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July 30, 2020

Mr. Andrew Trippel, Senior Planner
City of Santa Rosa
Planning & Economic Development
100 Santa Rosa Avenue, Room 3
Santa Rosa, CA 95404

RE: Draft Mitigated Negative Declaration (MND) for the City of Santa Rosa for The Santa Rosa Farm Group – Cannabis Cultivation, Manufacture, and Distribution Facility

Dear Mr. Trippel,

Bay Area Air Quality Management District (Air District) staff has reviewed the Mitigated Negative Declaration (MND) for the proposed Cannabis Cultivation, Manufacture, and Distribution Facility with The Santa Rosa Farm Group (Project.) The Santa Rosa Farm Group proposes to redevelop an industrially-zoned parcel with an approximately 120,000-square-foot cannabis facility for commercial cultivation, manufacturing, and distribution uses.

Air District staff appreciates and supports efforts to incorporate best practices into the Project's design to minimize air quality and climate impacts such as:

- Increasing diversion of construction waste;
- Using electrified construction equipment or alternative fuels;
- Reclaiming and reusing wastewater from cannabis cultivation operations to irrigate the landscape; and
- Implementing an odor control plan for objectional cannabis odors.

The Project currently proposes to use electricity from a natural gas powered cogenerator system. Air District staff strongly encourages the Project to install on-site solar panels for a portion or all of the Project's energy consumption, coupled with Sonoma Clean Power renewable energy to help support the State's effort to achieve carbon neutrality under Executive Order B-55-18, reaching 100 percent clean energy by 2045.

Air District staff appreciates the Project's efforts to address air quality and health impacts and for incorporating construction best management practices. However, Air District staff recommends the MND analyze potential impacts from the Project on nearby residents adjacent to the Project site. To address cumulative impacts and potential health risks from the Project's operations, the Air District recommends the

MND include an analysis of potential local risks and hazards associated with toxic air contaminants (TACs) and fine particulate matter (PM2.5), including emissions from the Project itself and nearby stationary and mobile sources. If the Project chooses to pursue using a natural gas generator, staff recommends that the MND demonstrate how the Project will comply with Air District Regulation 2, Rule 5 New Source Review of Toxic Air Contaminants.

We encourage the City to contact Air District staff with any questions and/or to request assistance during the environmental review process. If you have any questions regarding these comments, or would like to schedule a meeting, please contact Areana Flores, Environmental Planner, at (415) 749-4616, or aflores@baaqmd.gov.

Sincerely,



Greg Nudd
Deputy Air Pollution Control Officer

cc: BAAQMD Director Shirlee Zane
BAAQMD Director Teresa Barrett