Appendix A

Notice of Preparation and Scoping Comments

NOTICE OF PREPARATION

TO: State Clearinghouse
Governor's Office of Planning and Research
1400 Tenth Street
Sacramento, CA 95812

FROM: Kathy Pfeifer, Planner
Santa Barbara County
Planning & Development
123 East Anapamu Street
Santa Barbara, CA 93101

SUBJECT: **Notice of Preparation of a Draft Supplement to the Lompoc Wind Energy Project Environmental Impact Report for the Strauss Wind Energy Project**

PROJECT NAME: **Strauss Wind Energy Project**

PROJECT LOCATION: The Project would be located southwest of the City of Lompoc

PROJECT CASE #: 16CUP-00000-00031, 18CDP-00000-00001, and 18VAR-00000-00002

PROJECT APPLICANT: Strauss Wind, LLC

The County of Santa Barbara will be the Lead Agency and will prepare a Supplement to the Lompoc Wind Energy Project's Environmental Impact Report (SEIR) for the Project identified above. We need to know the views of your agency as to the scope and content of the environmental information which is germane to your agency's statutory responsibilities in connection with the proposed Project. Your agency will need to use the SEIR prepared by our agency when considering your permit or other approval for the Project.

The Project description, location and the potential environmental effects are contained in the attached materials.

A Scoping Meeting has been scheduled for **July 19, 2018 at 6:00 pm**. For the convenience of property owners and residents in the Project area, the scoping meeting will be held in the **Lompoc City Council Chambers 100 Civic Center Plaza, in the City of Lompoc**. The Scoping Meeting discussion will be limited to understanding the proposed Project and associated environmental concerns, including potential mitigation measures and possible alternatives to the Project. The attached Project overview and scope of analysis identified by P&D staff will be used as a starting point for discussion during the scoping meeting, but other environmental concerns may be raised by the public at this meeting.

For current Project information, the following page has been established on the County's website: http://sbcountyplanning.org/energy/projects/StraussWind.asp.

Due to the time limits mandated by State law, your response must be received at the earliest possible date, but not later than 30 days after receipt of this notice.

Please send your response to Kathy Pfeifer, case planner, at the address shown above.

Date Received: July 2, 2018

Planner: Kathy Pfeifer

Division: Planning and Development

Telephone: (805) 568-2507

cc: Clerk of the Board (please post for 30 days)
Encl: Project Overview and Scope of Analysis

PROJECT OVERVIEW AND SCOPE OF ANALYSIS

A. APPLICANT

BayWa r.e.
Strauss Wind, LLC
4365 Executive Drive, Suite 1470
San Diego, CA 92121
(858) 450-6800

B. LOCATION

The Strauss Wind Energy Project (Project) would be located on approximately 3,084 acres of rural, agriculturally zoned land, southwest of the City of Lompoc. The Project crosses a number of parcels (see Table 1 below).

Table 1 – Project Landowners/APNs

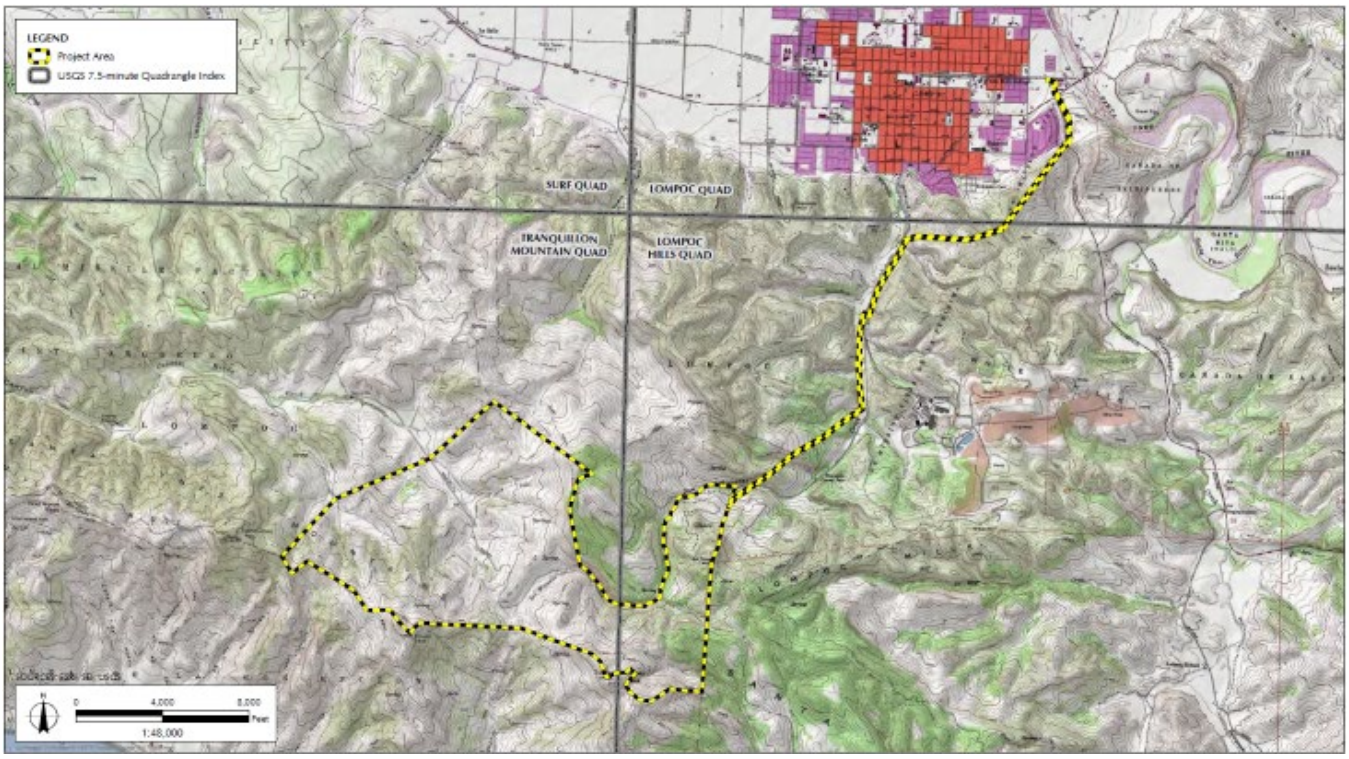
Property Owners	Assessor Parcel Numbers (APN)
Signorelli Family Trust: Joe and Sylvia Signorelli, Trustees	083-100-008, 083-250-011, 083-250-016, and 083-250-019
Gerald and Sandra Scolari Revocable Trust: Gerald and Sandra Scolari, Trustees; Rosabel V. Cameron Trust: Rosabel V. Cameron, Trustee and LeRoy Scolari	083-090-001 and 083-090-002
Adam Signorelli Trust: Adam Signorelli, Trustee	083-090-003
Alphonso Scolari Revocable Trust: LeRoy Scolari and Gerald Scolari, Trustees	083-080-004
Joanna M. Signorelli Trust: Joanna Signorelli, Trustee	083-100-007
John Christian Larsen Family Trust: John C. Larsen, Trustee	083-100-004
Joseph A. Signorelli, Jr. and Gus Tom Signorelli	083-090-004
Transmission Line Property Owners	**Assessor Parcel Numbers (APN)**
Celite Corp (Imerys Minerals California, Inc. subsidiary of Imerys Filtration Minerals, Inc.)	083-010-052, 083-010-055, 083-010-056, 083-010-057, 083-010-059, 083-030-005, 083-030-006, 083-030-011, 083-030-012, 083-030-031, 083-030-035, 083-030-043, 083-050-001, 083-040-005, 083-050-001, 083-060-013, 083-060-017, 083-070-021, 083-110-004, 083-110-006, 083-110-007, 083-110-008, 083-110-010, 083-110-012, 083-120-009, 083-120-008, 083-120-005, 08-120-010, 083-120-011, 093-120-019, 093-140-016
Morales Living Trust	083-030-027
Leonard Ross & Deanna Pini	083-030-057
Dewayne & Bonnie Holmdahl	083-030-060, 083-030-061

Lompoc Valley Trucking Co., Inc.	083-060-017
Bratz Family LLC, Johnson Family Trust, Linda McCaffrey Donelson Trust	083-110-002
Danbranbriya Family Trust	083-110-003
Coastal River Terrace, LLC	099-141-021
Santa Rita Hills Wine Center Investors, LP	099-141-034
Southern Pacific Railroad	099-520-006
Pacific Gas & Electric Company	099-520-013, 099-520-015

The majority of the proposed Project is in the 3rd Supervisorial District. The northern section of the proposed transmission line enters the 4th Supervisorial District boundaries and terminates in the City of Lompoc. See the Project's Vicinity Map (Figure 1) and Regional Map (Figure 2) below.

FIGURE 1: VICINITY MAP

FIGURE 2: REGIONAL MAP



C. REQUEST/DESCRIPTION

Strauss Wind, LLC (applicant) is proposing to develop, construct, and operate a utility-scale wind energy project that would produce up to 102 megawatts of electric power on approximately 3,084 acres of rural, agriculturally zoned land, southwest of the City of Lompoc. The Strauss Wind Energy Project (Project) is broadly similar to the Lompoc Wind Energy Project (LWEP), which was proposed at the same site and approved by the County in 2009. However, the LWEP was never built and subsequently sold to the applicant. Below lists the major components of the proposed Project and lists the differences between the LWEP and the proposed Project.

Proposed Project's Major Components:

- Construction and operation of up to 30 Wind Turbine Generators (WTGs), including:
  - 6 - 1.79 MW WTGs, 427 feet tall from foundation to blade tip, and
  - 24 - 3.8 MW WTGs, 492 feet tall from foundation to blade tip.
- 14.3 miles of new access roads and widening of 16.1 miles of existing non-County roads at the wind farm site and along the transmission line.
- Modifications, including widening of certain sections, to San Miguelito Road (a County road) to permit transport of 213-foot long WTG blades.
- Communication system and meteorological towers.
- Onsite electrical collection lines and onsite Project substation.

- Operations and maintenance building.
- 8.6-mile, 115-kilovolt (kV) transmission line from onsite substation to Pacific Gas & Electric (PG&E) Cabrillo Substation in Lompoc, and upgrades to the PG&E substation for interconnection.

Major Differences Between Proposed Project and LWEP:

- size, number and locations of WTGs (Project's WTGs are larger and more powerful than those proposed in LWEP, but there are 35 less WTGs).
- layout of access roads and other Project components.
- grading volumes.
- temporary and permanent ground disturbance.
- grading in the Coastal Zone (for the Project, but not included in the LWEP).
- substantial modifications to San Miguelito Road (for the Project, but not included in the LWEP).
- route of the northern section of the proposed 115 kV transmission line (Project does not follow the "environmentally superior alternative" route approved for the LWEP (see LWEP EIR Sec. 5.4.)).

For a more detailed Project description go to Project Details/Project Description at: http://sbcountyplanning.org/energy/projects/StraussWind.asp and see Project Site Plan in Attachment A.

The Project is subject to the Santa Barbara County Land Use and Development Code. The Project includes applications for a Conditional Use Permit (CUP) for the proposed facilities, a Variance for reduced property line setbacks for WTGs, and a Coastal Development Permit (CDP) for grading of access roads within the Coastal Zone (CZ). The portion within the CZ would be subject to the Coastal Zoning Ordinance.

D. EXISTING CONDITIONS

The proposed Project is located in a rural area of the County on ridges and valleys of the Santa Ynez Mountains along the coast between Jalama Beach and Point Arguello. The Project is mostly in the inland zone of the County; grading of access roads in the southern Project boundary is within the Coastal Zone. The Project area is bounded by Vandenberg Air Force Base (VAFB) on the south and west sides and private property on the north and east sides. The location is approximately 3-5 miles south and slightly west of the City of Lompoc and 2-3 miles north of the coast (See Figures 1 and 2 above). The Project is accessed via San Miguelito Road, a public road that winds through the Project area and dead-ends at the VAFB property line at the northwest edge of the Project.

The Project area, excluding the transmission line, comprises 11 parcels covering approximately 2,988 acres (see Table 1 above). The properties are zoned for agriculture (AG-II-100) and all are under Williamson Act agricultural preserve contracts. The principal use of the land is cattle grazing. Single family residences or mobile homes and agricultural accessory structures are located on most of the parcels. Historically, rock quarrying occurred in the area.

The corridor and access roads associated with the 8.3-mile 115-kV transmission line from the onsite substation to PG&E's Cabrillo Substation in Lompoc comprises 43 parcels covering approximately 96

acres (see Table 1 above). The route traverses several agricultural properties to reach San Miguelito Road, follows the road north then heads east and north to the interconnect location just inside the Lompoc city limit. Most of the land area along the proposed route is agricultural, with a section along the Imerys Filtration Minerals's rock mining quarry. There are also many residences near the route along San Miguelito Road and in the City of Lompoc.

Other structures and uses in the Project vicinity include the VAFB's Sudden Peak Tracking Station near the southern perimeter and Frick Springs, a City of Lompoc water facility on San Miguelito Road adjacent to the west side of the Larsen Property, and the Imerys rock mining quarry.
The terrain includes rolling hills and rugged, steeper slopes. The southern boundary with VAFB follows the ridgeline for much of its length. Prevailing winds from the northwest regularly flow over these ridges. Some of the prime wind sites in the southern Project area are near the VAFB property line.

The area is semi-arid, with annual rainfall of 20 inches at the higher elevations. The Project area drains into Hondo and Miguelito Creeks. Minor drainage channels feeding into those creeks are found throughout the area. Groundwater resources are limited. Low-volume producing wells provide ranchers with a minimal water supply for domestic use and cattle grazing operations. Site photos below show the Project area landscape and terrain.

Grasslands are the most extensive broad vegetation type on the site, maintained by grazing. Several types of grassland are present, including annual and native perennial grasses. Coastal scrub is most common on the steeper slopes, with high coverages in some areas. Evergreen forest species (coast live oak, tanoak) are found on north-facing slopes, ravines and drainages, and eucalyptus groves are present in some areas. Freshwater seeps and springs support the growth of willows and riparian vegetation in some areas. Gaviota tarplant, a federally listed, endangered species, is known to occur in the Project area. The southeastern corner of the Project area is within the designated critical habitat of the California red-legged frog, a federally listed, threatened species. Biological and archeological surveys of the Project area, as well as an environmental setting and analysis discussion, containing applicant proposed mitigation measures have been prepared by the applicant and are included in the Project application as part of the Project description.

Photo 1: Looking West at Intersection of San Miguelito Canyon Road and Sudden Road

Photo 2: West End of Scolari Ridge at VAFB Looking Northeast to North Ridge

E. OBJECTIVES

The objective of this process is to prepare a Supplement to the LWEP EIR (SEIR) under the California Environmental Quality Act (CEQA) to meet the legal requirements of a complete, adequate, and objective report of the proposed Project's potential environmental consequences. The SEIR will serve as an informational document for the public as well as County of Santa Barbara and State of California agencies. The County will have the responsibility of considering certification of the final environmental document. The process will culminate with hearings before the Santa Barbara County Planning Commission to make permitting decisions on the proposed Project.

F. NECESSARY ENVIRONMENTAL ANALYSIS

The SEIR must document the current baseline setting of the Project area and proposed transmission line. The analysis must consider impacts to the environment resulting from all Project components, including the WTGs, new roads and changes to existing roads, stream crossings, permanent meteorological towers, maintenance building, water well or other source of water, sewage effluent disposal system, underground and aboveground 35kV onsite electrical lines, onsite electrical substation, 115 kV electrical transmission line to Lompoc, and upgrades to PG&E's electrical system network. The analysis will need to encompass the construction and operational phases of the Project, which may continue in operation for 20 to 30 years or more, and any reasonably foreseeable environmental effects of future decommissioning of the wind farm.

The final locations of individual WTGs would be subject to minor adjustment known as micro siting, which refers to the precise placement of wind turbines and associated Project components during construction to optimize power production, constructability, or site efficiency and minimize site impacts to the extent feasible. The siting of turbines is based on the collection of wind speed data for over 10 years at selected locations and elevations throughout the site. In addition to determining the optimum location for WTGs to maximize wind resource and power production, micro-siting also is employed for both WTGs and other Project components to avoid environmental constraints such as archaeological sites, biologically

sensitive areas and geotechnical factors.

For purposes of analyzing potential adverse effects of the Project on each resource type, a worst-case configuration will be evaluated (i.e., the configuration with the greatest adverse effects to the resource being evaluated). The worst-case configuration may vary depending on which resource is being evaluated. For instance, locating turbines further down on steep slopes may reduce visual/aesthetic impacts while increasing grading-related impacts.

G. ENVIRONMENTAL ISSUES

This section provides a brief summary of the results of the environmental analysis prepared in the LWEP EIR and technical reports that have been prepared by Straus in support of their CUP application. This section also describes anticipated differences in the tasks and level of effort needed for preparation of the different issue areas of the SEIR. The following discussion is not intended to be comprehensive.

Aesthetics / Visual Resources

The LWEP EIR identified significant, unavoidable visual impacts from the WTGs, as viewed from Jalama Beach, Miguelito County Park (and adjacent County road), and upper San Miguelito Road. The LWEP EIR also identified significant impacts from the 115 kV transmission line silhouetted along the ridgeline above Highway 1, an officially designated State Scenic Highway. However, the Alternatives analysis identified an Environmentally Superior Alternative route that would reduce impacts to less than significant. This alternative route was included in the approved LWEP CUP.

The proposed Project involves 35 fewer WTGs. However, the proposed Project could alter the visual character of the area and could potentially be considered aesthetically offensive or incompatible with the landscape. For aviation safety, some of the towers would need to be equipped with night lighting as determined by the Federal Aviation Administration (FAA), which could impact nighttime views of the southern skyline from across the Lompoc Valley.

Both close-range and distant views could be affected. Relatively few people would see the turbines at close range, due to the somewhat remote location, hilly terrain, and lack of any public destination in the last few miles of San Miguelito Road. However, the turbines would dominate the landscape for those who did see them close-up. The proposed operations and maintenance facility (O&M facility), substation, and other onsite facilities would also create some visual impacts as seen from San Miguelito Road. Affected public would include sight-seers, naturalists, cyclists and others who venture out to the end of San Miguelito Road.

