasal ranger O/U data from throughout the operation.

Thank you,
Benjamin

Benjamin Warner
Compliance Department
m: (240) 644-5203

From: Benjamin Warner <benjamin@greenbrierhdgs.com>
Sent: Tuesday, November 11, 2025 9:34:39 AM
To: Sean Gildea <sgildea@yorkeengr.com>; Greg Wolffe <gwolffe@yorkeengr.com>
Cc: Philip Fagundes <pfagundes@fagundesdairy.com>
Subject: Re: VCF - Odor Control Units Update and Options to Move Forward

Sean,

Yes — please assume the CFS-3000 units for now, as that’s the model we’re evaluating. If you need specs beyond the nominal CFM and pressure data from Envinity’s datasheet, let me know and I’ll confirm or provide them directly from the vendor.

Benjamin

Benjamin Warner
Compliance Department
m: (240) 644-5203

From: Sean Gildea <sgildea@yorkeengr.com>
Sent: Tuesday, November 11, 2025 8:34:33 AM
To: Benjamin Warner <benjamin@greenbrierhdgs.com>; Greg Wolffe <gwolffe@yorkeengr.com>
Cc: Philip Fagundes <pfagundes@fagundesdairy.com>
Subject: RE: VCF - Odor Control Units Update and Options to Move Forward

Hi Benjamin, we’ll run the numbers.

Can you confirm if Envinity is proposing the CFS-3000 units, or if there is another model you are looking at?

We have usable information right now to estimate the amount of units, but may need Envinity to confirm some information before we finalize.

Thank you,

Yorke Service Areas Include: Air Quality, Storm Water, Hazardous Waste, Industrial Hygiene-Safety, and CEQA Technical Reports. For a more detailed list: www.YorkeEngr.com/Services.

Sean Gildea, MSEnvE, PE, CPP | San Juan Capistrano Office
Senior Engineer

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From: Benjamin Warner <benjamin@greenbrierhldgs.com>
Sent: Tuesday, November 11, 2025 7:53 AM
To: Sean Gildea <sgildea@yorkeengr.com>; Greg Wolffe <gwolffe@yorkeengr.com>
Cc: Philip Fagundes <pfagundes@fagundesdairy.com>
Subject: Re: VCF - Odor Control Units Update and Options to Move Forward

EXTERNAL EMAIL: This email originated from outside YorkeEngr.com. Please use caution.

Good morning, Sean.

Please re-run the odor modeling and unit-count estimate assuming **Envinity** air scrubbers in place of Genesis. Our understanding is that Envinity units have a higher airflow capacity (CFM), which could allow fewer total scrubbers while still meeting the ≤ 4 D/T at the property line requirement.

Please keep all other inputs constant and let us know how the required unit count changes.

Let me know if you need Envinity performance specifications beyond what is publicly available.

Thank you,
Benjamin

--

Benjamin Warner
Compliance Department
m: (240) 644-5203



From: Sean Gildea <sgildea@yorkeengr.com>
Date: Wednesday, November 5, 2025 at 12:40 PM
To: Benjamin Warner <benjamin@greenbrierhldgs.com>
Cc: Philip Fagundes <pfagundes@fagundesdairy.com>, Greg Wolffe <gwolffe@yorkeengr.com>
Subject: RE: VCF - Odor Control Units Update and Options to Move Forward

Understood, we'll follow up towards the end of next week.

Thanks,

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**Sean Gildea, MSEnvE, PE, CPP | San Juan Capistrano Office
Senior Engineer**

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From: Benjamin Warner <benjamin@greenbrierhldgs.com>
Sent: Wednesday, November 5, 2025 11:11 AM
To: Sean Gildea <sgildea@yorkeengr.com>
Cc: Philip Fagundes <pfagundes@fagundesdairy.com>; Greg Wolffe <gwolffe@yorkeengr.com>
Subject: Re: VCF - Odor Control Units Update and Options to Move Forward

EXTERNAL EMAIL: This email originated from outside YorkeEngr.com. Please use caution.

Hi Sean,

Please wait for us to perform sampling; we hope to have data by the end of next week.

The odor reduction percentage noted is duly noted.

Thank you,
Benjamin

--

Benjamin Warner
Compliance Department
m: (240) 644-5203



From: Sean Gildea <sgildea@yorkeengr.com>
Date: Wednesday, November 5, 2025 at 10:47 AM
To: Benjamin Warner <benjamin@greenbrierhldgs.com>

Cc: Philip Fagundes <pfagundes@fagundesdairy.com>, Greg Wolffe <gwolffe@yorkeengr.com>

Subject: RE: VCF - Odor Control Units Update and Options to Move Forward

Hi Benjamin and Philip, just checking in for an update and next steps. Let us know if you have any other questions at this stage.

Thank you,

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Sean Gildea, MSEnvE, PE, CPP | San Juan Capistrano Office

Senior Engineer

O: (949) 248-8490 | M: (949) 201-0605

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From: Sean Gildea

Sent: Monday, November 3, 2025 2:59 PM

To: Benjamin Warner <benjamin@greenbrierhdgs.com>

Cc: Philip Fagundes <pfagundes@fagundesdairy.com>; Greg Wolffe <gwolffe@yorkeengr.com>

Subject: RE: VCF - Odor Control Units Update and Options to Move Forward

Hi Benjamin,

A quick correction to my email below- the total should be 88 units instead of 86, there was a minor change to the processing building calculation. See attached.

