

GREENBERG GLUSKER FIELDS CLAMAN
& MACHTINGER LLP
2049 Century Park East, Suite 2600
Los Angeles, California 90067

1 NOAH PERCH-AHERN (SBN 262164)
NPerchAhern@ggfirm.com
2 SEDINA L. BANKS (SBN 229193)
SBanks@ggfirm.com
3 GREENBERG GLUSKER FIELDS CLAMAN &
MACHTINGER LLP
4 2049 Century Park East, Suite 2600
Los Angeles, California 90067
5 Telephone: 310-553-3610
Facsimile: 310-553-0687

6 Counsel for Respondents
7 Central Coast Agriculture, Inc.; Central Coast Agriculture, LLC;
Central Coast AG Distribution, LLC; Central Coast AG
8 Farming, LLC; Central Coast AG Products, LLC

9
10 **BEFORE THE HEARING BOARD OF THE AIR POLLUTION**
11 **CONTROL DISTRICT, COUNTY OF SANTA BARBARA**

12 **In the Matter of**

13 AERON ARLIN GENET, Santa Barbara
14 County Air Pollution Control Officer,

15 v.

16 CENTRAL COAST AGRICULTURE, INC.;
17 CENTRAL COAST AGRICULTURE, LLC;
CENTRAL COAST AG DISTRIBUTION,
18 LLC; CENTRAL COAST AG FARMING,
19 LLC; CENTRAL COAST AG PRODUCTS,
20 LLC

Case No. H.B. Case No. 2023-03-A

AFFIDAVIT OF LINDSAY COKELEY

Hearing Date: October 4, 2023 (or as may
be continued)
Time: 9:30 a.m.
Place: Board of Supervisors Hearing Room
511 East Lakeside Parkway
Santa Maria, CA 93455

21 **AFFIDAVIT OF LINDSAY COKELEY**

22 I, Lindsay Cokeley, declare and state as follows:

- 23 1. I am employed by Respondent Central Coast Agriculture, Inc. as a Director in the
24 Compliance Division. I have personal knowledge of the matters set forth herein and can
25 and will testify thereto if called upon to do so.
26 2. Pursuant to the Hearing Board’s Policies & Procedures, I submit this affidavit in support
27 of Respondents’ Central Coast Agriculture, Inc., Central Coast Agriculture, LLC, Central
28 Coast Ag Distribution, LLC, Central Coast Ag Farming, LLC, and Central Coast Ag

**GREENBERG GLUSKER FIELDS CLAMAN
& MACHTINGER LLP**
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1 Products, LLC (collectively “CCA”) Answer to the Santa Barbara County Air Pollution
2 Control District’s (“District”) “PETITION FOR ORDER OF ABATEMENT
3 REGARDING CANNABIS MANUFACTURING, EXTRACTION, STORAGE, AND
4 DISTRIBUTION FACILITIES LOCATED AT 1201 WEST CHESTNUT AVENUE
5 AND 1200 WEST LAUREL AVENUE, LOMPOC, CALIFORNIA” (“Petition”) and the
6 above-referenced Hearing scheduled for October 4, 2023, or as may be continued.

7 3. I declare that a true and correct copy of the evidence cited below is attached to this
8 affidavit as Exhibits 1 – 19:

9 a. A March 8, 2019 Application (No. 15344) by CCA to the District for Authority to
10 Construct (ATC) and Permit to Operate (PTO) an emergency standby diesel
11 engine at CCA’s facility located at 1201 W. Chestnut Ave., Lompoc, CA 93436
12 (“Chestnut Facility”). (CCA EXH. 1)

13 b. A June 11 through June 24, 2021 email exchange between District staff and CCA
14 personnel regarding CCA’s request for an Interim Permit Approval Process (IPAP)
15 for the following ATC or PTO: 15702, 15709, 15731, 15692, and 15650. (CCA
16 EXH. 2)

17 c. An August 20 through August 26, 2021 email exchange and attachment between
18 District staff and CCA personnel regarding Best Available Control Technology
19 (“BACT”) determinations for ATC 15634. (CCA EXH. 3)

20 d. An October 5 through October 27, 2021 email exchange between District staff and
21 CCA personnel regarding CCA’s response to the District’s incomplete letter for
22 ATC/PTO 15634 for the Chestnut/Laurel cannabis processing facility. (CCA
23 EXH. 4)

24 e. A December 23, 2021 letter from District Air Quality Engineer III, Kevin Brown,
25 regarding Incomplete ATC Application 15634. (CCA EXH. 5)

26 f. A February 14 through April 5, 2022 email exchange and attachment letter
27 between District staff and CCA personnel regarding the District’s Request for
28 Deposit for CEQA Lead Agency review of air quality information for Central