Some turbines might be visible from parts of Lompoc, although many views would be blocked by the intervening hills. At distances of five to ten miles, turbines could be visible from the Lompoc Valley, Vandenberg Village, and possibly Jalama beach or other sites. At these distances, the turbines might be visually subordinate to the landscape, or might stand out enough to be considered visually significant or intrusive.

A portion of the Project's transmission line follows the previously approved environmentally superior LWEP route; however, the northern section of the route deviates from this route. As proposed, the Project's transmission line would be visible along Highway 1 (a designated Scenic Highway) approaching the Lompoc City limit, and a section of it would also run along San Miguelito Road.

A Visual Resources Technical Report (VRTR) for the Project has been prepared by Strauss. The Project SEIR will analyze visual impacts from the proposed Project and identify appropriate mitigation measures. In addition, alternative routes for the 115 kV transmission line will be evaluated to help minimize visual impacts of the transmission line.

Agriculture and Forestry Resources

The LWEP EIR determined that the LWEP would result in no impacts to four of the five impact areas for agriculture and forestry resources, with less than significant impacts regarding conflict with existing zoning for agricultural use, or Williamson Act contracts. The Project is anticipated to result in less than significant impacts, as the total disturbed acres is anticipated to be less than that of the LWEP.

Air Quality

The LWEP EIR analyzed impacts to air quality with regard to short-term construction NOx and ROC, short-term construction PM_{10} emissions, and long-term emissions. Construction emissions would be less than significant for NOx and ROC, but potentially significant for PM_{10} due to dust generated from ground disturbance, travel on unpaved roads, mobile exhaust, and concrete batch plant emissions.

An Air Quality and Greenhouse Gas Emissions Technical Report for the Project has been prepared by Strauss. It concludes that the Project would result in no impacts or less than significant impacts from conflicts with an applicable air quality plan, violation of air quality standards during operation, cumulatively considerable net increase of any criteria pollutant, exposing sensitive receptors to substantial pollutant concentrations, or creating objectionable odors. The Report concludes that PM_{10} emissions are significant but would be mitigated to below the level of significance with dust mitigation measures and fuel efficiency standards for construction equipment.

Biological Resources

The LWEP EIR determined that the LWEP would result in significant impacts to biological resources related to five of the six thresholds articulated in Appendix G of the California CEQA Guidelines: federally or State-listed rare, threatened, and endangered species; State-designated sensitive plant communities, including riparian habitats; federally protected wetlands; wildlife movement corridors; and potential conflicts with local policies and ordinances. With respect to the proposed Project, most of these impacts would be reduced to below the level of significance with the mitigation measures detailed in the LWEP EIR. However, *Impact BIO-10: Avian and Bat Collisions with WTGs*, was determined to be a significant, unmitigable impact. Six mitigation measures were written to reduce the impacts, and additional measures were included in the modifications to the LWEP EIR prior to its certification.

A Biological Resources Technical Report (BRTR) and a Transportation Study for San Miguelito Road (which describes impacts to widening the road) have been prepared by the applicant for the proposed Project. The SEIR will analyze temporary direct impacts (e.g., loss of wildlife and plant individuals, loss or alteration of habitat) and indirect impacts (e.g., noise, human activity resulting in habitat avoidance by wildlife, night lighting, introduction and spread of weeds) associated with Project's construction and widening of dirt/gravel roads, WTGs, power and transmission lines, and other proposed facilities. Of special note are anticipated impacts to federal and state listed, endangered species, such as Gaviota tarplant, native grasslands, Sawtooth goldenbrush, oak trees, and California red-legged frog.

Direct adverse impacts during Project operation would include collisions of birds and bats with turbines, power/transmission poles and power/transmission lines. Indirect effects on habitat would include increased human activity, noise, night lighting, dust, and spread of weeds.

Cultural Resources

The Project location includes archeological sites, some of which have potentially high significance. The LWEP EIR determined that the LWEP would result in less than significant impacts after implementation of mitigation measures. Although the LWEP EIR did not evaluate possible disturbance to human remains, the County's archaeological consultant states that the probability for such impacts are considered to be very low based on the results of earlier Phase 1 Investigations for the Project.

A Cultural Resources Technical Report (CRTR) has been prepared for the Project and determined that the Project would result in potentially significant impacts to cultural resources. Mitigation measures that could minimize archeological impacts and potentially reduce them to less than significant levels include: conducting pre-construction workshops, avoiding known sites, additional surveying where site avoidance is infeasible, capping roads with soil or gravel to isolate cultural deposits, monitoring excavation by a County-approved archeologist and a Native American Monitor, and suspending work if potentially important cultural materials or human remains are discovered.

Tribal Cultural Resources

The LWEP EIR did not include a separate analysis of tribal cultural resources, as it was not required by CEQA at the time. The CRTR determined that the Project would result in less than significant direct impacts after implementation of mitigation measures regarding both of the questions listed in Appendix G of the State CEQA Guidelines.

The Project CRTR states tribal cultural resources could potentially result in significant impacts, but can be reduced to a level of insignificance with mitigation measures listed above. The SEIR analysis will determine whether the Project may adversely affect tribal cultural resources.

Energy

The LWEP EIR determined that the LWEP would result in a beneficial effect to energy, as the Project would generate a substantial amount of renewable electricity in support of federal and State renewable energy goals. The energy would have been sold to Pacific Gas and Electricity under a power purchase agreement (PPA). The impact to energy was classified as a Class IV, beneficial impact.

The proposed Project would generate similar amounts of renewable energy as the LWEP, and by Strauss' estimate would provide enough power for 44,700 homes. The Project currently has an Interconnection Agreement with PG&E. The SEIR will analyze and determine whether the Project is expected to result in similar impacts to Energy Resources as the LWEP.

Fire Hazards and Emergency Services

The LWEP EIR found that impacts on fire hazards and emergency services would be reduced to less than significant, through implementation of several mitigation measures, including an applicant-proposed fire protection plan. Impacts to Fire Hazards and Emergency Services will be reviewed to verify that differences between the LWEP and the Project or changes in environmental or regulatory setting would not materially alter the analysis or conclusions of the LWEP EIR.

Geology and Soils

The LWEP EIR determined that the LWEP would not result in impacts regarding the significant loss of availability of a known mineral resource that would be of value to the region or the residents of the state or the significant loss of availability of a locally important mineral resource recovery site delineated in local general plans. The LWEP would result in potential impacts to geology and soils, and as a result, four mitigation measures were adopted to mitigate these impacts.

A Geologic and Soils Technical Background Report and Geotechnical Evaluation were prepared by Strauss to update the previous Geotechnical Report prepared in 2011 for LWEP. The Project involves substantial grading for roads and WTG foundations, which in some cases would be on steep slopes. Some existing roads would need to be temporarily widened to a width of 40 feet during construction, to accommodate large cranes. Following construction, roads would be restored to widths of 16-22 feet. Grading volumes are estimated at 665,025 cubic yards cut and 623,025 cubic yards fill. Potentially significant impacts include erosion, slope failure, and topsoil loss. Minor seismic faults are present in the Project vicinity, raising the possibility of turbine structural failure during earthquakes. The report contains specific recommendations and mitigation measures that will reduce impacts to geology and soils to less-than-significant levels.

In addition, a Transportation Study was conducted for the Project in November 2017 that focused on San Miguelito Road. The study recommended engineered plans, including geotechnical evaluation, and stormwater erosion control measures/BMPs for modifications of San Miguelito Road.

The SEIR will identify any geologic hazards that could have a significant impact on the proposed project. The SEIR will also assess the potential geologic, soil erosion, and sedimentation impacts associated with grading for the purposed Project and as necessary, identify feasible mitigation measures.

Greenhouse Gas Emissions

The LWEP EIR did not include analysis of greenhouse gas emissions, as it was not required by CEQA at the time.

The Air Quality and Greenhouse Gas Emissions Technical Report (GHG Report) prepared for Strauss for the Project analyzed GHG emissions quantitatively and qualitatively. The GHG Report concludes that the Project would result in a net benefit to GHG emissions during operation, and that construction emissions would be less than significant. It concludes that the Project would have a less than significant impact to generating greenhouse gases and would not conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing GHG emissions.

Air quality and GHG thresholds of significance established by the County Board of Supervisors and shown in the Environmental Thresholds and Guidelines Manual (revised July 2015) will be presented and followed. These significance criteria will include criteria pollutant quantitative thresholds and a bright-line GHG threshold of 1,000 metric tons of carbon dioxide equivalent per year.

Hazards and Hazardous Materials

The LWEP EIR determined that the LWEP would result in potentially significant impacts to risks from tower failure and blade throw along San Miguelito Road, blade icing and ice throw, electromagnetic field effect, utility/turbine interface and worker safety, release of hazardous materials from WTGs and ancillary facilities. As a result, five mitigation measures were adopted to mitigate these impacts to a less than significant level. The five mitigation measures included preparation of a Hazardous Materials Management Plan, signage to follow in case of a spill while refueling vehicles, designated area for refueling construction equipment, proper maintenance of vehicles, and setbacks of WTGs from public roadways. The Project would be expected to have similar impacts to hazards and hazardous materials as those evaluated in the LWEP EIR.

A Phase I Environmental Site Assessment (ESA) was prepared for the Project; it determined that there were no hazardous materials sites located within the Project area.

Hydrology/Water Quality

The Water Resources section of the LWEP EIR determined that the LWEP would result in significant impacts regarding flood hazards, water quality, groundwater, drainage and stormwater runoff. Mitigation measures were identified to mitigate those impacts to an insignificant level.

The proposed Project is situated on the hills and ridges that drain into Hondo and Miguelito Creeks. Project roads will cross the upper reaches of Hondo Creek and several minor drainage channels. Construction of roads and WTG foundations may increase surface runoff and siltation.

A Hydrologic Impact Assessment (HIA) was prepared for the Project in November 2017. The HIA determined that the Project would result in similar impacts to those identified in the LWEP EIR and recommended six mitigation measures. With mitigation measures and the implementation of industry standard BMPs impacts to hydrology and water quality are expected to be less than significant.

The modifications to San Miguelito Road and the proposed transmission line and associated access roads are not within the scope of the HIA. Therefore, the EIR will assess impacts in these areas, and recommend mitigation measures need to be identified to mitigate any new impacts.

Due to limited on-site water resources, the water required during construction would be obtained from Lompoc Regional Wastewater Reclamation Plant. During the Project operational phase, a new water well is proposed to provide the small amount of water needed at the O&M facility, estimated to be 250 gallons per day. A sewage effluent system is proposed near the O&M facility. A Preliminary Well Assessment and a Percolation Study were prepared for the Project.

Land Use and Planning

The LWEP EIR determined that the LWEP would result in less than significant impacts to all of the impact areas regarding land use and planning. The Project would be anticipated to result in the same or similar impacts to land use and planning as the LWEP.

Noise

The LWEP EIR determined that the LWEP would result in potentially significant noise impacts to nearby residents. Nine mitigation measures were adopted to mitigate these impacts.

An Environmental Noise Analysis was prepared for the Project in April 2017, and updated in January 2018, to reflect changes to the turbine and access road layout. The noise technical report determined that all noise impacts, short-term construction and long-term operational, would be less than significant. The nine LWEP EIR noise mitigation measures will be reanalyzed for the Project.

Paleontological Resources

The LWEP EIR determined that the LWEP would result in potentially significant impacts to Paleontological Resources due to ground-disturbing activities and unauthorized collection of fossils. Three mitigation measures were adopted to mitigate these impacts.

San Miguelito Road and the transmission line route have the potential to impact Paleontological Resources and will be analyzed during preparation of the EIR.

Population and Housing

The LWEP EIR determined that the LWEP would result in no impact to population and housing. It is anticipated that between 50 and 100 construction workers would reside temporarily in the surrounding

area during construction of the Project, as would a limited number of permanent employees who would operate the facilities. As stated in the LWEP EIR, the Project would not directly require the construction of new housing nor would it displace people from their current living situations. The Project would be anticipated to result in the same or similar impacts to population and housing as the LWEP.

Public Services

The LWEP EIR determined that the LWEP would result in no population-based impacts to public services such as police protection, schools and parks; no new or altered facilities would be required to maintain acceptable service ratios, response times, or other performance objectives. The LWEP was determined to result in less than significant impacts after implementation of mitigation measures regarding fire protection services and emergency response services, due to the Project's location within an Extreme Fire Hazard Area and restricted public access to the remote Project site. The Project would be anticipated to result in the same or similar impacts to public services as the LWEP.

Recreation

The LWEP EIR determined that the LWEP would result in no adverse impacts regarding increasing the use of existing neighborhood and regional parks, requiring the expansion of recreational facilities, or possible loss of recreational opportunities on Sudden Road and a section of San Miguelito Road.
The Project would be anticipated to result in similar impacts to recreation as the LWEP. However, the SEIR will analyze the impacts of the proposed modifications of San Miguelito Road as they relate to recreational activities.

Transportation/Traffic

The LWEP EIR analyzed traffic impacts during construction, as operational traffic was assumed to be minimal. Traffic impacts to level of service, heavy-haul delivery routes, and erosion on roadways were found to be less than significant. Short term impacts to safety due to the use of oversized trucks and damage to roadways would be significant, but mitigable. Mitigation measures were included for a traffic management plan and traffic mitigation fees with additional measures to protect roadways.

A Transportation Study was conducted for the Project in November 2017 to investigate the movement of wind turbine components and to identify critical improvements needed to accommodate their delivery to each WTG location. A secondary study was conducted in November 2017 focused on San Miguelito Road. The study recommended engineered plans, including geotechnical evaluation, traffic control plan, and stormwater erosion control measures/BMPs for modifications of San Miguelito Road. The transportation-related impacts are expected to be substantially greater for the Project than for the LWEP, due mainly to the much larger dimensions of the WTG blades that will be transported. Appropriate mitigation measures will be developed.

Utilities/Service Systems

The LWEP EIR determined that the LWEP would result in less than significant impacts regarding: wastewater treatment requirement, new water or wastewater treatment facilities, storm water drainage, water supplies, wastewater treatment, landfills and solid waste. No mitigation measures were required. The Project would be anticipated to result in the same or similar impacts to utilities and service systems as the LWEP. The County's Environmental Health Services (EHS) has reviewed both the Project's proposed onsite wastewater treatment system and domestic water well and states they are not feasible systems. The applicant is currently working with EHS, and the SEIR will analyze the systems feasibility.

Project Alternatives

As required by Section 15126.6 of the State CEQA Guidelines, the SEIR will include a range of reasonable alternatives that have the potential to accomplish the basic objectives of the proposed Project while eliminating or reducing impacts to potentially significant impacts. Alternatives to be included in the SEIR will include a No Project Alternative; a Reduced Project Alternative; and other alternatives as appropriate. The alternatives proposed in the SEIR would use the alternatives described in the LWEP EIR as a starting point.

Cumulative Impacts

The SEIR will consider any other recently approved or planned projects in the area and disclose and analyze cumulative impacts.

Growth-inducing Impacts

The SEIR will consider whether the Project would have potential growth-inducing impacts.

H. ENVIRONMENTAL ANALYSES AND APPLICANT-PROPOSED MITIGATION MEASURES PROVIDED IN THE PROJECT APPLICATION

The Project application contains the following reports, which supplement and update the many studies and technical reports previously prepared for the LWEP (some of these reports are being revised by the applicant per County comments):

- Visual Resources Technical Report prepared by Sapphos Environmental, Inc. dated March 6, 2018;
- Air Quality and Greenhouse Gas Emissions Technical Report prepared by Sapphos Environmental, Inc. dated March 6, 2018 and a Memorandum with revised emission calculations prepared by Dudek, dated June 2018;
- Biological Resources Technical Report and Technical Appendices prepared by Sapphos Environmental, Inc. dated March 7, 2018;
- Cultural Resource Technical Report prepared by Sapphos Environmental, Inc. dated March 6, 2018;
- Draft Geotechnical Evaluation prepared by Ninyo & Moore Geotechnical and Environmental Sciences Consultants, dated April 27, 2017;
- Geologic and Soils Technical Background Report prepared by Wilson Geosciences Inc., dated December 2, 2016;
- Final Phase I Environmental Site Assessment prepared by Tetra Tech, Inc., dated December 23, 2016;
- Hydrologic Impact Assessment prepared by CWE, dated November 2017;
- Environmental Noise Analysis prepared by J.C. Brennan & Associates, Inc., dated February 28, 2018;
- Transportation Study prepared by ATS Projects Wind Energy Services, dated November 17, 2017;
- Percolation Study prepared by Earth Systems Pacific, dated November 3, 2017;
- Tree Removal Analysis/Inventory of Trees prepared by LAV//Pinnacle Engineering, dated November 21, 2017; and

- Preliminary Well Assessment prepared by Cleath-Harris Geologists, Inc., dated November 30, 2017.

The LWEP EIR adopted a number of mitigation measures to mitigate potentially significant impacts in various issue areas. All issue areas will be reviewed to ensure that differences between the LWEP and the Project or changes in environmental or regulatory settings will not materially alter the analysis or conclusions of the LWEP EIR. If new, significant impacts are discovered, they will be analyzed and appropriate mitigation measures will be developed. In addition, it will be necessary to describe and support any additions, modifications, or deletions of resource impacts or mitigation measures that were presented in the LWEP EIR (as modified before certification).