We won't be able to reduce to under \$1.5k. Let us know if you'd like us to move forward with the OAP with this amount or if you'd prefer that we wait until any potential sampling that you perform. Note that the ambient odor concentration would need to reduce about 45% from the numbers we're currently using to come out to 8 units per acre, which would be around 65-70 units.

Thanks,

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Sean Gildea, MSEnvE, PE, CPP | San Juan Capistrano Office

Senior Engineer

O: (949) 248-8490 | M: (949) 201-0605

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From: Benjamin Warner <benjamin@greenbrierhldgs.com>
Sent: Monday, November 3, 2025 1:14 PM
To: Sean Gildea <sgildea@yorkeengr.com>
Cc: Philip Fagundes <pfagundes@fagundesdairy.com>; Greg Wolffe <gwolffe@yorkeengr.com>
Subject: Re: VCF - Odor Control Units Update and Options to Move Forward

EXTERNAL EMAIL: This email originated from outside YorkeEngr.com. Please use caution.

Thanks, Sean — if we can do the on-site data collection for \$1500 or less, than yes, we'll take a new proposal and agree to the new scope.

Otherwise, we'll do the sampling ourselves from the specific locations needed.

Please let us know.

Thank you,
Benjamin

Benjamin Warner
Compliance Department
m: (240) 644-5203

From: Sean Gildea <sgildea@yorkeengr.com>
Sent: Monday, November 3, 2025 10:58:51 AM
To: Benjamin Warner <benjamin@greenbrierhldgs.com>
Cc: Philip Fagundes <pfagundes@fagundesdairy.com>; Greg Wolffe <gwolffe@yorkeengr.com>
Subject: VCF - Odor Control Units Update and Options to Move Forward

Hi Benjamin,

Following our call on Friday, we discussed internally and reevaluated the odor strength of the Genesis testing to assume that the 28,284 OU/m³ strength is only representative of areas where odor is being generated (i.e. around flowering plants and processing areas). Based on this assumption, we calculated the *average* odor unit strength in your greenhouse to be around 3,788 OU/m³, and within the processing building to be 7,424 OU/m³. We recalculated the amount of Genesis units to 10 units

per acre for the greenhouse and 13 units per acre for the processing building, for a total of 86 units.

If you would like to reevaluate the odor strength in your greenhouse, we can reduce the cost in the proposal to only evaluate odors inside the greenhouse; this would reduce both the sampling effort and lab analysis costs. The hope would be to get readings less than 3,788 OU/m³, however lower results are not guaranteed. Please let us know if you would like us to update the proposal and provide a new cost estimate.

The other main factor besides ambient odor strength in determining the units per acre is the control efficiency of the units and the flow rate; a higher control efficiency would reduce the amount of passthroughs per hour, and a higher flow rate would reduce the amount of units needed to meet the passthrough rate. If there are other odor control systems in consideration besides the Genesis units that may have a higher control efficiency or flow rate, we can evaluate how that would change the amount of units needed.

Please let us know if you have any questions.

Thank you,

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**Sean Gildea, MSEnvE, PE, CPP | San Juan Capistrano Office
Senior Engineer**

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From: Benjamin Warner <benjamin@greenbrierhldgs.com>
Sent: Friday, October 31, 2025 9:12 AM
To: Greg Wolffe <gwolffe@yorkeengr.com>; Sean Gildea <sgildea@yorkeengr.com>
Cc: Philip Fagundes <pfagundes@fagundesdairy.com>
Subject: Re: VCF - Odor Abatement Plan

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10:30 is fine, thanks.

Benjamin

Benjamin Warner
Compliance Department
m: (240) 644-5203

From: Greg Wolffe <gwolffe@yorkeengr.com>
Sent: Friday, October 31, 2025 9:07:15 AM
To: Benjamin Warner <benjamin@greenbrierhldgs.com>; Sean Gildea <sgildea@yorkeengr.com>
Cc: Philip Fagundes <pfagundes@fagundesdairy.com>
Subject: Re: VCF - Odor Abatement Plan

Adding Sean to the invite.

Thanks.

Greg Wolffe
Yorke Engineering
Cell: 714-315-9049

From: Greg Wolffe <gwolffe@yorkeengr.com>
Sent: Friday, October 31, 2025 8:54:15 AM
To: Benjamin Warner <benjamin@greenbrierhldgs.com>
Cc: Philip Fagundes <pfagundes@fagundesdairy.com>
Subject: Re: VCF - Odor Abatement Plan

Yes, let's talk. How does 10:30 work?

Greg Wolffe
Yorke Engineering
Cell: 714-315-9049

From: Benjamin Warner <benjamin@greenbrierhldgs.com>
Sent: Friday, October 31, 2025 7:51:40 AM
To: Greg Wolffe <gwolffe@yorkeengr.com>
Cc: Philip Fagundes <pfagundes@fagundesdairy.com>
Subject: Re: VCF - Odor Abatement Plan

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Good morning, Greg — removing others from this email.

Before we authorize the amendment, Phil and I would like to have a short discussion with you directly to ensure we're fully aligned on the scope, level of effort, and associated cost. The main concern is that the current pricing feels higher than expected relative to what's needed at this stage. Our focus remains ensuring you have what's necessary to confidently refine the model and certify the minimum compliant configuration for the OAP, without adding more scope or lab work than the County requires.

We'd like to walk through the sampling approach, the lab cost drivers, and possible ways to streamline or phase the work so we stay on track technically and financially.

Do you have 15–20 minutes today for a quick call, just the three of us?