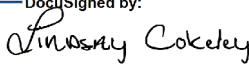
- 1 Coast Agriculture (ATC 15634) and CCA's meeting request to discuss the CEQA
2 review process. (CCA EXH. 6)
- 3 g. A May 20 through July 20, 2022 email exchange with attachments between Mr.
4 Brown and CCA personnel regarding information needed for ATC 15634
5 Application Incompleteness Letter and CCA's initial response on July 13, 2022.
6 (CCA EXH. 7)
- 7 h. An October 21 through November 10, 2022 email exchange between District staff
8 and CCA personnel regarding ATC Application 15634 – Notification of
9 Contractor Support. (CCA EXH. 8)
- 10 i. An October 12, 2022 through January 26, 2023 email exchange between District
11 staff and CCA personnel regarding a potential Compliance Agreement for the
12 Chestnut Facility. (CCA EXH. 9)
- 13 j. An ATC Application for the Chestnut Facility submitted by myself to the District
14 via email on April 27, 2023, including my transmittal email and application
15 attachments. (CCA EXH. 10)
- 16 k. An April 27 through May 31, 2023 email exchange between myself and District
17 staff regarding CCA's ATC Application at the Chestnut Facility in which the
18 District a) requests that CCA resubmit its application pursuant to the District's
19 Confidential Information Policy, b) confirms that the application is deemed
20 received on April 27, 2023, and c) indicates when it will send its response to CCA.
21 (CCA EXH. 11)
- 22 l. A June 1 through July 20, 2023 email exchange between District staff and CCA
23 personnel regarding the District's Incomplete Letter for ATC 16090 and CCA's
24 initial response. (CCA EXH. 12)
- 25 m. A September 1 through September 6, 2023 email exchange with attachments
26 between myself and District Air Quality Engineer III, Agnieska Letts, regarding
27 data and information responsive to the District's Incomplete Letter for ATC
28 16090. (CCA EXH. 13)

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- n. A September 5, 2023 email from myself to Ms. Letts requesting guidance on CCA’s equipment list for ATC 16090. (CCA EXH. 14)
- o. A September 7, 2023 email and attachment from myself to Ms. Letts regarding CCA’s combustion source emission calculations. (CCA EXH. 15)
- p. A September 20 through September 21, 2023 email exchange between myself and District staff regarding CCA’s request for a virtual meeting or phone call for progress on CCA’s ATC Application. (CCA EXH. 16)
- q. A September 18 through September 21, 2023 email exchange and attachments between District staff and CCA personnel regarding CCA’s data and responses to requests for information received by the District on August 31; September 13; and September 15, 2023 and edits to the Due Diligence sheet. (CCA EXH. 17)
- r. A calendar image showing CCA’s involvement in the Food Bank for Lompoc residents from June 2022 to December 2023. (CCA EXH. 18)
- s. An advisory notice by the District titled “Updated Advisory – Air Quality and Cannabis Operations.” Available online at:
<https://mailchi.mp/853ec01509e5/cannabisadvisory> (CCA EXH. 19)

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct and that, if sworn as a witness, I could competently testify to the foregoing. Executed this 22nd day of September, 2023, in Buellton, CA.

DocuSigned by:

 C498B362C2284C2...
 Lindsay Cokeley

PROOF OF SERVICE

I am a resident of the state of California, over the age of eighteen years, and not a party to the within-action. My business address is 2049 Century Park East, Suite 2600, Los Angeles, California 90067.

On *September 22, 2023*, I served a copy of the within document: **AFFIDAVIT OF LINDSAY COKELEY** on the interested parties in this action as follows:

Lorena Saldana, Board Clerk
Santa Barbara County Air Pollution Control District
260 N. San Antonio Rd., Suite, A
Santa Barbara, CA 93110
E-mail: LAS@sbcapcd.org

Aeron Arlin Genet
Director and Air Pollution Control Office
Santa Barbara County Air Pollution Control District
260 N. San Antonio Rd., Suite, A
Santa Barbara, CA 93110
E-Mail: ArlingenetA@sbcapcd.org

Ms. Jennifer Richardson, Division Chief
Santa Barbara County
County Counsel's Office
105 East Anapamu, Suite 201
Santa Barbara, CA 93101
E-mail: jrichardson@co.santa-barbara.ca.us

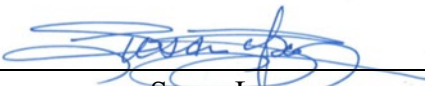
- (BY MAIL)** By placing the document(s) listed above in sealed envelope(s) in a designated "OUT" box in the office of my employer. I am readily familiar with the firm's practice of collection and processing correspondence for mailing. Under that practice it would be deposited with the United States Postal Service on that same day with postage thereon fully prepaid. (CCP Section 1013a, 2015.5, FRCP section 5(B), or FRAP 25(d).
- (BY FEDERAL EXPRESS)** By placing a copy of the document(s) listed above in a sealed envelope to above addressee(s) and sending it via Federal Express, with delivery fees provided for. I know that in the ordinary course of business at this office said document(s) will be deposited in a box or other facility regularly maintained by Federal Express or delivered to an authorized courier or driver of Federal Express for next day delivery. (CCP Sections 1013(c), 2015.5)
- (BY PERSONAL DELIVERY)** By providing a copy of the document(s) listed above in a sealed envelope to an attorney service with instructions to personally deliver the envelope(s) as listed above on _____.

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(BY E-MAIL) I caused a true copy of the foregoing document to be served by e-mail at the e-mail address set forth above. Each e-mail was complete and no reports of error were received.

I declare under penalty of perjury under the laws of the State of California that the above is true and correct.

Executed on *September 22, 2023*, at Los Angeles, California.



Susan Lopez