ATTACHMENT: A: Site Plan

State of California • Natural Resources Agency
Edmund G. Brown Jr., *Governor*
Department of Conservation
Division of Oil, Gas, and Geothermal Resources
Coastal District • Orcutt
195 South Broadway • Suite 101
Orcutt, CA 93455
(805) 937-7246 • FAX (805) 937-0673

July 18, 2018

Ms. Kathy Pfeifer, Planner
Santa Barbara County
Planning & Development
123 E. Anapamu Street
Santa Barbara, CA 93101

Dear Ms. Pfeifer:

SCH # 2018071002 STRAUSS WIND ENERGY PROJECT

The Division of Oil, Gas, and Geothermal Resources (Division) has reviewed the Notice of Preparation for the Strauss Wind Energy Project. The Division has no jurisdiction or statutory responsibility for the project. The Division is mandated by Section 3106 of the Public Resources Code to supervise the drilling, operation, maintenance, and abandonment of oil and gas wells. This is for the purposes of preventing: 1) damage to life, health, property, and natural resources; 2) damage to underground and surface waters suitable for irrigation or domestic use; 3) loss of oil, gas, or reservoir energy; and 4) damage to oil and gas deposits by infiltration of water and other causes.

The Division of Oil, Gas, and Geothermal Resources (Division) possesses records regarding oil and gas, and geothermal wells drilled and operated in the State of California. (Cal. Public Res. Code, §§ 3215, and 3126 and Cal. Code of Regulations §§ 1937.1, and 1950.) The Division provides the information below to facilitate local permitting agencies' exercise of local land use authority regarding use of land where oil and gas, and geothermal wells are situated. In contrast, the Division does not possess local land use decision authority, but alternatively has authority for permitting any necessary work on any well in the State. (Cal. Public Res. Code, §§ 3106 and 3203, and Cal. Code of Regulations §§1931, 1931.1, 1931.2, 1963, 1964 and 1981.)

The Division has record of four wells that are located within or in close proximity to the estimated project boundary and transmission corridor. Those wells are identified as oil and gas well Chieftan Oil Co. & Chieftan-Larsen Bros. "Chieftan Larsen Bros" 1 (API 08304335), Rothschild Oil Company "Sacramento-J.M." 1 and 2 (API 08304524 and 08302626), and Marathon Oil Company Well 1 (API 08304510). The following map shows the approximate location of the wells. Well records are available on our Division website (https://secure.conservation.ca.gov/WellSearch/). While the enclosed map shows the general well location, precise measurements are provided in the well histories found online. The oil and gas well may have been plugged to meet the standards applicable at the time, however may not meet current Division regulations.

In general, a well may be considered adequately abandoned when both the record review and on-site evaluation process reflect that steps have been taken to isolate all oil or gas-bearing, or geothermal bearing strata encountered in the well, and to protect underground or surface water suitable for irrigation or farm or domestic purposes from the infiltration or addition of any

detrimental substance, and to prevent damage to life, health, property, and other resources. (Cal. Public Res. Code, § 3208.)

The Division offers the following information as it pertains to wells within its jurisdiction:

1. It is recommended that access to any well located on a property be maintained in the event abandonment or re-abandonment of the well becomes necessary in the future. Impeding access to a well could result in the need to remove any structure or obstacle that prevents or impedes access. This includes, but is not limited to features such as buildings, housing, wind machines, pipelines, fencing, landscaping, trees, pools, patios, sidewalks, and decking. Maintaining sufficient access to an oil or gas well may be generally described as maintaining "rig access" to the well. Rig access allows a well servicing rig and associated necessary equipment to reach the well from a public street or access way, solely over the parcel on which the well is located. A well servicing rig, and any necessary equipment, should be able to pass unimpeded along and over the route, and should be able to access the well without disturbing the integrity of surrounding infrastructure.

2. Nothing guarantees that wells abandoned to current standards will not start leaking oil, gas, and/or water in the future. It always remains a possibility that any well may start to leak oil, gas, and/or water after abandonment, no matter how thoroughly the well was plugged and abandoned. The Division acknowledges wells that are presently abandoned to current standards have a lower probability of leaking oil, gas, and/or water in the future, but makes no guarantees as to the adequacy of the abandonment or the potential need for future re-abandonment.

3. While Division records indicate that the oil and gas well was never classified as commercially productive, the Division recommends that any soil containing significant amounts of hydrocarbons be disposed of in accordance with local, state, and federal laws. Please notify the appropriate authorities if soil containing significant amounts of hydrocarbons is discovered during development.

4. No well work may be performed on any geothermal or oil or gas well without written approval from the Division in the form of an appropriate permit. This includes, but is not limited to, mitigating leaking fluids or gas from abandoned wells, modifications to well casings, and/or any other re-abandonment work. (NOTE: The Division regulates the depth of any well below final grade (depth below the surface of the ground). Title 14, Section 1723.5 of the California Code of Regulations states that all well casings shall be cut off at least 5 feet but no more than 10 feet below grade. If any well needs to be lowered or raised (i.e. casing cut down or casing riser added) to meet this grade regulation, a permit from the Division is required before work can start.)

5. The Division has determined that the plugged oil and gas well in its current condition is not properly abandoned to current standards and requires additional work to be in compliance with current Division regulations and authority.

6. Activity consistent with oil development include construction of oil sumps, storage tanks, pipelines or other infrastructure, commonly associated with oil production, which may have impacted the site. Also, equipment attendant to oilfield operations may be encountered during excavation of the area around plugged wells.

7. If during development activities, any wells are encountered that were not part of this review, the City shall immediately notify an engineer with the Division's Coastal District Orcutt office. Remedial plugging and abandonment operations may be required. Additionally, a plot plan showing the location of the proposed pipeline relative to the well locations would be required.

8. The Division advises all parties not to undertake construction that could prevent or impede access to the well.

As Cal. Public Res. Code, § 3208.1, subdivision (b)(1), indicates, if the Strauss Wind Energy Project plans to construct improvements on the property that would prevent or impede access to the well(s), reentry of the well(s) for the purposes of upgrading the plugging and abandonment condition is the responsibility of the project applicant. This Division may order the plugging and abandonment of the well(s) and the Division is not responsible for abandonment operations.

Again, the Division does not recommend that any structures, such as wind machines or transmission lines be built that would impede access to the plugged and abandoned well. It is suggested that the wells be unearthed, their locations GPS and that information be supplied to the Division, and the wells be tested for leakage.

Should you have any questions regarding the wells during your planning process, please do not hesitate to contact our office.

Sincerely,

Patricia A. Abel
Coastal District Deputy

Enclosure

cc: Well File
State Clearinghouse
Tim Shular, OGER
Crina Chan, OGER
Jan Perez, CEQA Unit

MAP OF THE PROJECT AND SURROUNDING AREA

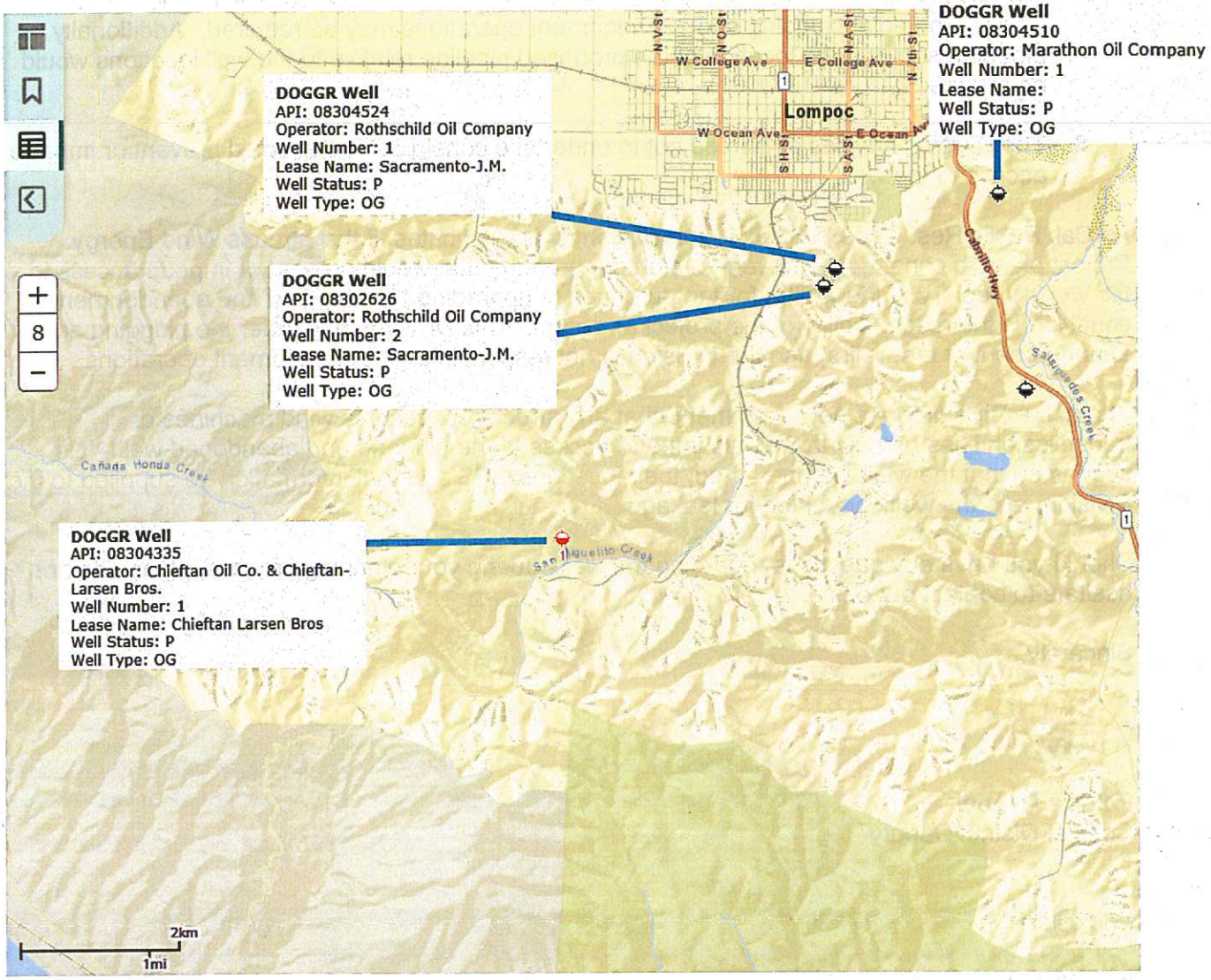


Image from the Division of Oil, Gas, and Geothermal Resources Online Well Finder application showing the proximity of plugged and abandoned exploratory oil and gas wells within or in close proximity to the Strauss Wind Energy Project

CITY OF
LOMPOC

July 27, 2018

Kathy Pfeifer, Planner
County of Santa Barbara
Planning and Development
Energy Division
123 East Anapamu Street
Santa Barbara, CA 93101

RE: Scoping Comments on the Notice of Preparation of a Draft Supplement to the Lompoc Wind Energy Project's Environmental Impact Report for the Strauss Wind Energy Project
Case#: 16CUP-00000-00031; 18CDP-00000-00001; and 18VAR-00000-00002

Dear Ms. Pfeifer:
Thank you for the opportunity to comment on the Draft Supplement to the Lompoc Wind Energy Project's Environmental Impact Report for the Strauss Wind Energy Project. The City of Lompoc has the following comments and requests the potential for environmental impacts, in areas identified in Attachment A, be evaluated.

In addition, to provide fair opportunity for comment on the proposed project by those who will be most affected, we request public hearings and meetings on the proposal continue to be held in Lompoc.

Thank you again for the opportunity to review the project proposal and comment on the scope of the environmental document.

Sincerely,

Teresa Gallavan, Interim City Manager
City of Lompoc

cc: Lompoc City Council
Lompoc Planning Commission
Kevin McCune, Public Works Director
Tikan Singh, Acting Utility Director and Electric Utility Manager
Brian Halvorson, Planning Manager

City of Lompoc LETTER OF COMMENT, SEIR Scoping, July 27, 2018

Electric

The City of Lompoc operates its own electric utility. The City wishes to ensure the proposed project will not impact its electric transmission routing and connection to the electric grid. Please include the following items in the scope of environmental review.

- Evaluate the potential for the proposed project to cause any degradation in the reliability of service on the local grid.
- Evaluate the potential for the project to be able to comply with City electric requirements within the vicinity of the City limits.
- Evaluate potential effects of the proposed project on power quality, reliability and availability and potential for effects on the City of Lompoc's Electric Distribution Grid or on the Local Region Transmission that delivers power to the City of Lompoc Receiving Station.
- Evaluate the ability of the proposed project to abide by "Good Utility Practice" as set forward under the California Independent System Operator Corporation including those practices required by Federal Power Act Section 215.
- Evaluate the proposed project's ability not to alter, modify, negatively affect or disturb existing City of Lompoc Electric underground or overhead infrastructure during construction, installation or modification of any new elements needed to interconnect the Strauss Wind Energy Project.

Transportation

- Evaluate the potential for project impacts of construction and transport of materials (weight) on local roadway maintenance requirements? (246/Ocean Avenue, I Street)

Aesthetic Impacts

- Evaluate impacts on viewsheds from Miguelito Canyon Road, Highway 1 north of Lompoc, and from the Lompoc valley.

Emergency Services

- Evaluate the emergency communication needs of the proposed project, including cellular, telephone and radio communications through Miguelito Canyon. Evaluate the need for dedicated repeaters for emergency services.
- Evaluate the impacts of a vegetation management program, including fire clearance around any transmission areas, electrical lines, transfer stations, and other potential ignition sources.
- Evaluate ingress and egress needs for emergency vehicles including turn arounds, width, compaction, gates and bridges.
- Evaluate the potential need for fuel breaks including around critical infrastructure.
- Evaluate the area's very high fire hazard designation and the potential needs to harden structures or equipment areas.

Noise Impacts

- Evaluate the potential project impacts of noise and vibration from the wind turbines on humans, structures and wildlife.

Facility Decommissioning

- Evaluate potential foreseeable impacts of decommissioning of the facilities at the end of its useful life.

Biological Impacts

- Evaluate the potential of the proposed project to impact the populations of Red-legged frog and Southern California Steelhead known to occur in San Miguelito Creek in the vicinity of Frick Springs. (Piedra 05) Evaluate potential impacts on area special status plants, including Bolander's Phacelia. Potential for mpacts to wetlands and agricultural wetlands to be evaluated, along with bird and bat strike impacts, especially addressing the California Condor.

Grading Impacts

- Evaluate the impacts of the proposed project on cut and fill on San Miguelito Canyon Road necessary to transport the windmill parts and equipment up the canyon to the project site. Evaluation should also include potential for impacts to adjacent homes, septic systems, water, sewer, gas and electric lines, San Miguelito Creek and its special status species.
- Evaluate the impact of potential truck trips to remove export from the site.

Water Impacts

Part of the City of Lompoc municipal water system is the Frick Springs system. It is adjacent to the road to the proposed Project, in the Miguelito canyon, about 5 miles south of the City limits. The Frick Springs system collects naturally occurring mountain flows from an area of approximately 190 acres, below, and in the near vicinity of the proposed Project. The collected water is treated at a small water treatment facility on the west side of road, and runs into the City of Lompoc through a pipeline routed along the Creek.

- Evaluate the potential project impact of road widening on the City of Lompoc's Frick Springs Water Treatment Facility and its accesses, along with the adjacent San Miguelito Creek Channel. Additionally, evaluate the potential for project impacts to the canyon reservoir and associated delivery systems, water lines, and facilities.
- Evaluate the water supply requirements of the proposed project and the availability of the required water, and potential for impacts on other wells if the proposed source is well water.

July 30, 2018

Kathy Pfeifer
Santa Barbara County
Planning & Development
123 East Anapamu Street
Santa Barbara, CA 93101

Re: APCD Response to Notice of Preparation of a Draft Supplement to the Lompoc Wind Energy Project Environmental Impact Report for the Strauss Wind Energy Project, 16CUP-00000-00031, 18CDP-00000-00001, 18VAR-00000-00002

Dear Ms. Pfeifer:

The Santa Barbara County Air Pollution Control District (APCD) appreciates the opportunity to provide comments on the Notice of Preparation (NOP) of a Draft Supplement to the Lompoc Wind Energy Project Environmental Impact Report (SEIR) for the Strauss Wind Energy Project. The Strauss Wind, LLC proposes to develop, construct, and operate a utility-scale wind energy project that would produce up to 102 megawatts of electric power. The project is broadly similar to the Lompoc Wind Energy Project, which was never built and subsequently sold to the applicant. The project's main components are as follows: construction and operation of up to 30 wind turbine generators (WTGs), 14.3 miles of new access roads and widening of 16.1 miles of existing non-County roads at the wind farm site and along the transmission line, modifications to San Miguelito Road, communications system and meteorological towers, onsite electrical collection lines and onsite project substation, operations and maintenance building, 8.6 miles, 115-kilvolt transmission line from onsite substation to PG&E Cabrillo Substation in Lompoc, and upgrades to the PG&E substation for interconnection. The project will be located on approximately 3,084 acres of rural, agriculturally zoned land, southwest of the City of Lompoc.

APCD staff reviewed the *Project Overview and Scoping of Analysis* attached with the NOP of a Draft SEIR, which indicates that air quality impacts are less than significant with mitigation. APCD staff offers the following comments on the *Scope of Analysis* and considerations for the preparation of the Draft SEIR:

Construction Impacts: The proposed project will involve a substantial amount of construction activity. The *Scope of Analysis* states that the project's Air Quality and Greenhouse Gas Technical Report (Report) concludes that PM_{10} emissions are significant but mitigable to a less than significant level with dust mitigation and fuel efficiency standards for construction equipment. The Report also shows that unmitigated emissions of **NOx** are significant, but mitigable to a less than significant level with requirement that construction engines are rated Tier 3 or higher. Please ensure the Draft SEIR contains adequate mitigation measures to reduce potentially significant impacts from the project's **PM_{10} and NOx emissions**. APCD's June, 2017 *Scope and Content* document, Section 6, presents recommended mitigation measures for fugitive dust and equipment exhaust emissions associated with construction projects. Construction mitigation measures should be enforced as conditions of approval for the project. The SEIR should include a Mitigation Monitoring and Reporting Plan that explicitly states the required mitigation and establishes a mechanism for enforcement.

APCD Permitting Advisory: If the portable concrete batch plants (and associated engines, if any) will be present at the project site for more than 12 months they will need to be permitted by the APCD even if they are registered in the State's Portable Equipment Registration Program.