Thank you,
Benjamin

--

Benjamin Warner
Compliance Department
m: (240) 644-5203



From: Greg Wolffe <gwolffe@yorkeengr.com>
Date: Thursday, October 30, 2025 at 6:29 PM
To: Benjamin Warner <benjamin@greenbrierhldgs.com>, Philip Fagundes <pfagundes@fagundesdairy.com>
Cc: Sean Gildea <sgildea@yorkeengr.com>, Sequoia May <smay@yorkeengr.com>, Bipul Saraf <bsaraf@yorkeengr.com>
Subject: Re: VCF - Odor Abatement Plan

Yea Rebecca is in our proposals department.

Greg Wolffe
Yorke Engineering
Cell: 714-315-9049

From: Benjamin Warner <benjamin@greenbrierhldgs.com>
Sent: Thursday, October 30, 2025 6:26:58 PM
To: Greg Wolffe <gwolffe@yorkeengr.com>; Philip Fagundes <pfagundes@fagundesdairy.com>
Cc: Sean Gildea <sgildea@yorkeengr.com>; Sequoia May <smay@yorkeengr.com>; Bipul Saraf <bsaraf@yorkeengr.com>
Subject: Re: VCF - Odor Abatement Plan

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I just received the attached from Rebecca.

Benjamin

From: Greg Wolffe <gwolffe@yorkeengr.com>

Date: Thursday, October 30, 2025 at 6:14 PM

To: Philip Fagundes <pfagundes@fagundesdairy.com>, Benjamin Warner <benjamin@greenbrierhldgs.com>

Cc: Sean Gildea <sgildea@yorkeengr.com>, Sequoia May <smay@yorkeengr.com>, Bipul Saraf <bsaraf@yorkeengr.com>

Subject: Re: VCF - Odor Abatement Plan

All the costs will be broken down. You should be getting it shortly.

Greg Wolffe
Yorke Engineering
Cell: 714-315-9049

From: Philip Fagundes <PFagundes@fagundesdairy.com>

Sent: Thursday, October 30, 2025 5:17:20 PM

To: Benjamin Warner <benjamin@greenbrierhldgs.com>; Greg Wolffe <gwolffe@yorkeengr.com>

Cc: Sean Gildea <sgildea@yorkeengr.com>; Sequoia May <smay@yorkeengr.com>; Bipul Saraf <bsaraf@yorkeengr.com>

Subject: Re: VCF - Odor Abatement Plan

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How much does it cost?

Thank you
Philip Fagundes

From: Benjamin Warner <benjamin@greenbrierhldgs.com>

Sent: Thursday, October 30, 2025 4:53:04 PM

To: Greg Wolffe; Philip Fagundes

Cc: Sean Gildea; Sequoia May; Bipul Saraf

Subject: Re: VCF - Odor Abatement Plan

+ [@Philip Fagundes](#)

From: Greg Wolffe <gwolffe@yorkeengr.com>

Date: Thursday, October 30, 2025 at 4:50 PM

To: Benjamin Warner <benjamin@greenbrierhldgs.com>

Cc: Sean Gildea <sgildea@yorkeengr.com>, Sequoia May <smay@yorkeengr.com>, Bipul Saraf <bsaraf@yorkeengr.com>

Subject: RE: VCF - Odor Abatement Plan

Thanks, Benjamin.

You should get our amendment shortly. The odor panel lab costs ended up being a bit high because we are proposing 4 samples total: 2 in the greenhouse (bloom and flower/harvest), one at the ridge vent, and 1 in the processing building. In addition, Sequoia will use a Nasal

Ranger equipped with cannabis-specific cartridges to take numerous odor observations around the property and fenceline so that we can compare what the odor panel testing shows compared to ambient air odor observations.

We can discuss more if you have questions once we get you the quote, this is just a heads up on what we are proposing.

Thanks,
Greg

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Principal Scientist

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From: Benjamin Warner <benjamin@greenbrierhdgs.com>

Sent: Thursday, October 30, 2025 11:37 AM

To: Greg Wolffe <gwolffe@yorkeengr.com>

Cc: Sean Gildea <sgildea@yorkeengr.com>; Sequoia May <smay@yorkeengr.com>; Bipul Saraf <bsaraf@yorkeengr.com>

Subject: Re: VCF - Odor Abatement Plan

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Thanks, Greg — there should be access to the ridge vents.

Tuesday afternoon is best.

Benjamin

Benjamin Warner
Compliance Department
m: (240) 644-5203

From: Greg Wolffe <gwolffe@yorkeengr.com>
Sent: Thursday, October 30, 2025 11:16:13 AM
To: Benjamin Warner <benjamin@greenbrierhldgs.com>
Cc: Sean Gildea <sgildea@yorkeengr.com>; Sequoia May <smay@yorkeengr.com>; Bipul Saraf <bsaraf@yorkeengr.com>
Subject: RE: VCF - Odor Abatement Plan

Hi Ben, I'm pulling together a short amendment for you to authorize us coming out next week to collect odor samples and conduct odor observations, and we already have the qualified staff lined up for next week. I'm copying Sequoia May, who will be the person conducting the odor data, and Bipul who is coordinating with St. Croix Lab where the odor sample will be analyzed by the panel.

Sequoia will be taking numerous odor readings at the fenceline using a Nasal Ranger. To facilitate our comparative assessment, we would like to collect an odor sample at the ridge vent. Is there any access to the vent so that a sample can be collected, either from the inside (using scaffolding etc.), or as outside access?

