

REDACTED

From: **Molly M. Pearson** <PearsonM@sbcapcd.org>

Date: Tue, Apr 5, 2022 at 2:19 PM

Subject: RE: Meeting request follow-up - CCA Manufacturing

To: Lindsay Cokeley <lindsay@ccagriculture.com>

Cc: William S. Sarraf <SarrafW@sbcapcd.org>, David I. Harris <HarrisD@sbcapcd.org>, Matthew Allen <matthew@ccagriculture.com>

Hi Lindsay,

We believe it would be most productive to hold off on a meeting until all the information requested in our application incompleteness letter is available and we have had a chance to review.

Alternatively, we are open to meeting prior to the complete data submittal if you would prefer to provide an initial set of data first.

In the interest of making this a productive meeting for all, I'd like to have a very clear understanding of what items will be covered, by whom, and the names and roles of all individuals participating in the meeting. Please provide us with a list of questions ahead of time, so we can be better prepared for the meeting.

Once you've prepared the items above related to the requested meeting, please send us some potential meeting times and we can work with our counsel and staff to set up a meeting.

Thanks, Molly

CCA EXH. 6

From: Lindsay Cokeley <lindsay@ccagriculture.com>
Sent: Friday, April 1, 2022 6:24 PM
To: Molly M. Pearson <PearsonM@sbcapcd.org>
Cc: William S. Sarraf <SarrafW@sbcapcd.org>; David I. Harris <HarrisD@sbcapcd.org>; Matthew Allen <matthew@ccagriculture.com>
Subject: Re: Meeting request follow-up - CCA Manufacturing

Hi Molly,

Thank you for getting back to me. Kevin Brown had mentioned there were a few questions in the incomplete letter that weren't directly related to the permit from his side that either came from planning or compliance. The first four questions included the need for detailed information concerning historical solvent usage, criteria pollutant emissions and GHG emissions going back to the inception of the facility's operations. We are working on gathering that information still. There might be an initial set of data that may help inform the applicable CEQA review, so we can certainly send that over first. We believe this initial set of data will provide sufficient information to have an initial discussion about CEQA review and objectives.

Additionally, these requests for historical information have come fairly late into the permit process, so we would like to discuss at the meeting what our options might be to separate the CEQA review process from the ATC process in order to not have one hold up the other.

To answer your question about who would need to be present, we would like to have our internal CCA team including myself and Matt Allen, General Counsel, as well as outside counsel. We would expect District counsel would also need to be present for this meeting. Please let us know how we can facilitate this meeting in order to help expedite our permit review and CEQA process concurrently.

Thank you,

Lindsay Cokeley
Director, Compliance | CCA

On Tue, Mar 29, 2022 at 6:20 PM Molly M. Pearson <PearsonM@sbcapcd.org> wrote:

Hello Lindsay,

I apologize for not replying sooner, I am doing catchup after being out last week.

I'm tagging onto your prior email but I've changed the subject line, removed our admin/fiscal staff, and added our Engineering Division Manager, David Harris.

Regarding your request for a meeting to discuss CEQA review, it would be a more informative

discussion if we had responses to the permit application completeness items prior to meeting. Do you have an estimated date for when that information will be provided? We would need some time to review the submittal prior to the meeting, and we would want to have an agenda and a list of meeting participants in advance of the meeting.

Thanks, Molly



Molly Pearson

Planning Division Manager
Air Pollution Control District
Santa Barbara County

PearsonM@sbcapcd.org
[805.979.8327](tel:805.979.8327)

ourair.org [@OurAirSBC](https://twitter.com/OurAirSBC)

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From: Lindsay Cokeley <lindsay@ccagriculture.com>
Sent: Thursday, March 24, 2022 9:53 AM
To: Maria Sales <SalesM@sbcapcd.org>
Cc: William S. Sarraf <SarrafW@sbcapcd.org>; Kristina N. Aguilar <AguilarK@sbcapcd.org>; Rachael A. Silva <SilvaR@sbcapcd.org>; Molly M. Pearson <PearsonM@sbcapcd.org>
Subject: Re: CCA Manufacturing Request for Deposit Letter

Hello,

I am just following up on my last email requesting a meeting to discuss our CEQA review. Can you confirm receipt and some times that might work?

Thank you,

Lindsay Cokeley
Director, Compliance | CCA

On Mon, Mar 21, 2022 at 5:51 PM Lindsay Cokeley <lindsay@ccagriculture.com> wrote:

Hi Maria,

Please see attached, apologies for the delay as I have been in and out of the office for the last few weeks on sick leave. I have submitted the deposit in the mail with the check due to arrive this week. We are hoping to schedule a call with Molly and other District staff in the near future regarding this project's CEQA review. Who would be the best person to reach out to to schedule this?