We hope you find our comments useful. We look forward to reviewing the Draft EIR. Please contact me at 961-8890 or by e-mail at BarhamC@sbcapcd.org if you have questions.

Sincerely,

Carly Barham

Carly Barham
Planning Division

cc: Chron File

State of California – Natural Resources Agency
DEPARTMENT OF FISH AND WILDLIFE
South Coast Region
3883 Ruffin Road
San Diego, CA 82123
(858) 467-4201
www.wildlife.ca.gov

EDMUND G. BROWN, Jr., Governor
CHARLTON H. BONHAM, Director

August 3, 2018

Kathy Pfeifer
Santa Barbara County
Planning and Development
123 E. Anapamu Street
Santa Barbara, CA 93101
805-568-2507
Kathypm@co.santa-barbara.ca.us

Notice of Preparation of a Draft Supplement to the Lompoc Wind Energy Project Environmental Impact Report for the Strauss Wind Energy Project, County of Santa Barbara, SCH#2018071002

Dear Ms. Pfeifer:

The California Department of Fish and Wildlife (CDFW or Department) has reviewed the above-referenced for Notice of Preparation (NOP) of a Draft Supplement to the Lompoc Wind Energy Project Environmental Impact Report (EIR) for the Strauss Wind Energy Project (Project). The NOP's supporting documentation includes the *Lompoc Wind Energy Project Final Environmental Impact Report (LWEP FEIR) and Strauss Wind Energy Project Conditional Use Application Tab G: Project Description (Sapphos Env. Inc., April 2018).*

Thank you for the opportunity to provide comments and recommendations regarding those activities involved in the Project that may affect California fish and wildlife. Likewise, we appreciate the opportunity to provide comments regarding those aspects of the Project that CDFW, by law, may be required to carry out or approve through the exercise of its own regulatory authority under the Fish and Game Code.

CDFW's Role

CDFW is California's Trustee Agency for fish and wildlife resources, and holds those resources in trust by statute for all the people of the State. [Fish & Game Code, §§ 711.7, subdivision (a) & 1802; Public Resources Code, § 21070; CEQA Guidelines § 15386, subdivision (a)]. CDFW, in its trustee capacity, has jurisdiction over the conservation, protection, and management of fish, wildlife, native plants, and habitat necessary for biologically sustainable populations of those species (Id., § 1802). Similarly, for purposes of CEQA, CDFW is charged by law to provide, as available, biological expertise during public agency environmental review efforts, focusing specifically on projects and related activities that have the potential to adversely affect state fish and wildlife resources.

CDFW is also submitting comments as a Responsible Agency under CEQA (Public Resources Code, § 21069; CEQA Guidelines, § 15381). CDFW expects that it may need to exercise regulatory authority as provided by the Fish and Game Code, including lake and streambed alteration regulatory authority (Fish & Game Code, § 1600 *et seq.*). Likewise, to the extent implementation of the Project as proposed may result in "take", as defined by State law, of any

species protected under the California Endangered Species Act (CESA) (Fish & Game Code, § 2050 *et seq.*), or state-listed rare plant pursuant to the Native Plant Protection Act (NPPA; Fish and Game Code §1900 *et seq.*) authorization as provided by the applicable Fish and Game Code will be required.

Project Description and Summary

Objective: The Project would be located on approximately 2,988 acres of rural land that is agriculturally zoned and situated on coastal ridges in southwest area of the City of Lompoc. The Applicant has entered into long-term leases with the property owners of the 2,988 acres. The Project would have an aggregate electrical generating capacity of 102 megawatts (MW), which would supply approximately 44,700 homes with electricity per year.

Major components of the Project include:

- construction and operation of up to 30 Wind Turbine Generators (WTGs)
- 14.3 miles of new access roads
- widening of 16.1 miles of existing non-County roads at the wind farm site and along the transmission line
- modifications to San Miguelito Road
- construction of communication system and meteorological towers
- onsite electrical lines and Project substation, construction of an operations and maintenance building
- 8.6 miles of 115-kilovolt (kV) transmission line from onsite substation to Pacific Gas & Electric (PG&E) Cabrillo Substation in Lompoc and upgrades to the PG&E substation for interconnection.

Location: The proposed Project is located on ridges and valleys of the Santa Ynez Mountains along the coast between Jalama Beach and Point Arguello in Santa Barbara County, approximately 3-5 miles southwest of the City of Lompoc. The southern Project boundary is within the state coastal zone. The Project area is bounded by Vandenberg Air Force Base (VAFB) to the south and west and private property to the north and east, and is accessed via San Miguelito Road. Surrounding land uses include rangelands to the north, west, and south and a diatomite mine to the east.

Habitat types on-site with the potential to be impacted by the project include coastal scrub, freshwater marsh, riparian scrub, eucalyptus woodland, live oak woodland, native and annual grassland, native perennial grassland, and ruderal. Project impacts include an estimated permanent removal of 42.9 acres of habitats and temporary removal of 126.6 acres of habitats (for WTG and power pole installation and construction staging and underground lines).

Wildlife with the potential to be impacted by the project from construction activities include the federal and state endangered and state fully-protected unarmored threespine stickleback (*Gasterosteus aculeatus williamsoni*), the federal endangered El Segundo blue *(Euphilotes battoides allyni),* the federal threatened and state Special Species of Concern (SSC) California redlegged frog (*Rana aurora draytonii*), the Federal and State Endangered Gaviota tarplant (*Deinandra increscens* ssp. *villosa),* the California SSC San Diego desert woodrat (*Neotoma lepida intermedia),* coast horned lizard (*Phrynosoma coronatum frontale),* and silvery legless lizard (*Anniella pulchra pulchra),* and the California Native Plant Society List 1B mesa horkelia

(*Horkelia cuneata puberula),* black-flowered figwort (*Scrophularia atrata),* and Kellogg's horkelia (*Horkelia cuneata sericea).*

Wildlife with the potential to be impacted by the project from construction and operational activities including WTG and power line strikes include the state endangered and fully-protected American peregrine falcon (*Falco peregrinus anatum*), the state fully-protected and SSC golden eagle (*Aquila chrysaeto),* the state fully-protected white-tailed kite (*Elanus caeruleus),* and 11 additional bird species and 5 bat species that are SSC.

Comments and Recommendations

CDFW offers the comments and recommendations below to assist the County in adequately identifying, avoiding and/or mitigating the Project's significant, or potentially significant, direct and indirect impacts on fish and wildlife (biological) resources. Editorial comments or other suggestions may also be included to improve the document.

Project Description and Related Impact Shortcoming

Comment #1: Impacts to Bats

Issue: A review of California Natural Diversity Database (CNDDB) indicates that multiple bat species that are SCC are found on the Project site, including the following: silver-haired bat (*Lasionycteris noctivagans*), western mastiff bat (*Eumops perotis californicas*), pallid bat (*Antrozous pallidus*), western red bat (*Lasiurus blossevillii*), and hoary bat (*Laruirus cinereus*). The Department is concerned with potential impacts to both bird and bat species from utility-scale renewable energy, such as the proposed Project.

Specific impact: Utility-scale renewable energy presents a variety of potential effects to avian species such as bats including, but not limited to, direct and indirect effects of loss of foraging habitat, loss of breeding habitat, direct mortality, increased anthropogenic pressures, and navigational disruptions during migration.

Why impact would occur: The construction of towers, pad and road clearing, and staging of equipment along the Project alignment are likely to lead to loss of foraging and breeding habitat for bats, and direct mortality to bats resulting from direct strikes with WTGs.

Evidence impacts would be significant: Project impacts may result in substantial adverse effects, either directly or through habitat modifications, on a species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by CDFW or USFWS. Adverse impacts to bats may occur because the measures provided do not condition the Project to implement take avoidance surveys prior to operations, including, but not limited to, ground and vegetation disturbing activities.

Recommended Potentially Feasible Mitigation Measure(s):

Mitigation Measure #1: The CEQA document should provide a thorough discussion of potential impacts to birds and bats from construction and operation of the Project to adequately disclose potential impacts and to identify appropriate avoidance and mitigation measures. An

EIR shall describe feasible measures which could minimize significant adverse impacts (CEQA Guidelines §15126.4[a][1]).

Mitigation Measure #2: For any impacts that have been adequately demonstrated to be unavoidable in the EIR, the Department believes that the County should require a scientifically rigorous monitoring and management program as part of the Project's CEQA mitigation, monitoring and reporting program (MMRP) that would include adaptive management strategies (Public Resources Code 21081.6 and CEQA Guidelines Section 15097) as well as plans for relocation of these species. Measures to mitigate for bats may include pre-construction surveys to detect species, use of bat roost installations and preparation of a bat protection and relocation plan to be submitted to CDFW for approval prior to commencement of project activities.

For any Project activities that will result in the removal of trees, buildings or other occupied habitat for any species of bat, CDFW recommends avoidance of these areas. Take of special status bat species could require a mandatory finding of significance by the Lead Agency (CEQA Guidelines § 15065). In addition, bats are considered non-game mammals and are afforded protection by state law from take and/or harassment (Fish and Game Code § 4150, California Code of Regulations § 251.1).

We recommend that if bats cannot be avoided by Project activities and a bat specialist determines that roosting bats may be present at any time of year, it is preferable to push any tree down using heavy machinery rather than felling the tree with a chainsaw. In order to ensure the optimum warning for any roosting bats that may still be present, the tree should be pushed lightly two to three times, with a pause of approximately 30 seconds between each nudge to allow bats to become active. The tree should then be pushed to the ground slowly. The bat specialist should determine the optimal time to disturb occupied bat habitat to maximize bats escaping during low light levels. Downed trees should remain in place until they are inspected by a bat specialist. Trees that are known to be bat roosts should not be sawn-up or mulched immediately. A period of at least 24 hours (preferably 48 hours) should elapse prior to such operations to allow bats to escape. Bats should be allowed to escape prior to demolition of buildings. This may be accomplished by placing one way exclusionary devices into areas where bats are entering a building that allow bats to exit but not enter the building. In addition, CDFW recommends that the Project include measures to ensure that bat habitat remains available for evicted bats or loss of bat habitat resulting from the Project, including information on the availability of other potential roosts that could be used by bats within protected open space on or near the project site.

Comment #2: Impacts to tricolored blackbirds (*Agelaius tricolor*)

Issue: Based on an April 17, 2018 meeting involving relevant stakeholders, the presence of wetlands and suitable habitat on the Project site indicates the need to conduct surveys for tricolored blackbirds (*Agelaius tricolor*), a state listed threatened species.

Specific impacts: Ground disturbing activities from grading and filling, water diversions and dewatering would physically remove or otherwise alter existing streams or their function and associated riparian habitat on the Project site. Downstream areas and associated biological resources beyond the Project development footprint may also be impacted by Project related releases of sediment and altered watershed effects resulting from Project activities. The Project

will remove habitat and likely result in the loss of foraging and nesting habitat for sensitive bird species, including tricolored blackbirds. The placement of towers, access roads, and associated machinery could also lead to diminished habitat in both quantity and quality for tricolored blackbirds.

Why impact would occur: Impacts to tricolored blackbird could result from vegetation clearing and other ground disturbing activities. Project disturbance activities could result in mortality or injury to nestlings, as well temporary or long-term loss of suitable nesting and foraging habitats. Construction during the breeding season of nesting birds could result in the incidental loss of breeding success or otherwise lead to nest abandonment.

Evidence impact would be significant: Project impacts may result in substantial adverse effects, either directly or through habitat modifications, on a species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by CDFW or USFWS. Adverse impacts to tricolored blackbird may occur because the measures provided do not condition the Project to implement take avoidance surveys prior to operations, including, but not limited to, ground and vegetation disturbing activities.

Recommended Potentially Feasible Mitigation Measure(s):

Mitigation Measure #1: The Department recommends conducting focused surveys for tricolored blackbirds and incorporating the results into the EIR. Prior to initiation of construction within or adjacent to suitable nesting habitat, a CDFW-approved biologist with experience surveying for and observing tricolored blackbird will conduct preconstruction surveys in accordance with established protocols to establish use of nesting habitat by tricolored blackbird colonies. Surveys will be conducted within and adjacent to suitable habitat, where access allows, during the nesting season (generally March 15 to July 31). If a nesting colony is found, no activity shall occur within a 500-foot buffer of the colony until a qualified biologist determines and CDFW confirms that all chicks have fledged and are no longer reliant on the nest site.

If take of tricolored blackbird would occur from Project construction or operation, a state incidental take permit (ITP) under CESA would be required for the Project. The Department may consider the Lead Agency's CEQA documentation for its CESA-related actions if it adequately analyzes/discloses impacts and mitigation to state-listed species. Additional documentation may be required as part of an ITP application for the Project in order for the Department to adequately develop an accurate take analysis and identify measures that would fully mitigated for take of state-listed species. The Department has developed guidance for avoiding impacts to this species in rural areas (California Department of Fish and Wildlife (Department) Staff Guidance Regarding Avoidance of Impacts to Tricolored Blackbird Breeding Colonies on Agricultural Fields. March 19, 2015).

Mitigation Measure #2: To protect nesting birds that may occur on-site, the Department recommends that the final environmental document include a measure that no construction shall occur from February 15 through August 31. If construction is unavoidable during February 15 through August 31, a qualified biologist shall complete surveys for nesting bird activity in the orders *Falconiformes* and *Strigiformes* (raptors and owls) within a 500-foot radius of the construction site. The nesting bird surveys shall be conducted at appropriate nesting times and concentrate on potential roosting or perch sites. If any nests of birds of sensitive species are observed, these nests shall be designated an ecologically sensitive area and protected (while occupied) by a minimum 500-foot radius during project construction. Pursuant to FGC Sections

3503 and 3503.5, it is unlawful to take, possess, or needlessly destroy the nest or eggs of any bird or bird-of-prey.

Comment #3: Impacts to El Segundo Blue Butterfly (*Euphilotes battoides allyni)*

Issue: The El Segundo blue butterfly (ESBB), a federally endangered species, was observed near the proposed project site in 2005 (LWEP FEIR) around Tranquillon Peak and an adjacent ridge. The proposed project has potential to impact this species through loss of habitat and/or direct mortality.

Specific Impacts: The host plant for El Segundo blue butterfly is sea cliff buckwheat (*Eriogonum parvifolium*), which is found in the middle of the south end of the Project site. According to the LWEP FEIR, there are an estimated 30.9 acres of habitat on the project site containing the ESBB host plant. Grading for the access roads and construction of WTGs could lead to a loss of sea cliff buckwheat and other El Segundo blue associated habitat and/or direct impacts to the species.

Why impacts would occur: Impacts to El Segundo blue butterfly could result from vegetation clearing and other ground disturbing activities. Project disturbance activities could result in mortality or injury to larvae and adults, as well temporary or long-term loss of suitable nesting and foraging habitats.

Evidence impacts would be significant: Project impacts may result in substantial adverse effects, either directly or through habitat modifications, on a species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by CDFW or USFWS. Adverse impacts to El Segundo blue butterfly may occur because the measures provided do not condition the Project to implement take avoidance surveys prior to operations, including, but not limited to, ground and vegetation disturbing activities.

Recommended Potentially Feasible Mitigation Measure(s):

Mitigation Measure #1: Prior to initiation of construction within or adjacent to suitable habitat, a CDFW-approved entomologist shall conduct directed protocol surveys for the El Segundo blue butterfly during the flight season (approximately mid-June to August) within all areas of coast buckwheat known on the Project site, including areas that would be affected by construction, operation, or maintenance of the project. The surveys shall be documented including a description of methodology, description and maps of the surveyed areas, and identification of locations of any el Segundo Blue butterflies observed within the proposed Project area (including maps and GPS coordinates). The sites where El Segundo blue butterflies are located shall be described by the entomologist, including vegetation, soils, exposure, and other factors that may influence the occurrence of species at that site. If El Segundo blue butterfly is detected, occupied areas shall be designated an ecologically sensitive area and protected (while occupied) by a minimum 500-foot radius during project construction and U.S. Fish and Wildlife Service and CDFW shall be contacted immediately for further direction.

In addition, all suitable habitat for the El Segundo blue butterfly that will be permanently or temporarily impacted by the Project shall be replaced/restored in consultation with U.S. Fish and Wildlife Service and CDFW. Revegetation and restoration of suitable habitat shall include the use of coast buckwheat that is salvaged from the site or native to the local area. All revegetation/restoration areas that will serve as mitigation should include preparation of a restoration plan, to be approved by U.S. Fish and Wildlife Service and CDFW prior to any ground disturbance, that includes: restoration and monitoring methods; annual success criteria; contingency actions should success criteria not be met; long-term management and

maintenance goals; and, a funding mechanism to assure for in perpetuity management and reporting. Areas proposed as mitigation should have a recorded conservation easement and be dedicated to an entity which has been approved to hold/manage lands pursuant to AB 1094 (2012), which amended Government Code §§ 65965-65968.

Comment #4: Impacts to Raptors

Issue: Based on the location and habitats of the Project site, several raptors species are likely to occur on-site, including the state fully protected white-tailed kite. Also, the Project site and surrounding areas are known habitat of the federally and state listed endangered and state fully protected California condor as well as the state fully-protected golden eagle and American peregrine falcon.

Specific impacts: The Project will likely result in the loss of foraging habitat for sensitive avian species. There is also high potential for bird mortality resulting from collisions with WGTs.

Why impacts would occur: Direct impacts include the loss of individual animals during construction and facility operation primarily as a result of (1) collisions by birds and bats with power line poles, lines, WTGs, and WTG blades and (2) being struck by vehicles. The construction of towers, pad and road clearing, and staging of equipment along the Project alignment are likely to lead to loss of foraging and breeding habitat for raptors. Additionally, some tree trimming may be required in the vicinity of power lines. Indirect impacts during the operation and maintenance would be similar to those occurring during construction.