Our approach will be to compare actual odor measurements taken at the ridge vent to contemporaneous odor observations at the fenceline and see if that can help us refine the number of units required.

Regarding scheduling, does either next Monday or Tuesday work for you?

Thanks,
Greg

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From: Benjamin Warner <benjamin@greenbrierhldgs.com>
Sent: Thursday, October 30, 2025 10:36 AM
To: Greg Wolffe <gwolffe@yorkeengr.com>; Philip Fagundes <pfagundes@fagundesdairy.com>;

Sean Gildea <sgildea@yorkeengr.com>; R. R. Grant <dgrant@puravidaairstystems.com>
Cc: Josh Long <josh.long@genesisair.com>; Brandon Hawkins
<brandon.hawkins@genesisair.com>; Dan Briggs <dbriggs@genesisair.com>; James Adams
<jadams@yorkeengr.com>
Subject: Re: VCF - Odor Abatement Plan
Importance: High

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Good morning, Dick & Genesis team — what is the current ETA for the purchase quote for X units?

Thank you in advance.

Benjamin

From: Greg Wolffe <gwolffe@yorkeengr.com>
Date: Wednesday, October 29, 2025 at 9:54 AM
To: Benjamin Warner <benjamin@greenbrierhldgs.com>, Philip Fagundes <pfagundes@fagundesdairy.com>, Sean Gildea <sgildea@yorkeengr.com>, R. R. Grant <dgrant@puravidaairstystems.com>
Cc: Josh Long <josh.long@genesisair.com>, Brandon Hawkins <brandon.hawkins@genesisair.com>, Dan Briggs <dbriggs@genesisair.com>, James Adams <jadams@yorkeengr.com>
Subject: RE: Latest test results

Got it, we thought that may be the case so thank you for confirming.
We'll let you know about the schedule for the site visit.

Greg

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From: Benjamin Warner <benjamin@greenbrierhldgs.com>
Sent: Wednesday, October 29, 2025 9:48 AM
To: Greg Wolffe <gwolffe@yorkeengr.com>; Philip Fagundes <pfagundes@fagundesdairy.com>; Sean Gildea <sgildea@yorkeengr.com>; R. R. Grant <dgrant@puravidairsystems.com>
Cc: Josh Long <josh.long@genesissair.com>; Brandon Hawkins <brandon.hawkins@genesissair.com>; Dan Briggs <dbriggs@genesissair.com>; James Adams <jadams@yorkeengr.com>
Subject: Re: Latest test results

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Hi Greg,

There are no dedicated outside air intake fans. Outside air is introduced passively via side openings/doors and exhausted at the ridge (natural ventilation).

Per greenhouse, the estimated outside air flow is approximately **75,000–170,000 CFM (≈ 2–4.5 ACH)** based on conditions, calculated using standard ASHRAE/FAO natural ventilation equations based on the approved County plans (**425 ft ridge length, about 1 ft² of vent area per linear ft at 50 % open, Cd = 0.6, ΔT = 10 °F, and 20 ft stack height**).

Is this a sufficient estimate?

Thank you,
Benjamin

--

Benjamin Warner
Compliance Department
m: (240) 644-5203



From: Greg Wolffe <gwolffe@yorkeengr.com>
Date: Wednesday, October 29, 2025 at 9:13 AM
To: Benjamin Warner <benjamin@greenbrierhldgs.com>, Philip Fagundes <pfagundes@fagundesdairy.com>, Sean Gildea <sgildea@yorkeengr.com>, R. R. Grant <dgrant@puravidairsystems.com>
Cc: Josh Long <josh.long@genesissair.com>, Brandon Hawkins <brandon.hawkins@genesissair.com>, Dan Briggs <dbriggs@genesissair.com>, James Adams <jadams@yorkeengr.com>
Subject: RE: Latest test results

Just to clarify, the CFM we are looking for is ONLY from fans bringing ion outside air into the greenhouse. We do NOT need any CFM for fans that are recirculating air already inside the greenhouses.

Does that make sense?

Thanks,
Greg

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From: Greg Wolffe

Sent: Wednesday, October 29, 2025 9:03 AM

To: 'Benjamin Warner' <benjamin@greenbrierhldgs.com>; Philip Fagundes <pfagundes@fagundesdairy.com>; Sean Gildea <sgildea@yorkeengr.com>; R. R. Grant <dgrant@puravidaairstystems.com>

Cc: Josh Long <josh.long@genesissair.com>; Brandon Hawkins <brandon.hawkins@genesissair.com>; Dan Briggs <dbriggs@genesissair.com>; James Adams <jadams@yorkeengr.com>

Subject: RE: Latest test results

Sounds good, we'll work on getting this coordinated on our side today.

Greg

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From: Benjamin Warner <benjamin@greenbrierhdgs.com>
Sent: Wednesday, October 29, 2025 9:01 AM
To: Greg Wolffe <gwolffe@yorkeengr.com>; Philip Fagundes <pfagundes@fagundesdairy.com>; Sean Gildea <sgildea@yorkeengr.com>; R. R. Grant <dgrant@puravidairsystems.com>
Cc: Josh Long <josh.long@genesissair.com>; Brandon Hawkins <brandon.hawkins@genesissair.com>; Dan Briggs <dbriggs@genesissair.com>; James Adams <jadams@yorkeengr.com>
Subject: Re: Latest test results

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Good morning, Greg.

At the point, I agree that it's best if a Yorke representative comes on-site early next week for OU samples. Please confirm a date and time ASAP; I will plan to be on-site as well.