Thank you,

Lindsay Cokeley

Director, Compliance | CCA

On Mon, Feb 14, 2022 at 8:24 AM Maria Sales <SalesM@sbcapcd.org> wrote:

Dear Ms. Lindsay Cokeley:

Attached is a copy of the Santa Barbara County Air Pollution Control District Request for Deposit for CEQA Lead Agency review of air quality information for Central Coast Agriculture (ATC 15634)

A hard copy of this letter will be mailed out as well.

Should you have any questions regarding this letter, please contact Molly Pearson on her staff at (805) 979-8327, or PearsonM@sbcapcd.org.

Thank you!

Have a Wonderful Day!



Maria San Juana Sales
Office Technician
Air Pollution Control District
Santa Barbara County

SalesM@sbcapcd.org
(805) 979-8295

ourair.org [@OurAirSBC](https://twitter.com/OurAirSBC)

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February 14, 2022

Central Coast Agriculture, LLC
Attn: Lindsay Cokeley
85 W. Highway 246, #233
Buellton, CA 93427

Electronic lindsay@ccagriculture.com

Re: Santa Barbara County Air Pollution Control District Request for Deposit for CEQA Lead Agency review of air quality information for Central Coast Agriculture (ATC 15634)

Deposit Required: \$6,400

Dear Lindsay Cokeley:

The purpose of this letter is to notify you that the above-referenced project will be set up for cost reimbursement pursuant to District Rule 210 Section III.C.4., and also to request an initial fee deposit to cover the first 90 days of work for this project. You will be billed for actual costs incurred by the District on a cost reimbursement basis consistent with District Rule 210, Section I.C.d. District costs will be assessed based on the hourly rates of our staff and the actual time worked on your project.

The District received your request for a District permit for the project, and the District will be a lead agency under the California Environmental Quality Act (CEQA) for this project. Based on our review thus far, the project is expected to require significant staff time to review air quality impacts in the context of the District's adopted CEQA thresholds and guidelines.

Attachment 1 outlines the District staff hours estimated for the review of air quality impacts and associated data, preliminary review of health risk assessment or air quality impact analysis, preparation of mitigation measures, recommended conditions of approval, additional meetings, and any other unanticipated work on the project.

The District will bill you monthly for all incurred expenses and you'll be required to reimburse the District within thirty (30) days after the date of the monthly invoice. This process ensures sufficient funds are kept on deposit with the District to authorize necessary expenditures without delaying the work to be performed. Be advised that the deposit is based on estimated costs and that actual costs may differ. If, during the course of conducting this work, we anticipate that actual costs will exceed the initial deposit, we will request an additional deposit. Please submit the requested deposit amount within 30 calendar days of the above date.

1. **Please submit \$6,400.** Any unused funds will be refunded by the District.
2. **Please sign and return a copy of Attachment 1** acknowledging your receipt of this notice and return to Rachael Silva, District Administrative Supervisor, **by March 16, 2022.**

If you have any questions regarding this request or wish to discuss any issue presented above, please contact me at PearsonM@sbcapcd.org or (805) 979-8327. Thank you for your cooperation.

Aeron Arlin Genet, Air Pollution Control Officer


📞 805.961.8800

📍 260 N. San Antonio Rd., Ste. A Santa Barbara, CA 93110

🌐 ourair.org

🐦 [@OurAirSBC](https://twitter.com/OurAirSBC)

Sincerely,

A handwritten signature in black ink that reads "Molly Pearson". The signature is fluid and cursive, with a long horizontal flourish extending to the right.

Molly Pearson, Division Manager
District Planning Division

Attachment (1)

cc: David Harris, Manager, District Engineering Division (email only)
William Sarraf, Supervisor, District Engineering Division (email only)
Kristina Aguilar, Manager, District Administrative Division (email only)
Rachael Silva, Supervisor, District Administrative Division (email only)
Planning Chron File

Attachment 1

District Processing Time and Fees for Central Coast Agriculture (ATC 15634)

The amount of the deposit is based upon the activities estimated below:

Estimated Staff Time	Activity	Estimated Time frame	Approximate Cost/Deposit Amount
17 hours	Review of air quality information provided in response to District incompleteness letter(s), including stationary, mobile, area, direct and indirect sources emission estimates. Provide written feedback to project proponent.	Mar-Apr, 2022	\$2,600
15 hours	Review of air quality impacts for all project activities that are subject to the District's CEQA lead agency action (e.g., adequacy of data, health risk assessment, air quality impact assessment (AQIA), mitigation, conditions of approval, meetings). Provide written feedback to project proponent.	Apr-May 2022	\$2,600
10 hours	Other work as necessary to determine appropriate CEQA determination for the District's permit action, such as meetings, consultations with other District staff and representative, and other unforeseen tasks.	Mar-May 2022	\$1,200
		Total	\$6,400

Received By _____

Date _____

**Lindsay Cokeley, Compliance Supervisor, or
Authorized Company Representative**

Please return a signed copy of this page to: Rachael Silva, District Administrative Supervisor, Santa Barbara County Air Pollution Control District, 260 N. San Antonio Road, Suite A, Santa Barbara 93110.