Evidence impacts would be significant: Project impacts may result in substantial adverse effects, either directly or through habitat modifications, on a species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by CDFW or USFWS. Adverse impacts to raptors may occur because the measures provided do not condition the Project to implement take avoidance surveys prior to operations, including, but not limited to, ground and vegetation disturbing activities.

Recommended Potentially Feasible Mitigation Measure(s):

Mitigation Measure #1: To protect nesting birds that may occur on-site, the Department recommends that the final environmental document include a measure that no construction shall occur from February 15 through August 31. If construction is unavoidable during February 15 through August 31, a qualified biologist shall complete surveys for nesting bird activity the orders *Falconiformes* and *Strigiformes* (raptors and owls) within a 500-foot radius of the construction site. The nesting bird surveys shall be conducted at appropriate nesting times and concentrate on potential roosting or perch sites. If any nests of birds of prey are observed, these nests shall be designated an ecologically sensitive area and protected (while occupied) by a minimum 500-foot radius during project construction. Pursuant to FGC Sections 3503 and 3503.5, it is unlawful to take, possess, or needlessly destroy the nest or eggs of any bird or bird-of-prey.

Mitigation Measure #2: The Department cannot authorize the take of any fully protected species as defined by state law. State fully protected species may not be taken or possessed at any time and no licenses or permits may be issued for its take except for collecting those

species for necessary scientific research and relocation of the bird species for protection of livestock (Fish & G. Code, §§ 3511, 4700, 5050, 5515). CDFW has advised the Permittee that take of any species designated as fully protected under the Fish and Game Code is prohibited. CDFW recognizes that certain fully-protected species are documented to occur on, or in, the vicinity of the project area, or that such species have some potential to occur on, or in, the vicinity of the project area, due to the presence of suitable habitat.

Comment #5: Impacts to Golden Eagle (*Aguila Chrysaetos*)

Issue: Based on Project location and habitat, the state fully protected golden eagle is highly likely to occur on the Project site. According to the LWEP FEIR, golden eagles are expected to be present on the site regularly. Nesting golden eagles have been reported in recent years in the vicinity of the Project, likely on Vandenberg Air Force Base.

Specific impacts: The Project will likely result in the loss of foraging habitat for sensitive avian species. There is also high potential for bird mortality resulting from collisions with WGTs.

Why impacts would occur: Direct impacts include the loss of individual animals during construction and facility operation primarily as a result of (1) collisions by birds with power line poles, lines, WTGs, and WTG blades and (2) being struck by vehicles. The construction of towers, pad and road clearing, and staging of equipment along the Project alignment are likely to lead to loss of foraging and breeding habitat for raptors. Additionally, some tree trimming may be required in the vicinity of power lines. Indirect impacts during the operation and maintenance would be similar to those occurring during construction.

Evidence impacts would be significant: Project impacts may result in substantial adverse effects, either directly or through habitat modifications, on a species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by CDFW or USFWS. Adverse impacts to golden eagle may occur because the measures provided do not condition the Project to implement take avoidance surveys prior to operations, including, but not limited to, ground and vegetation disturbing activities.

Recommended Potentially Feasible Mitigation Measure(s):

Mitigation Measure #1: The Department cannot authorize the take of any fully protected species as defined by state law. State fully protected species may not be taken or possessed at any time and no licenses or permits may be issued for its take except for collecting those species for necessary scientific research and relocation of the bird species for protection of livestock (Fish & G. Code, §§ 3511, 4700, 5050, 5515). CDFW has advised the Permittee that take of any species designated as fully protected under the Fish and Game Code is prohibited. CDFW recognizes that certain fully protected species are documented to occur on, or in, the vicinity of the project area, or that such species have some potential to occur on, or in, the vicinity of the project area, due to the presence of suitable habitat.

Mitigation Measure #2: The Department typically recommends proponents conduct individual eagle point count and 10-mile helicopter nest surveys for each proposed project in areas known to support eagles.
(https://www.fws.gov/southwest/es/oklahoma/documents/te_species/wind%20power/usfws_interim_goea_monitoring_protocol_10march2010.pdf)

Because the proposed ministerial permit process does not require this level of analysis, the Department recommends a minimum one-mile buffer be established from each nest known to be active within the last five years to further minimize the potential for impacts and avoid take of the species. In addition, it is important the eagle nest data utilized by the County be comprehensive to the County and should be updated regularly to maximize avoidance to golden eagles.

Mitigation Measure #3: Section 15126.6(a) of the CEQA Guidelines states that an EIR should describe "alternatives to the Project, or to the location of the Project, which would feasibly attain most of the basic objectives of the Project but would avoid or substantially lessen any of the significant effects of the Project, and evaluate the comparative merits of the alternatives." Section 15126.6(f) of the CEQA Guidelines, the "Rule of reason", requires, "The alternatives shall be limited to ones that would avoid or substantially lessen any of the significant effects of the Project. Of those alternatives, the EIR need examine in detail only the ones that the lead agency determines could feasibly attain most of the basic objectives of the Project."

Comment #6: Impacts to Passerine Birds

Issue: The *Biological Resources Report for the Antelope Expansion 1B Solar Project, Los Angeles County, California (SWCA, 2018)* indicates that loggerhead shrike (*Lanius ludovicianus*), a state SSC, was reported on-site.

Specific impacts: Construction during the breeding season of nesting birds could result in the incidental loss of fertile eggs or nestlings or otherwise lead to nest abandonment.

Why impacts would occur: Impacts to passerine birds could result from vegetation clearing and other ground disturbing activities. Project disturbance activities could result in mortality or injury to nestlings, as well temporary or long-term loss of suitable nesting and foraging habitats. Construction during the breeding season of nesting birds could result in the incidental loss of breeding success or otherwise lead to nest abandonment.

Evidence impact would be significant: The loss of occupied habitat or reductions in the number of rare species, either directly or indirectly through nest abandonment or reproductive suppression, would constitute a significant impact absent appropriate mitigation. Furthermore, nests of all native bird species are protected under both federal and State laws and regulations, including the Migratory Bird Treaty Act and California Fish and Game Code Sections 3503 and 3503.5, respectively.

Recommended Potentially Feasible Mitigation Measure(s):

Mitigation Measure #1: To protect nesting birds that may occur on-site, the Department recommends that the final environmental document include a measure that no construction shall occur from February 15 through August 31. If construction is unavoidable during February 15 through August 31, a qualified biologist shall complete a survey for nesting bird activity within a 500-foot radius of the construction site. The nesting bird surveys shall be conducted at appropriate nesting times and concentrate on potential roosting or perch sites. If any nests of birds of prey are observed, these nests shall be designated an ecologically sensitive area and protected (while occupied) by a minimum 500-foot radius during project construction.

Comment #7: Impacts to Unarmored Threespine Stickleback (*Gasterosteus aculeatus williamsoni)*

Issue: As indicated in the Hydrology/Water Quality section of the Notice of Preparation, The Water Resources section of the LWEP EIR determined that the Strauss Wind Energy Project would result in significant impacts regarding flood hazards, water quality, groundwater, drainage and stormwater runoff. Table G-6 (*Summary of Road Crossings and Culvert Sizes*) of the *Strauss Wind Energy Project Conditional Use Application Tab G: Project Description (Sapphos Env. Inc., April 2018)* provides a summary of 8 road crossings of drainage channels. CDFW is concerned that some of these crossings could damage the habitat and water quality found along Cañada Honda Creek, on the west end of the property. According to CNDDB, there are numerous historical records of unarmored threespine stickleback, a state fully protected species, in the Cañada Honda Creek. Except as provided in the Fish and Game Code (e.g., for necessary scientific research), take of any fully protected species is prohibited and cannot be authorized by the Department (Fish and Game Code § 5515 and § 3511). "Take" is defined in Section 86 of Fish and Game Code as "hunt, pursue, catch, capture, or kill, or attempt to hunt, pursue, catch, capture, or kill."

Specific impacts: The Project may result in the loss of streams, associated watershed function, and biological diversity that could directly or indirectly impact the local population of unarmored threespine stickleback.

Why impacts would occur: Ground disturbing activities from grading and filling, water diversions and dewatering would physically remove or otherwise alter existing streams or their function and associated riparian habitat on the Project site. Downstream areas and associated biological resources beyond the Project development footprint may also be impacted by Project related releases of sediment and altered watershed effects resulting from Project activities.

Evidence impacts would be significant: The Project may substantially adversely affect the existing stream pattern of the Project site through the alteration or diversion of a stream. Which absent specific mitigation, could result in substantial erosion or siltation on-site or off-site of the Project.

Recommended Potentially Feasible Mitigation Measure(s):

Mitigation Measure #1: The Department cannot authorize the take of any fully protected species as defined by state law. State fully protected species may not be taken or possessed at any time and no licenses or permits may be issued for its take except for collecting those species for necessary scientific research and relocation of the bird species for protection of livestock (Fish & G. Code, §§ 3511, 4700, 5050, 5515). CDFW has advised the Permittee that take of any species designated as fully protected under the Fish and Game Code is prohibited. CDFW recognizes that certain fully-protected species are documented to occur on, or in, the vicinity of the project area, or that such species have some potential to occur on, or in, the vicinity of the project area, due to the presence of suitable habitat.

Comment #8: Impacts to Sensitive Plant Species

Issue: The project site has the potential to support sensitive plant species. Several state listed sensitive plant species are known to occur in the project area including Gaviota tarplant, mesa

horkelia, black-flowered figwort, and Kellogg's horkelia. The Department considers plant communities, alliances, and associations with a statewide ranking of S-1, S-2, S-3 and S-4 as sensitive and declining at the local and regional level (Sawyer et al. 2008). The final CEQA documentation should provide a thorough discussion on the presence/absence of sensitive plants on-site and identify measures to protect sensitive plant communities from project-related direct and indirect impacts.

Please note, in 2007, the State Legislature required the Department to develop and maintain a vegetation mapping standard for the state (FGC § 1940). This standard complies with the National Vegetation Classification System, which utilizes alliance and association based classification of unique vegetation stands. The Department utilizes vegetation descriptions found in the Manual of California Vegetation (MCV), found online at http://vegetation.cnps.org/. In order for the EIR to determine the rarity ranking of vegetation communities on the Project site, the MCV alliance/association community names should be provided as the Department only tracks rare natural communities using this classification system.

The Department considers natural communities with ranks of S1-S3 to be sensitive natural communities that should be addressed in CEQA (CEQA Guidelines § 15125[c]). An S3 ranking indicates there are 21-80 occurrences of this community in existence in California, S2 has 6-20 occurrences, and S1 has less than 6 occurrences.

Specific impact: Due to Project related activities, such as grading or vegetation clearing for road maintenance, the Project may result in a substantial adverse effect, either directly or indirectly, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by CDFW or the United States Fish and Wildlife Service.

Why impact would occur: Take of special status plant species, including state- and federally-listed species, may occur without adequate detection, avoidance and mitigation measures.

Evidence impact would be significant: Impacts to special status plant species should be considered significant under CEQA unless they are clearly mitigated below a level of significance. To fully mitigate for take of plants listed under CESA, or rare plants listed under the Native Plant Protection Act (NPPA, Fish and Game Code §1900 *et seq.*), further consultation with CDFW may be required.

Recommended Potentially Feasible Mitigation Measure(s):

Mitigation Measure #1: CDFW recommends conducting a spring survey for sensitive/rare plants on-site and disclosing the results in the EIR.

Mitigation Measure #2: We also recommend avoiding any sensitive natural communities found on the Project. If avoidance is not feasible, mitigating at a ratio of no less than 5:1 for impacts to S3 ranked communities and 7:1 for S2 communities should be implemented. This ratio is for the acreage and the individual plants that comprise each unique community. All revegetation/restoration areas that will serve as mitigation should include preparation of a restoration plan, to be approved by U.S. Fish and Wildlife Service and CDFW prior to any ground disturbance, that includes: restoration and monitoring methods; annual success criteria; contingency actions should success criteria not be met; long-term management and

maintenance goals; and, a funding mechanism to assure for in perpetuity management and reporting. Areas proposed as mitigation should have a recorded conservation easement and be dedicated to an entity which has been approved to hold/manage lands pursuant to AB 1094 (2012), which amended Government Code §§ 65965-65968.

Mitigation Measure #3: If the Project, Project construction, or any Project-related activity during the life of the Project will result in take of a plant species designated as rare, endangered or threatened, or a candidate for listing under CESA, the Department recommends that the Project proponent seek appropriate take authorization under CESA prior to implementing the Project. Appropriate authorization from the Department may include an ITP or a consistency determination in certain circumstances, among other options (Fish and Game Code §§ 2080.1, 2081, subds. [b],[c]). Early consultation is encouraged, as significant modification to a Project and mitigation measures may be required in order to obtain CESA authorization. Revisions to the Fish and Game Code, effective January 1998, may require the Department issue a separate CEQA document for the issuance of an ITP unless the Project CEQA document addresses all Project impacts to CESA-listed species and specifies a mitigation monitoring and reporting program that will meet the fully mitigated requirements of an ITP. For these reasons, biological mitigation monitoring and reporting proposals should be of sufficient detail and resolution to satisfy the requirements for an ITP.

Comment #9: Impacts to CESA-Listed Species

Issue: The Department considers adverse impacts to special status species protected by CESA and the federal Endangered Species Act (ESA, 16 U.S.C. §1531 *et seq.*), for the purposes of CEQA, to be significant without mitigation. As to CESA, take of any state endangered, threatened, candidate species, or listed rare plant species pursuant to the NPPA that results from the Project is prohibited, except as authorized by state law (Fish and Game Code, §§ 2080, 2085; Cal. Code Regs., tit. 14, §786.9). Take is defined in Section 86 of the Fish and Game Code as "hunt, pursue, catch, capture, or kill, or attempt to hunt, pursue, catch, capture, or kill".

Specific Impacts: There are multiple listed species with the potential to occur on the Project site. Project related activities, such as grading for road construction, construction and/or operation of WTGs, could lead to the direct or indirect mortality of listed animal and/or plant species.

Why impact would occur: Take of special status plant species, including state- and federally-listed species, may occur without adequate detection, avoidance and mitigation measures.

Evidence impacts would be significant: Project impacts may result in substantial adverse effects, either directly or through habitat modifications, on a species protected under CESA.

Recommended Potentially Feasible Mitigation Measure(s):

Mitigation Measure #1: If the Project, Project construction, or any Project-related activity during the life of the Project will result in take of a plant or animal species designated as rare, endangered or threatened, or a candidate for listing under CESA, the Department recommends that the Project proponent seek appropriate take authorization under CESA prior to implementing the Project. Appropriate authorization from the Department may include an ITP or

a consistency determination in certain circumstances, among other options (Fish and Game Code §§ 2080.1, 2081, subds. [b],[c]). Early consultation is encouraged, as significant modification to a Project and mitigation measures may be required in order to obtain CESA authorization. Revisions to the Fish and Game Code, effective January 1998, may require the Department issue a separate CEQA document for the issuance of an ITP unless the Project CEQA document addresses all Project impacts to CESA-listed species and specifies a mitigation monitoring and reporting program that will meet the fully mitigated requirements of an ITP. For these reasons, biological mitigation monitoring and reporting proposals should be of sufficient detail and resolution to satisfy the requirements for an ITP.

Comment #10: Impacts to Streams

Issue: As indicated in the Hydrology/Water Quality section of the Notice of Preparation, The Water Resources section of the LWEP EIR determined that the Strauss Wind Energy Project would result in significant impacts regarding flood hazards, water quality, groundwater, drainage and stormwater runoff. Table G-6 (*Summary of Road Crossings and Culvert Sizes*) of the *Strauss Wind Energy Project Conditional Use Application Tab G: Project Description (Sapphos Env. Inc., April 2018)* provides a summary of 8 road crossings of drainage channels. CDFW is concerned that the Project location supports streams subject to notification under Fish and Game code section 1600 *et seq.*

Specific impacts: The Project may result in the loss of streams and associated watershed function and biological diversity.

Why impacts would occur: Ground disturbing activities from grading and filling, water diversions and dewatering would physically remove or otherwise alter existing streams or their function and associated riparian habitat on the Project site. Downstream areas and associated biological resources beyond the Project development footprint may also be impacted by Project related releases of sediment and altered watershed effects resulting from Project activities.

Evidence impacts would be significant: The Project may substantially adversely affect the existing stream pattern of the Project site through the alteration or diversion of a stream, which absent specific mitigation, could result in substantial erosion or siltation on site or off site of the Project.

Recommended Potentially Feasible Mitigation Measure(s):

Mitigation Measure #1: The Department has concluded that the Project may result in the alteration of streams. For any such activities, the Project applicant (or "entity") must provide written notification to CDFW pursuant to section 1600 et seq. of the Fish and Game Code. Based on this notification and other information, CDFW determines whether a Lake and Streambed Alteration Agreement (LSA) with the applicant is required prior to conducting the proposed activities. A notification package for a LSA may be obtained by accessing CDFW's web site at www.wildlife.ca.gov/habcon/1600. CDFW's issuance of an LSA for a Project that is subject to CEQA will require CEQA compliance actions by CDFW as a Responsible Agency. As a Responsible Agency, CDFW may consider the CEQA document of the Lead Agency for the Project. To minimize additional requirements by CDFW pursuant to section 1600 *et seq.* and/or under CEQA, the CEQA document should fully identify the potential impacts to the stream or

riparian resources and provide adequate avoidance, mitigation, monitoring and reporting commitments for issuance of the LSA.

Mitigation measure #2: Any LSA permit issued for the Project by CDFW may include additional measures protective of streambeds on and downstream of the Project including further erosion and pollution control measures. Additional mitigation conditioned in any LSA may include avoidance or on-site or off-site creation, enhancement or restoration, and protection and management in perpetuity of mitigation lands to compensate for any on-site and off-site impacts to riparian resources.

Filing Fees

The Project, as proposed, would have an impact on fish and/or wildlife, and assessment of filing fees is necessary. Fees are payable upon filing of the Notice of Determination by the Lead Agency and serve to help defray the cost of environmental review by CDFW. Payment of the fee is required in order for the underlying Project approval to be operative, vested, and final. (Cal. Code Regs, tit. 14, § 753.5; Fish & G. Code, § 711.4; Pub. Resources Code, § 21089).