In the meantime, I'll work on a CFM estimate to the best of my abilities.

Thank you,
Benjamin

--

Benjamin Warner
Compliance Department
m: (240) 644-5203



From: Greg Wolffe <gwolffe@yorkeengr.com>
Date: Tuesday, October 28, 2025 at 5:06 PM
To: Philip Fagundes <pfagundes@fagundesdairy.com>, Benjamin Warner <benjamin@greenbrierhdgs.com>, Sean Gildea <sgildea@yorkeengr.com>, R. R. Grant <dgrant@puravidairsystems.com>
Cc: Josh Long <josh.long@genesissair.com>, Brandon Hawkins <brandon.hawkins@genesissair.com>, Dan Briggs <dbriggs@genesissair.com>, James Adams <jadams@yorkeengr.com>
Subject: RE: Latest test results

It would help if this can be estimated, even round numbers.

Greg

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O: (909) 861-2729 | M: (714) 315-9049

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From: Philip Fagundes <PFagundes@fagundesdairy.com>

Sent: Tuesday, October 28, 2025 5:03 PM

To: Greg Wolffe <gwolffe@yorkeengr.com>; Benjamin Warner <benjamin@greenbrierhdgs.com>; Sean Gildea <sgildea@yorkeengr.com>; R. R. Grant <dgrant@puravidaairstystems.com>

Cc: Josh Long <josh.long@genesissair.com>; Brandon Hawkins <brandon.hawkins@genesissair.com>; Dan Briggs <dbriggs@genesissair.com>; James Adams <jadams@yorkeengr.com>

Subject: Re: Latest test results

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We do not have the cfm information readily available.

Thank you
Philip Fagundes

From: Greg Wolffe <gwolffe@yorkeengr.com>

Sent: Tuesday, October 28, 2025 4:55 PM

To: Benjamin Warner; Sean Gildea; R. R. Grant

Cc: Philip Fagundes; Josh Long; Brandon Hawkins; Dan Briggs; James Adams

Subject: RE: Latest test results

Benjamin, the odor data collected in April last year indicates several things but doesn't help with our overall need. The April data shows D/Ts at the fenceline below the ordinance standard, but we don't have D/Ts inside the processing building because they are all at the maximum 60 D/T value (the peg out using the Nasal Ranger). So, at this point we do not have any usable site-specific data to replace the Autumn Brands inlet values of ~28,000 OU/m3.

We are considering other ways to evaluate the dispersion of the 28k OU inlet concentration based on volumetric flow and time, which we are going to meet on tomorrow and we will let you know what happen with that by around lunchtime.

However, site-specific inlet OU values would be most defensible for the OAP. We can have someone come out as early as the beginning of next week to collect a site-specific OU sample of the greenhouse interior air for lab analysis, if that is needed. The advantage of this would be that the same person from our staff is certified in collecting Nasal Ranger observations, like your observer did in April, and we could compare the lab data with the Nasal Ranger observations to verify OU dispersion to your fence line.

Lastly, for our effort tomorrow, do you have an in-draft rate (cfm) into the greenhouses? This would be equivalent to the air flow rate out the ridge vents in terms of air balance.

Thanks,
Greg

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Greg Wolfe, CPP | Diamond Bar Office
Principal Scientist

O: (909) 861-2729 | M: (714) 315-9049

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From: Benjamin Warner <benjamin@greenbrierhdgs.com>

Sent: Tuesday, October 28, 2025 11:24 AM

To: Sean Gildea <sgildea@yorkeengr.com>; R. R. Grant <dgrant@puravidaairsystems.com>;
Greg Wolfe <gwolffe@yorkeengr.com>

Cc: Philip Fagundes <pfagundes@fagundesdairy.com>; Josh Long <josh.long@genesisair.com>;
Brandon Hawkins <brandon.hawkins@genesisair.com>; Dan Briggs <dbriggs@genesisair.com>

Subject: Re: Latest test results

EXTERNAL EMAIL: This email originated from outside YorkeEngr.com. Please use caution.

Hi Sean & Greg — have you had a chance to review the data provided yesterday? When do you anticipate an updated estimate will be available?

Hi [@R. R. Grant](mailto:R.R.Grant) — when do you anticipate a quote will be available for Phil's review?

Looking forward to maintaining momentum on this.

Thank you,
Benjamin

--

Benjamin Warner
Compliance Department
m: (240) 644-5203



From: Benjamin Warner <benjamin@greenbrierhdgs.com>

Date: Monday, October 27, 2025 at 7:49 AM

To: Sean Gildea <sgildea@yorkeengr.com>, R. R. Grant <dgrant@puravidaairstystems.com>, Greg Wolffe <gwolffe@yorkeengr.com>

Cc: Philip Fagundes <pfagundes@fagundesdairy.com>, Josh Long <josh.long@genesisair.com>, Brandon Hawkins <brandon.hawkins@genesisair.com>, Dan Briggs <dbriggs@genesisair.com>

Subject: Re: Latest test results
Good morning, Sean & Team.

As discussed on Thursday, VCF's internal odor-unit readings (D/T) collected by date, time, activity, and property location are attached for your review. These readings represent typical and worst-case odor levels across the site.

Our goal is to use this dataset to inform your engineering analysis and help determine the **minimum number of Genesis Air units** needed to achieve compliance with the County's **≤ 4 D/T for three minutes at the property line requirement**.

