



March 11, 2014

Supervisor Peter Adams
511 East Lakeside Pkwy, Suite 47
Santa Maria, CA 93455

Re: Conflict of Interest, AMEC Environment & Infrastructure, Inc.

Dear Supervisor Adams,

I am writing you as senior legal counsel for AMEC Environment & Infrastructure, Inc. (AMEC) regarding recent inflammatory statements made in public hearings on October 8 and 15, 2013 and March 4, 2014 regarding AMEC and one of our Senior Project Managers, Mr. Dan Gira.

AMEC understands that you have been previously involved in litigation against the County of Santa Barbara and Mr. Gira, when the latter was acting in his official capacity as Deputy Director of Santa Barbara County Planning and Development Department, and that such litigation was ultimately unsuccessful. We understand that Adams Bros. Farming, Inc. sued the County of Santa Barbara and several of its employees in federal court, alleging that the County had, through a false wetland delineation, temporarily taken its land without providing just compensation in violation of the Fifth Amendment. In the matter of *Adam Bros. Farming, Inc. v. County of Santa Barbara, 2010*, the United States Court of Appeals for the Ninth Circuit affirmed a District Court's prior dismissal of this complaint. The District Court granted the County's motion to dismiss this litigation and concluded that Adam Bros. Farming, Inc. claim was not ripe because Adam Bros. Farming, Inc. failed to demonstrate that it had sought and was denied just compensation under state law. The Appeals Court affirmed the District Court's judgment. Therefore, litigation you previously engaged in against the County of Santa Barbara and several of its employees, including Mr. Gira, was unsuccessful and has been dismissed by the Courts.

AMEC takes any statements made in public about AMEC or our employees as a serious matter. Because you have previously been involved in litigation against a senior AMEC Project Manager and his former employer (i.e., the County of Santa Barbara), we assert that this raises a clear material conflict of interest for you regarding any and all projects that AMEC has with the County of Santa Barbara, as well as all prospective environmental and planning service bidding opportunities throughout the County. Elected public officials are held to a high standard and must respect potential for both material and perceived conflicts of interest. We assert that you have substantiated these conflicts of interest through your repeated references to prior litigation involving your personal interests. These statements are in the public record; further, these statements have been made where and at a time when you are an acting member of the County Board of Supervisors. These statements have impugned the integrity of both AMEC, and one of our employees, Mr. Gira. We therefore respectfully request that you formally recuse yourself from any future engagements and decisions that involve AMEC contracts (current and prospective) presented before the Santa Barbara County Board of Supervisors.

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AMEC operates more than 100 offices in North America, with more than 3,000 employees. AMEC's Environment & Infrastructure division is part of AMEC plc, an international engineering services company that provides design, project delivery, and maintenance support to clients in the oil and gas, transportation, industrial, and infrastructure sectors. The company generates annual revenues in excess of \$6 billion and works at the local, national, and international level, employing 26,000 people throughout North America, the United Kingdom, Continental Europe, and some 40 countries worldwide. As part of our international business practice, AMEC maintains strict codes of conduct for all of our employees and requires regular training in business ethics and employee conduct. As such, AMEC expects exemplary business conduct from all of our employees.

We note that AMEC has an excellent relationship with the County of Santa Barbara and we hope to maintain this relationship. AMEC has successfully contracted with the County for preparation of Environmental Impact Reports (EIRs); the high quality of our environmental analysis has been recognized by County decision-makers, staff, and project applicants. In fact, on May 19, 2009, AMEC received an official Resolution passed unanimously by the Santa Barbara County Board of Supervisors commending AMEC's work on the *More Mesa Handbook* for which Mr. Gira was the Project Manager. We also note that AMEC has excellent relations with multiple other local agencies, including the City of Santa Barbara. AMEC's work on the City of Santa Barbara's General Plan EIR, for which Mr. Gira was the Project Manager, was recognized by the Association of Environmental Professionals with the *Outstanding Environmental Analysis Document Award* for 2012, a prestigious statewide award. We strongly believe that both AMEC and Mr. Gira have a reputation for performing outstanding work.

Our goal is to continue to maintain our ongoing excellent relationship with the County and to provide the County with high-quality services. AMEC will carefully monitor the public record and take appropriate action to protect the interests of our firm and its employees.

Respectfully submitted,



Brad Knight
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cc. Michael C. Ghizzoni, County Counsel for Santa Barbara County
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