Conclusion

We appreciate the opportunity to comment on the Strauss Wind Energy Project to assist the County of Santa Barbara in adequately analyzing and minimizing/mitigating impacts to biological resources. The Department requests an opportunity to review and comment on any response that the County has to our comments and to receive notification of any forthcoming hearing date(s) for the Project (CEQA Guidelines; §15073[e]). If you have any questions or comments regarding this letter, please contact Andrew Valand, Environmental Scientist at Andrew.Valand@wildlife.ca.gov or (562) 342-2142.

Sincerely,

Erinn Wilson
Environmental Program Manager

cc: CDFW

Randy Rodriguez – Los Alamitos
Dan Blankenship – Santa Barbara
Andrew Valand – Los Alamitos
Kelly Schmoker – Los Alamitos

Scott Morgan (State Clearinghouse)

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Planner
Santa Barbara County Planning and Development
123 E. Anapamu Street
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RE: Strauss Wind Energy Project Scoping, 16CUP-00000-00031, 18CDP-00000-00001, and 18VAR-00000-00002

Dear Ms. Pfeifer:

Santa Barbara Audubon Society and La Purisima Audubon Society are pleased to submit these comments on the scoping of the Supplement to the Lompoc Wind Energy Project's Environmental Impact Report (SEIR) for the Strauss Wind Energy Project (SWEP). We hope that our comments are constructive for the County and will result in improvements to the project that protect birds and other wildlife.

Audubon works to connect people with birds and nature through education, science-based projects, and advocacy. Audubon has over 1100 members in Santa Barbara County.

Audubon is strongly in favor of renewable energy, including wind energy. Energy production using fossil fuels is a significant source of greenhouse gases. We believe that humans must reduce the production of greenhouse gases that contribute to global warming. Shifting energy production to wind will reduce greenhouse gas production and will reduce the threat of global warming to humans, wildlife and habitats.

That being said, wind energy that is not properly planned, sited, and operated can have a devastating effect on birds. The wind farm at Altamont Pass in the Bay Area provides abundant evidence of this.[1] Audubon is ready and willing to help Santa Barbara County minimize the potential negative effects of the Strauss Project on birds.

Based on its review of the Strauss Wind Energy Project Biological Resources Technical Report of March 7, 2018 (BRTR), Audubon has identified many issues that we believe the County should address in preparing the SEIR. Discussion of these issues is presented below.

Issues Related to Biological Resources

1. General Considerations

The SEIR must include a robust analysis of alternatives. The stated objectives of the project must not unreasonably constrain the range of feasible alternatives evaluated in the SEIR. The County

[1] See, for example: https://www.mercurynews.com/2015/10/30/altamont-pass-controversial-wind-turbine-company-blamed-for-bird-deaths-shutting-down/

must establish an independent set of objectives that do not unreasonably limit the SEIR's analysis of feasible alternatives, including alternative sites. At a minimum, alternatives must include a no-action alternative and an environmentally superior alternative that avoids or greatly reduces significant impacts to resources.

There have been a number of changes to the design of the project since the LWEP was approved by the County in 2009. These include number, size, and location of the wind turbine generators (WTGs). These changes should be specifically analyzed for their effects on birds. We are particularly concerned if it is proposed that WTGs will be moved to the tops of ridges. Such locations have proven to be lethal to birds on other wind farms. The County should look at the latest data on effects on birds of existing wind farms and apply those lessons learned to the SWEP[2,3,4]. The County should devise an environmentally superior alternative to ridgetop WTGs and analyze that alternative for its effect on birds and other wildlife.

In preparing the SEIR, the County should adhere to the requirements of the U.S. Fish and Wildlife Service Land-Based Wind Energy Guidelines of 2012.[5] The County should consider these guidelines to be minimum requirements and should impose more stringent conditions as the local situation allows.

Since the approval of the LWEP there has been much new research on the effects of wind energy on wildlife, including at the National Renewable Energy Laboratory.[6] As the County prepares the SEIR it should be informed by the latest research and use the latest information to guide the design of the project.

The County should consider the potential impact of the proposed project not just on the area directly affected by the construction and operation of the SWEP infrastructure but also how these activities could affect biological resources in the surrounding area. For example, the proposed site is immediately adjacent to Vandenberg Air Force Base (VAFB) and near to the Santa Ynez Estuary, which together are a regionally significant center of biological diversity. This area is designated as an Important Bird Area (IBA) by the National Audubon Society and by the American Bird Conservancy. The Vandenberg Air Force Base and Santa Ynez Estuary IBA is home to 53 species of mammals, 315 species of birds (136 of which have been known to breed on VAFB), 17 species of reptiles, 10 amphibian species and more than 850 plant species (1). The description of the IBA[7] states, "The list of the sensitive birds at this IBA reads like a who's-who list for rare species." Many of these species have populations that extend beyond the VAFB and estuary borders and thus could suffer adverse consequences as a result of the activities at the

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[2] See the American Wind Wildlife Institute documents library which includes peer-reviewed wind-wildlife research, published articles and reports, and publicly available but un-published reports prepared for wind energy facilities in North America (both before and after construction). https://awwic.nacse.org/library.php

[3] See International Energy Agency, WREN: Working Together to Resolve Environmental Effects of Wind Energy. http://www.strix.pt/index.php/en/projects/projects-sustainability/wren

[4] See Bird and bat species' global vulnerability to collision mortality at wind farms revealed through a trait-based assessment, http://rspb.royalsocietypublishing.org/content/284/1862/20170829

[5] See https://www.fws.gov/ecological-services/es-library/pdfs/WEG_final.pdf

[6] See, for example: https://wild.nrel.gov/search/site/?f%5B0%5D=im_field_geo%3A151&f%5B1%5D=im_field_technology%3A37&f%5B2%5D=im_field_animal%3A38 .

[7] See https://www.audubon.org/important-bird-areas/vandenberg-air-force-base-and-santa-ynez-estuary .

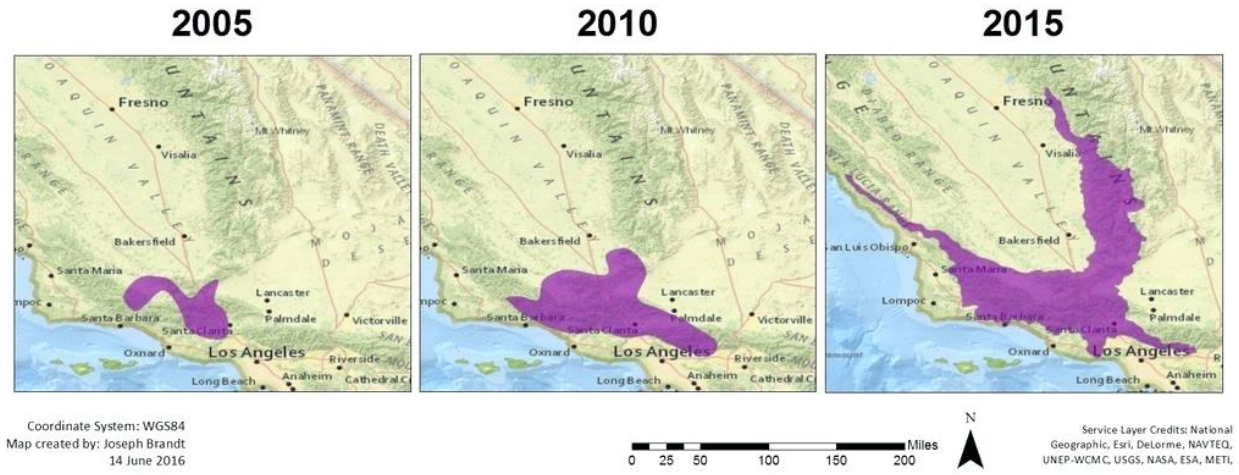
SWEP site. The SEIR should include a section that evaluates the impact of the SWEP on wildlife in nearby areas.

2. California Condor and Other Special-Status Birds

California Condor

We take strong exception to the statement on page 5-17 of the BRTR that " … potentially suitable habitat is present, but this species is unlikely to occur." In fact, the critically endangered California Condor has been gradually expanding its range from its former location in the mountains of Ventura County. The information cited in the BRTR is almost a quarter of a century old! A reference from 1995 is cited! The SEIR must correct this citation with the latest data. The Condor's range has expanded significantly since 1995. In a significant development since the Lompoc Wind Energy Project was approved 9 years ago, condors are now regularly seen in Santa Barbara County. The US Fish and Wildlife (USFW) Service Condor Recovery Project has tracking data that shows that condors have been observed within miles of the Lompoc area.[8] As its range expands, condors will be seen more and more frequently in this area, including in the area of the SWEP. The sequence of maps below[9] demonstrates how the Condor's range is expanding and is now approaching the project area. The County should contact the USFW Condor Recovery Project to get the latest data on the expansion of the condor's range. The SEIR should examine the USFW data and update the information on the condor's range.

Based on the expansion of the Condor's range shown above, it is clear that over the life of the SWEP[10] the Condor will be regularly found in the project area. The SEIR should also analyze the effect of the SWEP on condors and what mitigation measures will be taken to prevent collisions with the WTGs.



[8] See Flight of the Condors: Expanding Their Range".
https://www.fws.gov/cno/newsroom/Highlights/2016/Condor_Flight_Blue_Ridge/

[9] Data from Joseph Brandt, USFWS Wildlife Biologist, 14 June 2016.

[10] According to the NOP, the project "may continue in operation for 20 to 30 years or more"!

Golden Eagle

Please note that the SWEP is also within the range of the Golden Eagle (Aquila chysaetos, GE), which is a fully Protected Species under the California Fish and Game Code Section 3511. According to the BRTR (p. 5-33), "This species was observed during every avian survey conducted at the site in the years 2002, 2005, 2006, 2007, 2008, 2016, and 2017." Since the Golden Eagle so frequently inhabits the project area, the design of the SWEP must provide maximum protection for the Golden Eagle. This is particularly true since, according to the BRTR, ". . . its primary flight activity would be expected to occur up to 300 feet above the ground surface." This altitude would make it highly susceptible to collision with the WTG blades. Note that protection measures taken for the Golden Eagle will benefit the California Condor also.

As part of the SEIR, the developer must prepare an Eagle Conservation Plan (ECP) in accordance with the USFWS Land-Based Wind Energy Guidelines. The Guidelines guide developers through the process of project development and operation. Since Golden Eagles are certainly at risk in the SWEP, the developer must use the ECP Guidance. The ECP Guidance describes specific actions that are recommended to comply with the regulatory requirements in the Bald and Golden Eagle Protection Act for an eagle take permit.

Take Limit Issues

We have not found information in the project documents as to whether the applicant intends to apply for an incidental take permit for the California Condor, Golden Eagle or Bald Eagle. Whether or not the applicant will apply for an incidental take permit should be stated in the SEIR. The applicant must also provide documentation to the USFWS on Golden Eagle use of the Project area and any design features they propose so as to avoid, minimize or mitigate impacts to this species.

In 2016 the USFWS addressed Golden Eagle population demographics and sustainable take, as follows: "In addition to setting EMU [Eagle Management Units] take limits, the Service has established local-area population (LAP) thresholds for permitted take when authorized take in a local area might have long-term negative consequences at that scale. The primary objective of LAP take limits is to minimize chances of extirpation of local breeding or wintering populations of eagles. This is particularly important in a relatively small area like the Lompoc area. The LAP take thresholds are cumulative, such that all ongoing Service permitted take and any new take under consideration for a permit is taken into account. This take is in addition to any existing ongoing unpermitted take that is occurring in the LAP. As such, the LAP take analysis is a form of cumulative effects analysis for each eagle take permit."[11]

Risk Assessment Need

The County, in coordination with the USFWS, should conduct risk assessment for California Condors and Golden Eagles for the proposed project following the USFWS Wind Energy

[11] USFWS. 2016. Milsap et al. Population demographics and estimation of sustainable take in the United States, April 26, 2016 update.

Guidelines. The risk assessment should include the proposed project and environmentally superior alternatives. The USFWS will make a determination of the risk to these birds posed by the Project and any additional surveys or data needed to inform the CEQA analysis for the Project. If the USFWS finds that the project poses an unacceptably high risk to California Condors and/or Golden Eagles, the County either should not go forward with the project or an environmentally superior alternative should be selected.

3. Siting of WTGs and Other Infrastructure

We were alarmed to see that the new project design includes putting WTGs on ridgelines. This conflicts with accepted best practices for wind farm design, which hold that WTGs should be configured to avoid landscape features known to attract raptors (such as ridgelines) if site studies show that such placement would pose a significant risk to raptors[12]. The WTGs and power transmission lines should be moved back from ridgelines or, alternatively, detection and curtailment systems should be employed. At a minimum, the SEIR must include an environmentally superior alternative that moves WTGs and power transmission lines back from ridgelines. If the developer claims that this will make the project economically unviable, the County must require the developer to provide detailed economic calculations that prove that assertion.

We were also alarmed to see that Mitigation Measure "BIO-8a: Siting" does not discuss alternative locations for the WTGs at all. As mentioned above, alternative locations for the WTGs should be discussed in the SEIR. Also, despite its title, the "BIO-8: Bird and Bat Collisions with Turbines, Power Lines, or Met Towers" paragraph does not adequately address design features that could reduce collisions with these design features.

4. Accounting for Improved Bird Collision Technology

Collisions with Wind Turbines[13]

Since the Lompoc Wind Project was approved 9 years ago there have been advances in technology that help avoid collisions between birds and WTG blades, meteorological towers, and transmission lines. The SEIR should evaluate these technologies and, if appropriate, require their use in the SWEP. In March 2016 Audubon Magazine published an article entitled "Will Wind Turbines Ever Be Safe for Birds?"[14] which lists and discusses a number of technological innovations that could potentially reduce bird collisions. These include the use of cameras, radar, and GPS to detect approaching birds and automatically shut down specific WTGs that are in the flight path of approaching birds. A more recently published Audubon article[15] describes one of these latest technological innovations, Identiflight, currently in use at Duke Energy Renewables "Top of the World" wind farm in Wyoming. It is a very successful system that can detect and identify eagles and automatically trigger turbine shutdowns. Accordingly, the SEIR must examine the state of the art in electronic protection systems and how they can be used in the

[12] The USFWS Land-Based Wind Energy Guidelines, p.17, mentions ". . . features such as ridges that may concentrate raptors."
[13] See http://www.windaction.org/posts/22932-vulture-collides-with-wind-turbine#.W1-RyLgnaUk for a video of a vulture colliding with the blade of a wind turbine.
[14] https://www.audubon.org/news/will-wind-turbines-ever-be-safe-birds
[15] https://www.audubon.org/magazine/spring-2018/how-new-technology-making-wind-farms-safer-birds

SWEP to protect California Condors, Golden Eagles, and other birds. Alternatives that include the latest surveillance and curtailment techniques must be included in the SEIR.

Audubon would like to propose that a system similar to Identiflight be installed for the SWEP to protect the frequent Golden Eagles found in the area of the project. Then, in the near future, when the California Condor range expands to include the SWEP area, a study could be done to determine whether additional measures, such as an enhanced detection and avoidance system, need to be taken to protect the condor. Those measures could then be implemented if necessary.

Collisions with Power Lines

Collisions with power lines are a major threat to California Condors, eagles, Turkey Vultures, and other soaring birds. The SWEP includes over 10 miles of power lines, much of which is along public roads. The probability of road kill along those roads is high. Road kill would attract condors and other scavenging birds, including Golden Eagles and Turkey Vultures, to the area. There is certainly a possibility that these birds could collide with power lines while coming in to land near road kills. Many studies of lines with high collision rates indicate that collision risk can be lowered by 50% to 80% when these lines are marked.[16]. Among other protections for the condor and other large soaring birds, marker devices must be used to make power lines more visible. Power line markers are an easy, inexpensive, and effective means of making power lines more visible to birds, especially if attached when the power lines are installed. The County required markers on the transmission lines associated with the Cuyama Solar Project and should also require them on the SWEP. An example of a power line marker is shown below.

Power line marker. Reduces bird collisions dramatically. Inexpensive and easy to install.

The County should also investigate various types of nighttime lighting of the WTGs and select the option that is least likely to attract birds.

[16] See Reducing Avian Collisions with Power Lines, Edison Electric Institute, 2012, page xiii.

5. Power Line Spacing Must Accommodate California Condor

The design of the SWEP must provide sufficient protection for the California Condor from electrocution by power lines. The BRTR, paragraph BIO-8b(b) calls out compliance with the most current "Avian Power Line Interaction Committee Guidelines for Overhead Power Line Spacing, Construction, and Work Procedures." The proposed 115 kV transmission lines must space all overhead power line conductors to minimize potential for raptor electrocution using the most current Avian Power Line Interaction Committee (APLIC) guidelines for line spacing. However, the APLIC guidelines of 2006, updated in 2012, do not account for the wingspan of the California Condor.[17] The APLIC guidelines are based on 60 inches of power line separation, which can accommodate the wrist-to-wrist span of a Golden Eagle (which is approximately 54 inches). However, a Condor's wingspan averages 109 inches, compared to 79 inches for a Golden Eagle. The separation of the electrical conductors should be increased by the same proportion, to 83 inches (instead of 60 inches)[18]. A minimum of 83 inches of separation between electrical conductors is vital to protect the California Condor from electrocution. Applicable project standards must include the statement, "Line spacing shall accommodate protection of the California Condor and shall be a minimum of 83 inches". This statement should be included in the SEIR.

6. Mitigation Measures for Birds

We agree with the County that the mitigation measures put in place for LWEP in 2009 should remain in place. In fact, they should be made more stringent where feasible. However, we are disturbed by the statement in the BRTR, "There was a substantial downgrading of turbines proposed for the Project area, which shall include a smaller footprint than the temporary and permanent impacts proposed in 2009" (p. 5-100). The total project footprint on the ground may be somewhat smaller, but the diameter of the WTGs is much larger, which could increase the impacts on birds. We urge the County to analyze the impact of changing the number, size and, and placement of the WTGs on birds and also to analyze the impact of the changes to the road (see also item #9 below and item #2 in following section).