Please use your professional analysis and judgment to establish a defensible **“minimum compliant” configuration** for inclusion in the OAP. We trust your team to recommend what's necessary to meet the requirements while avoiding over-design.

In the meantime, please let us know if you need any clarification(s) on the sampling data or additional information about the site.

Thank you,
Benjamin

--

Benjamin Warner
Compliance Department
m: (240) 644-5203



From: Benjamin Warner <benjamin@greenbrierhldgs.com>
Date: Wednesday, October 22, 2025 at 4:10 PM
To: Sean Gildea <sgildea@yorkeengr.com>, R. R. Grant <dgrant@puravidaairstystems.com>, Greg Wolffe <gwolffe@yorkeengr.com>
Cc: Philip Fagundes <pfagundes@fagundesdairy.com>, Josh Long <josh.long@genesissair.com>, Brandon Hawkins <brandon.hawkins@genesissair.com>, Dan Briggs <dbriggs@genesissair.com>
Subject: Re: Latest test results
 Hi Sean,

I am available for a call tomorrow at 2:30; square footage for each category is as follows:

Total Greenhouse Space (sqft)	Nursery Plants (sqft)	Vegetative Plants (sqft)	Flowering Plants (sqft)	Processing Activities (sqft)
335,848 sq. ft. total (325, 360 sq. ft. planted)	81,340	81,340	162,680	35,200 (1) 8,700 (2)

The D/T threshold set by the County is 4 D/T for 3 minutes at the property line.

Benjamin

--
 Benjamin Warner
 Compliance Department
 m: (240) 644-5203



From: Sean Gildea <sgildea@yorkeengr.com>
Date: Wednesday, October 22, 2025 at 12:36 PM
To: Benjamin Warner <benjamin@greenbrierhldgs.com>, R. R. Grant <dgrant@puravidaairstystems.com>, Greg Wolffe <gwolffe@yorkeengr.com>
Cc: Philip Fagundes <pfagundes@fagundesdairy.com>, Josh Long <josh.long@genesissair.com>, Brandon Hawkins <brandon.hawkins@genesissair.com>, Dan Briggs <dbriggs@genesissair.com>
Subject: RE: Latest test results
 Hi Benjamin,

After completing review, we were able to update a few assumptions and reduce the amount of units per acre; our methodology will require 11 units per acre for flowering and processing areas, 6 units per acre for plant area in the vegetative stage, and 0 units per acre for nursery areas. I've attached our calculation workbook with the detailed methodology; the main concept uses principles of air dispersion to develop a relationship between a "target" odor concentration at the ridge vents and a person standing at the property fenceline experiencing the **7 D/T**. An assumed control efficiency and the number of passthroughs per hour are used to reduce the expected plant odors from "ambient" (or "uncontrolled") to the target "controlled" level. It might be helpful to schedule a call this week to explain the thought process, are you available tomorrow at 2:30PM?

To calculate the total amount of units, we'll need the square footage for each category. Can you provide the

following acreage or square footage for plants in each stage shown in the table below?

Total Greenhouse Space (sqft)	Nursery Plants (sqft)	Vegetative Plants (sqft)	Flowering Plants (sqft)	Processing Activities (sqft)
				35,200 (1) 8,700 (2)

1. – Processing Building footprint, from previous OAP.
2. – Total area of processing activities in greenhouse (including drying, trimming, and storage), from previous OAP.

Thank you,

Yorke Service Areas Include: Air Quality, Storm Water, Hazardous Waste, Industrial Hygiene-Safety, and CEQA Technical Reports. For a more detailed list: www.YorkeEngr.com/Services.

**Sean Gildea, MSEnvE, PE, CPP | San Juan Capistrano Office
Senior Engineer**

O: (949) 248-8490 | M: (949) 201-0605

SGildea@YorkeEngr.com | [V-card Link](#)

Yorke Engineering, LLC | Corporate Office

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From: Benjamin Warner <benjamin@greenbrierhldgs.com>

Sent: Wednesday, October 22, 2025 10:37 AM

To: Sean Gildea <sgildea@yorkeengr.com>; R. R. Grant <dgrant@puravidaairstystems.com>;
Greg Wolffe <gwolffe@yorkeengr.com>

Cc: Philip Fagundes <pfagundes@fagundesdairy.com>; Josh Long <josh.long@genesisair.com>;
Brandon Hawkins <brandon.hawkins@genesisair.com>; Dan Briggs <dbriggs@genesisair.com>

Subject: Re: Latest test results

EXTERNAL EMAIL: This email originated from outside YorkeEngr.com. Please use caution.

Good morning, Sean.

Thanks for the heads-up and for double-checking the assumptions.

Ownership's guidance is to target the lowest practical unit count that can still be engineer-certified to meet the County's ≤ 4 D/T for 3 minutes at the property line. In other words: a minimum compliant configuration, with the option to add units later if field verification indicates we need more.

Looking forward to the update.

Thank you,
Benjamin

--
Benjamin Warner
Compliance Department
m: (240) 644-5203



From: Sean Gildea <sgildea@yorkeengr.com>
Date: Tuesday, October 21, 2025 at 7:57 PM
To: Benjamin Warner <benjamin@greenbrierhdgs.com>, R. R. Grant <dgrant@puravidaairstystems.com>, Greg Wolffe <gwolffe@yorkeengr.com>
Cc: Philip Fagundes <pfagundes@fagundesdairy.com>, Josh Long <josh.long@genesisair.com>, Brandon Hawkins <brandon.hawkins@genesisair.com>, Dan Briggs <dbriggs@genesisair.com>
Subject: RE: Latest test results
Hi Benjamin & Team,

We completed a draft of our assessment and calculations for units per acre, however preliminary results were not as low as we were expecting; we're doing another round of review of our assumptions and calculations and we'll provide an update tomorrow morning as soon as we can.