The County established an Adaptive Management Plan (AMP) for the LWEP in 2009. An AMP for the SWEP is mentioned in BIO-9a in the BRTR, but the description provides no detail. We urge the County to impose a plan which is as least as stringent as the LWEP. In addition, we request that the SEIR include a table that compares the mitigation measures for the SWEP compared to the mitigation measures for LWEP.

Audubon proposes that the AMP that was developed for the LWEP be changed to reflect the following:

> Curtailment of operations must be made mandatory within specific time frames if the other Level 2 response options called out in the AMP to reduce bird mortalities are ineffective. Assuming other measures have been tried, curtailment is the only means of effectively reducing mortality. Curtailment doesn't mean shutting down the entire wind

[17] In fact, the APLIC guidelines state, "Utilities in areas with condors should consider the large size of this endangered species when designing or retrofitting power lines". The larger size of the condor must be taken into account in the design of the SWEP.

[18] 109 inches ÷ 79 inches x 60 inches = 83 inches

farm. The EIR provides that the operator and County staff will do a careful assessment of mortalities to determine which turbines should be shut down and for how long. It could be that only one turbine will be deactivated for a short period of time, for example in the evening hours during the peak of bird migration. The County will make decisions on curtailment deliberately and will balance environmental needs with the operator's need to make a profit. We believe that the evaluation of the effectiveness of response options must be made in a reasonable amount of time, otherwise excessive bird and bat mortalities could continue for years. We propose that the Level 2 response options 1 thru 4 be evaluated over intervals of 6, 12, and 18 months. At those points in time, if none of the other responses were successful, the decision to curtail operations would be made.

Mortality monitoring should be conducted weekly and continued for the life of the project, instead of two years following first delivery of power. In addition, mortality data must be made publicly available. Mortality monitoring provides the vital information needed to determine whether mitigation measures have been effective. Please note that the LWEP AMP specifies that the Level 1 threshold criterion would be triggered by a single fatality of a Fully Protected Species and the Level 2 threshold criterion would be triggered by only two fatalities. These low numbers could occur on any day during the life of the project, from the first day the project starts operation to the last day. Therefore, mortality monitoring could be reduced after some number of years if the mortality levels have never reached the Level 2 threshold.

7. Need for Proof of Any Claims of "Infeasibility"

It may happen that the applicant will make the claim that the Environmentally Superior Alternative for the SWEP is infeasible. Should happen, the County must not accept that claim without proof. The SEIR must include a detailed analysis by a disinterested third party that proves or disproves whether the Environmentally Superior Alternative for the SWEP is infeasible. This analysis must include a financial analysis if the applicant claims that the Environmentally Superior Alternative for the SWEP is financially infeasible.

8. LWEP Mitigation Measure Missing From SWEP

We could find no mention of a certain mitigation measure that the previous developer agreed to with the CDFW on LWEP. This mitigation measure included one of the following: (1) Purchase a conservation easement at a total cost of $450,000; or (2) deposit $450,000 to the California Wildlife Foundation. The SEIR should explain how this obligation is being handled.

Audubon suggests that equivalent funds might be offered to The Nature Conservancy (TNC) for mitigation at the former Bixby Ranch, recently acquired by TNC. The SEIR could evaluate whether similar habitats in need of restoration or disturbed areas appropriate for mitigation planting are available on Bixby Ranch, and whether TNC would consider accepting this dedicated funding.

9. Effects of San Miguelito Road Widening

San Miguelito Road runs next to the creek in the canyon and it appears that widening the road to accommodate the transport of the huge turbine blades will cause significant damage to the environment. The County needs to examine the impact of the widening of San Miguelito Road

on biological resources, including wildlife, trees, and other forms of habitat, and encompassing the riparian habitat in the canyon and also in Miguelito County Park. The County must also devise mitigation measures to compensate the public for damage to habitat.

The project evaluates road widening impacts within 35 feet on each side of San Miguelito Road. The SEIR should evaluate the feasibility of doing most of the widening on the upland side of the road wherever the riparian vegetation or buffer is within the road buffer and then determine whether that will reduce the impact to sensitive biological resources. The BRTR does not identify the extent of riparian vegetation or buffer within the road buffer - the SEIR should do so. The local streamside protection policies need to be further delineated and impacts identified. Actual areas of road widening should be designed in a way that minimizes habitat disturbance.

10. 115 kV Transmission Line Effects

The SEIR must analyze the effect of the change to the route of the 115 kV transmission line on biological resources. In particular, it must examine whether the change to the route will change the likelihood of bird collisions with the transmission line.

The SEIR needs to include the effects of maintenance of the transmission line corridor and the road buffers. There is discussion in the BRTR (pp. 2-7 – 2-8) of the disturbance for installation of the poles for the transmission line and clearance for roads for the installation phase. The easement would be 50-100 feet wide. It is unclear if the transmission corridor must be cleared and thereafter maintained clear, or only the area around the poles, and what ongoing maintenance is required. Where native plant communities are located, whether this is ongoing for the life of the project can be of great significance. The report does mention that there must be 15 feet of vegetation clearance for the conductors, and that the poles will be 75 feet tall, but it is not clear what the tree heights are in the transmission line corridor.

11. Need for Technical Advisory Committee

The County should require the SWEP to convene a Technical Advisory Committee. This Committee should be comprised of parties who are independent of the operator, for example, government agencies such as County staff, CDFG, and USFWS. This Committee should also include a local citizens group or individuals with expertise in bird issues. The Committee should review bird mortality data regularly and should have the authority to shut down the wind farm or parts of it if mortality exceeds predefined thresholds.

12. Provision Needed for Monitoring Mortality and WTG Curtailment

Birds tend to migrate at very specific times of year. The heavy bird migration may be only on a few days during the year. Migration of most species occurs in the early evening. The County should carefully analyze bird migration forecasts now available from raw weather radar data[19] to determine when bird migration numbers are expected to peak. If the data forecast large numbers of migrating birds through the project area, the operation of SWEP should be curtailed (i.e., shut down) so that it avoids high bird mortality rates during those periods. It may be that the wind farm would only need to be shut down a very small percentage of the time in order to avoid significant bird mortality. In addition, during the SWEP operation, the County should require

[19] https://www.nbcnews.com/mach/science/wind-energy-takes-toll-birds-now-there-s-help-ncna866336

the operator to increase mortality surveys during migration periods so that an accurate history of mortality during migration may be determined. Also, as noted in item #6 above, mortality survey data must be made publicly available.

13. Bat Mortality

Bat Conservation International and the Bat and Wind Energy Cooperative may be good sources of siting, equipment, and operational practices to minimize bat mortality, especially during migration. The Western Red Bat is a special status bat, found to be present in the project area. Given that White Nose Syndrome has been expanding westward, minimizing bat disturbance and mortality is important and must be included in the SEIR.

14. Sensitive Plant Impacts

Further analysis should be included in the SEIR for extent of Sawtooth Golden Bush Scrub on the project site and the project's impact to this particular plant species/community. Table 5.1.2-1 of the BRTR describes the Sawtooth Golden Bush Scrub (Hazardia squarrosa Shrubland Alliance) as a ranked natural community, with a ranking of S3. No estimates are made in the BRTR of the acreage of this plant species/community. It is lumped in with non-native grassland. There is no way to determine that the impact on Sawtooth Golden Bush Scrub is "less than significant" with the lack of any analysis. As stated on page 5-60 of the BRTR, additional mapping is needed, particularly in the proposed impact areas.

15. Impacts to Existing Agricultural Zoning

All of the 10 project area parcels are zoned agricultural and are under the Williamson Act to protect farmland. The SEIR should evaluate the impacts to continued agricultural use of the project site. According to the BRTR, the land is currently used for cattle grazing and field crops, largely forage crops. Agricultural fields comprise 114 acres of the project site and 2.5 acres of the transmission line study area (BRTR Table 5.1.2-1). Our review is of the BRTR, but the SEIR must include impacts to areas currently under agricultural use. If areas currently in agriculture are converted to use by the wind farm, it must be determined whether there are alternative areas that could be used for agriculture without disturbing native habitats on the property.

16. Mitigation for Vegetation Removal

Should there be inadequate area for mitigation plantings, especially for trees, the SEIR should evaluate whether the nearby Bixby Ranch, now owned by TNC, would allow mitigation plantings. Given there was illegal grading at Bixby Ranch prior to TNC's ownership, there is likely to be need for restoration. The two needs might be compatible.

17. Questionable Gaviota Tarplant Strategy

Transplantation of Gaviota Tarplant plants is suggested as a restoration strategy. Given the tarplant is an annual species, this seems unlikely to be a productive strategy. The probability of success of the transplantation of tarplant should be evaluated in the SEIR. Alternatively, it would be desirable to evaluate a seed collection strategy used by the UCSB Cheadle Center for Biodiversity and Ecological Restoration (CCBER) for Southern Tarweed seed collection. CCBER collects whole plants when seeds mature and annual plants are nearing the end of their

life cycle. They crush the whole plants in trash bins and save the material for seed dispersal. Seed collection would be very time-consuming. Gaviota Tarplant seeds should be collected when seeds are mature prior to construction disturbance. Only seeds from the project site should be used in order to maintain the biological integrity of the plant community.

18. Tanbark Oak Impacts

Tanbark Oak (Tanoak) is a relict species in Santa Barbara County, with few stands; it is more common in northern California. The species is very susceptible to Sudden Oak Death and has been severely affected in northern California. The disease has not yet affected Santa Barbara County. Tanoak has a high habitat value, as it is a regular acorn producer, while other oak species often are mast producers with years of low acorn production. Maximum avoidance of disturbance and removal is thus important. Tanoak Forest is a State Sensitive plant community.

The project site includes 47.52 acres of Tanoak forest, according to the BRTR. The proposed project would remove 390 tanoak trees. Tanoak must reach the age of 30 - 40 years before it is sufficiently mature to produce acorns.[20] Although mitigation plantings are proposed, at a 10:1 ratio it would take 30 – 40 years before the benefit to the environment of those plantings would be realized.

The wind turbine site #28 (WTG28) impact area has 390 trees, including 327 Tanoak and 63 Coast Live Oak. For Tanbark Oak, this appears to be 83% of the Tanoaks proposed for removal, and 60% of all native trees proposed for removal for the whole project. Therefore, the SEIR must determine an alternative site for WTG28 and include it in the environmentally superior alternative.

<u>Other Issues</u>

1. 115 kV Transmission Line Route Effects on Aesthetics / Visual Resources

The alternatives analysis for the Lompoc Wind Energy Project identified an Environmentally Superior Alternative route for the 115 kV transmission line that would reduce impacts to less than significant. This alternative route was included in the approved LWEP CUP. However, the proposed SWEP has selected a different route for the 115 kV transmission line, with no explanation for this choice. The County must explain why a different route was chosen, analyze its effects on the environment, and devise mitigation measures, if needed, for the new route, including the effect on birds and other wildlife.

2. San Miguelito Road Widening Effects on Recreation

We agree that the SEIR should analyze the impacts of the proposed modifications of San Miguelito Road as they relate to recreational activities. The County should include the effect on birding in that analysis. San Miguelito Road runs next to the creek in the canyon, and it appears that widening the road to accommodate the transport of the huge turbine blades will cause significant damage to the environment, including in the riparian habitat in the canyon and possibly also in Miguelito County Park[21]. Both the canyon and the park are used extensively for

[20] Tanoak conservation: a role for the California Fish and Wildlife. Patricia Bowcutt, California Fish and Game 100(1): 94-113. 2014.

[21] Whether Miguelito County Park is affected by the project is unclear from the project documents.

birdwatching. Miguelito County Park is an eBird Hotspot,[22] which demonstrates the importance of the park and the surrounding area to recreational birding The County must examine the impact to recreation due to the loss of habitat and devise appropriate mitigation measures.

We appreciate the opportunity to comment on this important work and look forward to continuing dialogue with the County as the project progresses.

Sincerely,

Cherie Topper, Executive Director
Santa Barbara Audubon Society

Michael Taaffe

Michael Taaffe, President
La Purisima Audubon Society

[22] https://ebird.org/hotspot/L469120

COLAB

The Coalition of Labor, Agriculture & Business

August 8, 2018

Attention: Kathy Pfeifer, County Planner
Santa Barbara County Planning Department
Via Email

Re: Strauss Wind Energy Project

Dear Ms. Pfeifer,

Whereas, COLAB is certainly no fan of the overwrought application of CEQA requirements to local projects that have little to no chance of having a significant effect on the environment, we are even less friendly towards double standards as it relates to the same.

Regarding the Strauss Wind Energy Project, we find it absolutely unbelievable that the county is planning on trying to tier off of a ten-year-old EIR from a different wind energy project (and different project applicant) that is planning on using a different number of turbines that are even bigger than previously proposed.

Based on this precedent, why not consider one winery EIR as the basis document for another? If all wind energy projects are basically similar, are not all winery projects even more so? Or, how about oil projects for that matter?

Of course, with wind energy, the size, vibration, and speed of the blades makes all the difference in the world if you are a bat, a bird or a neighbor! In this case, the project makes all the difference in the world to all the people who live in Miguelito Canyon. If this project were not for green energy, it would have been rejected out of hand for being growth inducing in view of the fact it requires the widening of the roadway!

Things can certainly change in a ten-year period. Moreover, alternatives change in ten-year periods too. Consider the fact that Supervisor Das Williams wants an alternative energy project located somewhere in the South County to fuel his dream of Community Choice Energy. Well, doesn't the wind blow pretty good on the Gaviota Coast? The county should do an entirely new EIR and consider alternative locations for this project. We recommend the sight of the soon-to-be defunct Gaviota oil production sight for a wind energy project as this.

Moreover, what do we know about the current bird and bat flight patterns, including endangered species, in this area today as compared to ten years ago? What consideration has been given for view corridor impacts considering the height of these turbines compared to the previous project? What about the vibration effect on nearby residents? We know full well that these projects slice

COLAB PO Box 7523, Santa Maria, CA 93456 Ph. (805) 929-3148 Email: Andy@colabsbc.org

and dice endangered species, why are we even considering it, let alone giving it a preferred path through the planning process?

We have witnessed single family homes being rejected due to viewshed impacts. We have seen winery projects rejected due to traffic concerns and road conditions. What about the impact of this eyesore on the entire Lompoc valley that will change the nature of one of its most pristine canyons?

Thank you for your consideration of these comments.

Andy Caldwell
Executive Director
COLAB

FROM: David W Grill
1700 Riverview Terrace
Lompoc, Ca 93436

TO: Kathy Pfeifer
Planning and Development
County of Santa Barbara

REGARDING: Strauss Wind Energy Project

Dear Sirs,

I am entirely against this wind energy project or any other wind energy project.

America in general and California in particular would not need additional energy if all legal and illegal immigration were stopped and non-citizens sent home.

The slaughter of birds by wind turbines is scandalous, and is not acceptable just because the federal and state governments allow such slaughter to continue. Birds cannot comprehend blade tips moving at rotary speeds of three or four hundred miles per hour. The killing of golden eagles, bald eagles, ospreys, and vultures is bad enough, but killing a condor will be beyond forgiveness.

Whether a wind turbine is planted on land or at sea, great low frequency vibrations will be propagated in all directions. These acoustic pressure waves travel through the air, rock, soil, or sea and disturb all animal life. A desert devoid of life will be created as time passes and the environmental insult continues. This truth was discovered in the Baltic Sea when turbines were planted off-shore from Germany and all sea mammals departed the area.

This wind farm is not a solution to a Lompoc problem. Lompoc has its own energy sources. Lompoc does not need Strauss Wind Energy output.

Thirty miles of new or widened roads in the back country will do untold harm to the endangered species already known to be there. Miguelito Canyon is beautiful as it is. Strauss will mutilate it. No thank you.

Finally, eight miles of aerial high-tension power cables are a threat to causing brush fires.

If Santa Barbara wants more clean electrical energy, build the wind farm along Camino Cielo Road in Santa Barbara.

Respectfully Submitted,

David W. Grill
1700 Riverview Terrace
Lompoc, Ca
805-736-1708

From: Stephen Ferry
To: Pfeifer, Kathy
Subject: RE: California Condor Range Expansion
Date: Tuesday, July 24, 2018 1:40:20 PM
Attachments: image001.jpg

Hi, Kathy,

Here's a link https://www.fws.gov/cno/newsroom/Highlights/2016/Condor_Flight_Blue_Ridge/ .

Where can I find information on the detailed project description, including for example:

impact bio-10, Avian and Bat Collisions w/ WTGs.

what mitigation measures are proposed for Strauss compared to LWEP?

Regards

Steve

From: Pfeifer, Kathy <Kathypm@co.santa-barbara.ca.us>
Sent: Tuesday, July 24, 2018 11:17 AM
To: Stephen Ferry <stephenjamesferry@gmail.com>
Subject: RE: California Condor Range Expansion

Steve,

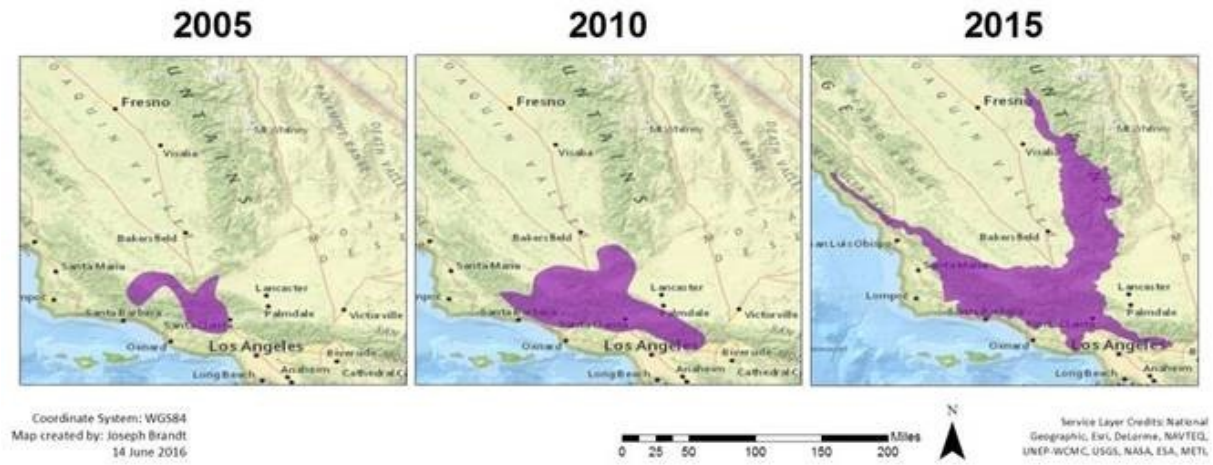
Thank you for cc'ing me on this email. I'm trying to print it out and it prints like a very thin long column – can you resend or send me a link or send as an attachment?