Thanks,

Yorke Service Areas Include: Air Quality, Storm Water, Hazardous Waste, Industrial Hygiene-Safety, and CEQA Technical Reports. For a more detailed list: www.YorkeEngr.com/Services.

**Sean Gildea, MSEnV, PE, CPP | San Juan Capistrano Office
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From: Benjamin Warner <benjamin@greenbrierhdgs.com>
Sent: Tuesday, October 21, 2025 7:34 AM
To: Sean Gildea <sgildea@yorkeengr.com>; R. R. Grant <dgrant@puravidaairstystems.com>; Greg Wolffe <gwolffe@yorkeengr.com>
Cc: Philip Fagundes <pfagundes@fagundesdairy.com>; Josh Long <josh.long@genesisair.com>; Brandon Hawkins <brandon.hawkins@genesisair.com>; Dan Briggs <dbriggs@genesisair.com>
Subject: Re: Latest test results
Importance: High

EXTERNAL EMAIL: This email originated from outside YorkeEngr.com. Please use caution.

Good morning, Sean – looking forward to reviewing new information and amounts.

Thank you,
Benjamin

--

Benjamin Warner
Compliance Department
m: (240) 644-5203



From: Sean Gildea <sgildea@yorkeengr.com>

Date: Friday, October 17, 2025 at 6:49 PM

To: Benjamin Warner <benjamin@greenbrierhldgs.com>, R. R. Grant <dgrant@puravidaairstystems.com>, Greg Wolffe <gwolffe@yorkeengr.com>

Cc: Philip Fagundes <pfagundes@fagundesdairy.com>, Josh Long <josh.long@genesisair.com>, Brandon Hawkins <brandon.hawkins@genesisair.com>, Dan Briggs <dbriggs@genesisair.com>

Subject: RE: Latest test results

Hi Benjamin,

We have come up with a method to calculate the units per acre. We had a productive call with the Genesis team today and they will be providing us with some information early next week that we will use to complete our calculations. We estimate to have an amount ready to send to you by Tuesday.

Thank you,

Yorke Service Areas Include: Air Quality, Storm Water, Hazardous Waste, Industrial Hygiene-Safety, and CEQA Technical Reports. For a more detailed list: www.YorkeEngr.com/Services.

**Sean Gildea, MSEnvE, PE, CPP | San Juan Capistrano Office
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From: Benjamin Warner <benjamin@greenbrierhldgs.com>

Sent: Thursday, October 16, 2025 3:53 PM

To: R. R. Grant <dgrant@puravidaairstystems.com>; Sean Gildea <sgildea@yorkeengr.com>; Greg Wolffe <gwolffe@yorkeengr.com>

Cc: Philip Fagundes <pfagundes@fagundesdairy.com>; Josh Long <josh.long@genesisair.com>; Brandon Hawkins <brandon.hawkins@genesisair.com>; Dan Briggs <dbriggs@genesisair.com>

Subject: Re: Latest test results

EXTERNAL EMAIL: This email originated from outside YorkeEngr.com. Please use caution.

Good afternoon, Sean & Greg – as previously discussed, we're looking forward to reviewing your units per acre recommendation tomorrow.

Please let me know if there will be a delay in determination for any reason.

Thank you,
Benjamin

--

Benjamin Warner
Compliance Department
m: (240) 644-5203



From: R. R. Grant <dgrant@puravidaairstystems.com>

Date: Wednesday, October 8, 2025 at 12:26 PM

To: Sean Gildea <sgildea@yorkeengr.com>, Greg Wolffe <gwolffe@yorkeengr.com>, Benjamin Warner <benjamin@greenbrierhldgs.com>, Philip Fagundes <pfagundes@fagundesdairy.com>, Josh Long <josh.long@genesissair.com>, Brandon Hawkins <brandon.hawkins@genesissair.com>, Dan Briggs <dbriggs@genesissair.com>

Subject: Re: Latest test results

Here is the test we discussed.

R. R. (Dick) Grant, P.E.(Inactive)
207 Devine Street
San Antonio, Texas 78210

210-867-3500

dgrant@puravidaairstystems.com

<https://www.puravidaairstystems.com>



"Nothing in the world can take the place of persistence. Talent will not; nothing is more common than unsuccessful men with talent. Genius will not; unrewarded genius is almost a proverb. Education will not; the world is full of educated derelicts. Persistence and determination alone are omnipotent. The slogan 'Press On' has solved and always will solve the problems of the human race."

Calvin Coolidge

From: Dick Grant <dgrant@puravidaairstystems.com>
Date: Wednesday, October 8, 2025 at 1:46 PM
To: Sean Gildea <sgildea@yorkeengr.com>, Greg Wolffe <gwolffe@yorkeengr.com>, Benjamin Warner <benjamin@greenbrierhldgs.com>, Philip Fagundes <pfagundes@fagundesdairy.com>, Josh Long <josh.long@genesisair.com>, Brandon Hawkins <brandon.hawkins@genesisair.com>, Dan Briggs <dbriggs@genesisair.com>
Subject: Latest test results

Attached is the latest test results.