Thank you, Kathy

From: Stephen Ferry <stephenjamesferry@gmail.com>
Sent: Saturday, July 21, 2018 1:59 PM
To: Day, John <Jday@co.santa-barbara.ca.us>
Cc: Pfeifer, Kathy <Kathypm@co.santa-barbara.ca.us>; Briggs, Errin <ebriggs@co.santa-barbara.ca.us>
Subject: California Condor Range Expansion

Hi,
John,

I thought that you'd be interested in this sequence of maps that demonstrates how the California Condor's range is expanding and is now approaching the Strauss project area.



Based on the expansion of the Condor's range shown above, it seems clear that over the life of the Strauss Project the Condor will be regularly found in the project area.

Regards,

Steve Ferry

From: Stephen Ferry <stephenjamesferry@gmail.com>
Sent: Thursday, July 19, 2018 10:22 PM
To: John Day jday@countyofsb.org) <jday@countyofsb.org>
Cc: Kathy McNeal Pfeifer (kathypm@countyofsb.org) <kathypm@countyofsb.org>; Errin Briggs <ebriggs@countyofsb.org>
Subject: Audubon Magazine article on using technology to reduce impact of wind farms on birds

Hi, John,

Good to see you again at the Strauss scoping meeting tonight!

Here's the link to the article in Audubon Magazine regarding using technology to reduce impact of wind farms on birds. https://www.audubon.org/magazine/spring-2018/how-new-technology-making-wind-farms-safer-birds .
(Audubon Magazine is published by the National Audubon Society, of which Santa Barbara Audubon Society is a chapter).

Regards,

Steve Ferry
Santa Barbara Audubon Society

From:	Stephen Ferry
To:	Day, John
Cc:	Pfeifer, Kathy; Briggs, Errin
Subject:	Audubon Magazine article on using technology to reduce impact of wind farms on birds
Date:	Thursday, July 19, 2018 10:21:51 PM

Hi, John,

Good to see you again at the Strauss scoping meeting tonight!

Here's the link to the article in Audubon Magazine regarding using technology to reduce impact of wind farms on birds. https://www.audubon.org/magazine/spring-2018/how-new-technology-making-wind-farms-safer-birds .
(Audubon Magazine is published by the National Audubon Society, of which Santa Barbara Audubon Society is a chapter).

Regards,

Steve Ferry
Santa Barbara Audubon Society

From:	Zorovich, John
To:	Pfeifer, Kathy
Subject:	FW: Proposed Wind turbine project near Lompoc
Date:	Wednesday, July 25, 2018 11:42:58 AM

FYI.

From: Mason, Steve
Sent: Wednesday, July 25, 2018 10:19 AM
To: Zorovich, John <Jzoro@co.santa-barbara.ca.us>; Villalobos, David <dvillalo@co.santa-barbara.ca.us>
Subject: FW: Proposed Wind turbine project near Lompoc

Steve Mason
Assistant Director
Planning and Development Department

From: lindyt@aol.com <lindyt@aol.com>
Sent: Wednesday, July 25, 2018 9:49 AM
To: PAD <PAD@co.santa-barbara.ca.us>
Subject: Proposed Wind turbine project near Lompoc

I am totally opposed to this project once again. It will not benefit Lompoc. Let PG&E get their power from land in the area they service. What is needed in that area is solar. Not those huge turbine blades that may kill huge amounts of migrating birds and possibly make enough noise to be heard miles away. Not against progress, but not when it does not benefit the people this project will affect with those power lines going through Lompoc to the out of town PG&E customers.

Linda Sheehan
Lompoc, California

From: joy
To: Pfeifer, Kathy
Subject: Strauss Wind Energy Project
Date: Sunday, July 29, 2018 2:26:00 PM

Dear Kathy,

This new project should have a total new EIR. A lot has changed in the last 10 years in the canyon (we now have a 365 day fire season, weather changes and animal changes) and this plan really is not "broadly similar" to SWEP (location on ridges, size of towers, power line and power line poles, road construction, State Coastal Zone, oak trees, federally designated wetlands, endangered animals and plants). All these things would effect the EIR. We need to error on the side of caution and have all the facts before things are done they can't be undone.

"In the event of a fire fault or excess vibration or temperature, the WTG would be halted immediately, and an alarm condition would be activated in the control system that could send a page or message to a cell phone of the on-call operators or the local fire district (first responders), as required." There is spotty to no cell phone coverage so you can't rely on cell phones to contact anyone. And shouldn't it be will send a message not could send? And why is it only an or to contact the local fire district? Any hint of a fire should be sent to the local fire district. Are the going to be held responsible for any fire caused by them?

" Each WTG blade is an independent fail safe system, and can stop the rotor from going in overspeed." Sorry nothing is fail safe and shouldn't it be will stop not can stop?

"Any new or used oils would be stored on a concrete slab with a containment curb to contain any spills." These should be stored in fire proof bunkers including the gas that will be used for their generators and motorized equipment. Each WTG holds from 70 to 200 gallons of oil. That is 2100 to 6000 gallons of oil in the WTG's on site. How many gallons are they going to have on site for maintance? How many gallons of gas and diesel are they going to have on hand for their generators and fueling their equipment? Even if their equipment or WTG's doesn't start a fire, we are at the point now where the question is not if… but when the next fire will be. That is a lot of fuel that will make any fire worse. The canyon and the animals are still recovering from the last fire.

"The O&M facility will have gated access with partial or full perimeter fencing." Will fire fighters, police and inspectors have access to the gate? They also say nothing about a security guard on site , they say "If an intrusion is suspected, security personnel would be deployed to the site". It will be to late if the have to be sent to the site.

One of the biggest cause of envinmental disasters are self regulated companies: electrical, oil and wind farms companies not maintaining their lines and equipment. Who is going to make sure that the required maintenance is preformed at correct intervals and preformed correctly? They should have to pay for county or state personal to preform yearly inspections of their records and site. We can all see that if they have no checks they will let disasters happen and then cry it cost them to much to fix the problems they caused. Most of which could have been avoided if they maintained their equipment in the first place. Set up a disaster trust so they can pay for damages?

Their proposed mitigation of killing the food source of the raptors will destroy the eco system of the canyon. This should be avoided at all cost.

Living close to power lines has been shown to increase the risk of leukemia and other cancers since 1979, when convincing evidence was first published by Wertheimer and Leeper in the American Journal of Epidemiology.

Since then, dozens of published papers have found links between living near power lines (and other electrical wiring configurations) and a range of health woes, including

brain cancer
childhood and adult leukemia
Lou Gehrig's disease (ALS)
Alzheimer's disease
breast cancer in women and men,
miscarriage, birth defects and reproductive problems,
decreased libido
fatigue
depression and suicide
blood diseases
hormonal imbalances
heart disease
neuro-degenerative diseases
sleeping disorders
and many others.

To appreciate the sheer weight of this evidence, see the excellent list of published research papers compiled by Powerwatch UK which identifies over 300 papers relating to EMF from power lines and electricity sub-stations.

Of these, more than 200 were able to find a link between this type of radiation and (mostly) harmful biological effects. It is extremely unlikely that all these studies were mistaken in their conclusions.

Are they going to supplement the health insurance of all the people that live along this line? Are they going to protect all the houses from EMF?

The Wall Street Journal reported in 1993 that the real estate resale value of homes decreased by as much as 30%, if exposed to electromagnetic fields. I'm sure this percentage is higher now. Are they going to compensate the home owners for this loss?

I am also concerned about: the noise, road widening, traffic, speed with the road widening, congestion and road kill caused by the speed, traffic and the animals running scared from the construction, self monitoring of operations, no yearly inspections, the views, the effects on the eco system, the deaths of birds and bats, infrasound, the effects on the creeks and water shed, air pollution, the loss of trees, the health effects of the WTG's and the transmition lines on people and animals (domestic and wild), the change in the environment near the WTG's, the light pollution, the run-off of water when it rains caused by road construction and pole placement, not being about to drive up to Sudden road and see the ocean and the view, the companies safety record, the ability of fire fighters to access fires, the safety of the fire fighters(most of the time they have to let the WTG's burn as they don't have ladders to reach them, the transportation of Hazardous and potentially hazardous chemicals, the storage of Hazardous and potentially hazardous chemicals, the company going bankrupt and not having the money to remove and fix the site, the wear and tear of the city of Lompoc roads and San Miguelito Rd, the lack of the ability of county of Santa Barbara or the city of Lompoc to do anything other then fine the company, the lease being 30 years what happens if you find the impact of the wind farm is more then anticipated, shouldn't there be a clause that gives SBC or the city of Lompoc more rights?

Now on a personal side: We bought this house because of it's location. Pristine canyon views, low traffic, wild life, quiet peaceful setting, fresh country air, 100 acre zoning and a small drive up the road to see an awesome view and the ocean. The house was also bought as an investment. All these things will be taken away with this project. I really don't want to lose 30% because of

powerlines and 10 to 20% because of views lost. It is not that I'm against clean energy. We just had solar panels put on the house and have talked other people into going solar. I believe in having all the facts and limited impact on the environment, eco systems and people. I believe this project impacts all three. I also believe that this project has a lot of if's and may's that also need to be looked into.

Thank you for your time and consideration of my concerns,
Joy Boll
1375 San Miguelito Rd

Kathy Pfeifer, Planner July 30, 2018
Santa Barbara County Planning & Development
123 East Anapamu Street
Barbara, CA 93101

Re: Notice of Preparation of a Draft Supplement to the Lompoc Wind Energy Project Environmental Impact Report for the Strauss Wind Energy Project.

Dear Ms. Pfeifer,

I have reviewed the Notice of Preparation of a Draft Supplement to the
Lompoc Wind Energy Project EIR and would like to provide the following comments:

1. Both the Lompoc Wind Energy Project EIR and the project description provided in the Strauss Wind Energy Project Conditional Use Application* are silent on the actual routes to be taken through the city of Lompoc. The Draft Supplement should provide those routes with details of the economic and safety impacts to the business and residential sections of Lompoc.

2. The CUP application for the Strass Wind Farm states that water for the batch plant and for dust control will be trucked in from the Lompoc Regional Wastewater Reclamation Plant (LRWRP) at 1801 W. Central Ave. Lompoc, CA. The minimal calculations for the number of trips is 1344 trips per month.** The project description does not provide the route these trucks would take through Lompoc. The Draft supplement should provide any routes or alternative routes along with a discussion of any schools in the immediate area. It should also assess the impacts of increased traffic, noise and safety to nearby residents and schools.

3. Miguelito Canyon Road is a one way in, one way out road. There are no options for detours if the road is blocked by large transport vehicles. The Draft supplement should address the amount of time any section of the road could be blocked to the extent that residents cannot get into or out of the canyon. It should include information on how residents will be noticed in advance of any blockage. Blockage of the road is not an "inconvenience". As the caregiver for two elderly parents, it is a life and safety issue.

Sincerely,

Karen Osland
1383 San Miguelito Road,
Lompoc Ca 93436

kosland@comcast.net.

*4.4 Construction Traffic
"All Project materials would be brought to the site via Highway 101 to Highway 246 from the north or via Highway 101 to SR-1 from the south. "Strauss Wind Energy Project TAB G: Project Description March 15, 2018 Sapphos Environmental, Inc. Page G-31

**Table G-9, pg. G-36, Strauss Wind Energy Project March 15, 2018 Sapphos Environmental, Inc.
1. Water Trucks calculation: 7 trucks times 4 fills times 2 (roundtrip) times 6 days per week times 4 weeks per month equals 1,344 trips per month for 6 months (Month 2-7). This would reduce to 2 trucks per day for two months (Month 8 and 9).

From:	elizabeth elizalde
To:	Pfeifer, Kathy
Subject:	Lompoc Wind Energy Project -Public Comment
Date:	Tuesday, July 31, 2018 10:16:43 AM

July 31, 2018

County Planning & Development
Attention: Kathy Pfeifer
Re**: Lompoc Wind Energy Project - public comment**

These massive giant wind turbines will destroy our scenic environment and be a visual intrusion to many. You will be able to see these when visiting Jalama Beach or taking a scenic drive on Harris Grade. These wind turbines are an environmental eye sore. They ruin landscapes and make a minimal contribution to our energy needs. Landowners and developers are enriched, while the consumer is impacted with it intrusion to our environment. These 492 ft tall wind turbines are completely out of place for our beautiful scenic area, the Central Coast!

What about our property values? It has been studied and stated that wind farms will reduce property values. (See attached link): www.forbes – search under – **Do wind turbines Lower Property Values? Jude Clemente Contributor i** Sep 23, 2015, 10:28am 17,235 views
Michael McCann, of McCann Appraisal, LLC based in Chicago, concludes that: *"Residential property values are adversely and measurable impacted by close proximity of industrial –scale wind energy turbine projects to residential properties." Up to 2 miles and a range of 25% to approximately 40% of value loss."*

There has also been new research showing that wind farms may have a negative effect on area surface temperatures. (See attached link): - https://www.zdnet.com/article/do-wind-farms-have-a-negative-effect-on-the-environment/
A study completed by SUNY at New York looked at 10 years of data and the article states the following: *"the results showed night-time surface temperatures around areas with high volumes of wind turbines were 0.72 degrees higher than areas where no wind farms existed.*

We need to ask ourselves; What amount of energy is used to make these massive 492 foot tall giants? They are made of steel! A good point is made in the Forbes articles: *"Does the coal miner that mines the coal, that makes the steel that makes the wind turbine have a green job."* We are ignoring the cost to our environment and the price to manufacture these wind turbines.

We have a beautiful landscape here in Lompoc. Have you been to Jalama Beach or to Harris Grade to view our area? Please leave these 492 foot monsters out of our area and **do not allow** wind turbines to be placed **anywhere in Santa Barbara County**. Once allowed, this will set a **precedent for others**. Please **not in our back yard.**

Thank you for taking the time to read my comment.

Sincerely,
Elizabeth Elizalde
508 South O Place Lompoc, Ca.
Email: lizalde1@msn.com Phone: 805 588-1080

From: Mary Edwards
To: Pfeifer, Kathy
Subject: Strauss Wind Project
Date: Monday, July 30, 2018 6:39:45 PM

Kathy,

Additional concerns from the scoping meeting:

Strauss plan calls out the amount of added traffic from the transport of construction material, water, workers plus the possibilities of closing roads and working in some cases into the night due to constraints. There is no mention of how this will take place through the city. Getting from highway 1 or 246 is a big jump to San Miguelito Rd, or how this would be convened to the residents. In the event of medical emergencies what would the protocol be? Presently there is very limited patrolling of the roads up here, this needs to be reviewed, with the road being widen, we will have a speed way up here.

Transmission lines being installed from poles 68 – 71 does require new access roads, this will change the Topography of the water run off from the mountain into the canyon road. Houses directly in front of these lines will be affected, as well as the "EMF", which is continuously being studied due to unknown adverse effects. Strauss per their details on page G-29 state "The Applicant anticipates acquiring easements ranging from 50 to 100 feet wide, depending on design, span length, and terrain." These line would be approx., 300 to 500 ft. from our homes. Since the true size of these structures are not called out in their plan, the mountain range in front of our homes will/may be destroyed as well.

The Strauss Plan also makes the statements in table G-6 "100 year storm water" events: well this has come to pass recently, we have had several of these events and they need to be addressed without waiting for the event to happen and than plan.

Fire season is 365 days a year not just a date on the calendar, making suggestions for clearing landscaping and maintaining around these turbines or the O & M building that will house, used and new oils and gas - at just this time of year is unacceptable. We as home owners are required to have 100 ft. defendable space for fires, why is this only 10 ft. in their planning.

In the Strauss plan there are alot of "could or may " statements in regards to safety: why are these not "Will" statements. I reference the fuel barrier, the braking system of the turbines, the O & M building, fire response of these system.

The original EIR was slated for smaller turbines than what is being presented today, yes there are fewer but these are more powerful. Lights will be required according to FAA, noise levels for 2009 project – were @ 45Db what is the noise output for these larger units. We have a Dog sanctuary in this area, will these have adverse effects on them?

The EIR should be totally re-done, the requirements, the affects on our environments, should not be looked upon lightly, once you start this project there will be no way to undo the damages.

I believe in renewable energy, I invested in solar to be responsible. I believe that in 2009 when this was approved, there wasn't a California law to have "Solar" on new construction, with that said will the O & M building have solar as well?

We have other ways to create renewable energy without destroying the scenic views, disrupt the natural beauty of the environment, animals and birds habitat. We need to protect our eco systems for the future and this has to be looked at in detail.

As a home owner the fear of not being able to access our home in the event of fire, and storms is a real concern. We have 1 way in and 1 way out when a fire does occur, fire agencies will need additional resources to combat these situations because we know they will "Happen".

Security for these turbines should be looked at as well, we know times are changing and values are too, no longer are the days of not locking your doors. Strauss states they will have monitoring , but how long before a real person can handle a situation. We saw with the oil spill, how long it took for intervention to occur, we can't have that happening with these turbines.

Thank you Very Much
Mary Edwards
1375 San Miguelito Rd
Lompoc CA

321-946-5257