R. R. (Dick) Grant, P.E.(Inactive)
207 Devine Street
San Antonio, Texas 78210

210-867-3500
dgrant@puravidaairstystems.com
<https://www.puravidaairstystems.com>



"Nothing in the world can take the place of persistence. Talent will not; nothing is more common than unsuccessful men with talent. Genius will not; unrewarded genius is almost a proverb. Education will not; the world is full of educated derelicts. Persistence and determination alone are omnipotent. The slogan 'Press On' has solved and always will solve the problems of the human race."

Calvin Coolidge

ATTACHMENT 3b – FINDINGS FOR DENIAL

1.0 CEQA FINDINGS

Pursuant to CEQA Guidelines Section 15270, The Board of Supervisors finds that CEQA does not apply to projects which a public agency rejects or disapproves.

2.0 ADMINISTRATIVE FINDINGS – ODOR ABATEMENT PLAN EXTENSION

2.1 Section 35-144U.A.2.f.2 - Extensions. (This provision is only applicable to 35-144U.C.7 - Odor Abatement Plans) A one-time extension of the implementation time period described above may be allowed for up to 12 months. The request for an extension shall be heard by the Board of Supervisors with a recommendation by the Director. A request for an extension must be submitted 90 days prior to the expiration of the implementation period and approved by the Board of Supervisors. Requests for extensions may include, but not be limited to:

- a. Supply chain delays**
- b. On-site power supply upgrades**
- c. Off-site power supply upgrades and availability**
- d. Other circumstances as determined by the Director**

On December 17, 2025, the applicant submitted an Extension application (Attachment 3a) citing supply chain delays. The application includes a series of emails with Yorke Engineering beginning on October 8, 2025 and ranging to November 17, 2025, but this exchange ended abruptly without explanation. Following this, the application includes email correspondence with Precision Engineering dated December 10, 2025 confirming they will work with Genesis Air Systems and the operator to complete an OAP for submittal to the County. The operator submitted an OAP revision application prepared by Precision Engineering to P&D on February 2, 2026, which is currently under review.

The application also includes a sales order from Genesis Air dated December 17, 2025 confirming (45) units were ordered and in the production queue. Lead time for production was estimated to be six (6) weeks and an estimated completion date for the units to ship was identified as January 30, 2026. This date was then delayed due to weather to February 10, 2026. As of the docketing of this board letter, the applicant has taken delivery of (14) of the (45) units. The remaining (31) units are expected for delivery on March 5, 2026.

According to the extension application, the owner began actively working to comply with the amended ordinance requirements starting in October 2025 approximately seven months after the Board amended the code. On October 8, 2025 they first contacted Yorke Engineering to initiate services. Because the applicant did not proactively pursue compliance efforts with the amended odor abatement requirements until October 2025, the Board of Supervisors finds that the timing of the applicant's compliance efforts was insufficient and that the March 18, 2026 deadline could have reasonably been met had those efforts started earlier. Additionally, the application does not adequately demonstrate the criteria for extension listed in Section 35-144U.A.2.f.2. The delay in bringing the operation into compliance with the ordinance was primarily caused by the owner's lack of diligence, not supply chain delays, on or off-site power supply upgrades, or other similar circumstances that were outside the owner's control. Therefore, the Board of Supervisors finds there is not sufficient evidence in the record to support the request for a time extension pursuant to Section 35-144.U.A.2.f.2 and the subject request is denied.

ATTACHMENT 3c – NOTICE OF EXEMPTION

TO: Santa Barbara County Clerk of the Board of Supervisors

FROM: Errin Brings, Planning and Development Department

The project or activity identified below is determined to be exempt from further environmental review requirements of the California Environmental Quality Act (CEQA) of 1970, as defined in the State and County Guidelines for the implementation of CEQA.

APN: 001-030-022

Case No.: 26TEX-00001

Location: 5980 Casitas Pass Road, Carpinteria, CA 93013

Project Title: Valley Crest - Time Extension Request for Installation of Multi-Technology Carbon Filtration

Project Applicant: Valley Crest Farms

Project Description: Disapproval of Case No. 26TEX-00001 includes a denial of the request for a one-time, twelve-month extension of the implementation deadline for installation of the Multi-Technology Carbon Filtration Odor System, from March 18, 2026 to March 18, 2027, pursuant to Santa Barbara County Coastal Zoning Ordinance Section 35-144U.A.2.f.2.

The existing cannabis operation is permitted with a Coastal Development Permit and consists of 8.98 acres of cultivation and processing. The property is a 15.32-acre parcel zoned AG-I-10 and shown as Assessor’s Parcel Number 001-030-022, located at 5980 Casitas Pass Road, Carpinteria, CA, First Supervisorial District.

Name of Public Agency Approving Project: County of Santa Barbara

Name of Person or Entity Carrying Out Project: Benjamin Warner

Exempt Status:

- Ministerial
- Statutory Exemption
- Categorical Exemption
- Emergency Project
- Declared Emergency

Cite specific CEQA and/or CEQA Guidelines Section: State CEQA Guidelines Section 15270

Valley Crest Farms Odor Abatement Plan Extension, Case No. 26TEX-00001
March 10, 2026
Attachment 3c

Reasons to support exemption findings: Pursuant to CEQA Guidelines Section 15270, CEQA does not apply to projects which a public agency rejects or disapproves.

Lead Agency Contact Person: Errin Briggs

Phone: (805) 568-2047

Department/Division Representative:



Date: March 10, 2026

Acceptance Date: _____

Distribution: Hearing Support Staff

Date Filed by County Clerk: _____