County of Santa Barbara
BOARD OF SUPERVISORS
Minute Order

August 14, 2018

Present: 5 - Supervisor Williams, Supervisor Wolf, Supervisor Hartmann, Supervisor Adam, and Supervisor Lavagnino

PLANNING AND DEVELOPMENT — File Reference No. 18-00643

RE: Consider recommendations authorizing an Agreement for Services with Aspen Environmental Group to complete a supplement to an Environmental Impact Report (EIR) for the Strauss Wind Energy Project, Third and Fourth Districts, as follows:

a) Approve and authorize the Chair to execute an Agreement for Services of Independent Contractor with Aspen Environmental Group to complete a Supplement to an EIR for the Strauss Wind Energy Project (Project) for the period of August 14, 2018 through August 14, 2020 for a base amount of $310,814.00 and a total contract amount not to exceed $357,436.00;

b) Authorize the Director of Planning and Development, or designee, to approve up to a 15 percent contingency cost not to exceed $46,622.00 for services being performed under the Agreement for a total contract amount not to exceed $357,436.00;

c) Approve and authorize the Director of Planning and Development, or designee, to make immaterial changes in accordance with Section 35 of the Agreement; and

d) Determine that this action is exempt from California Environmental Quality Act pursuant to Section 15378(b)(5), which addresses organizational or administrative activities of governments that will not result in direct or indirect physical changes to the environment.

A motion was made by Supervisor Wolf, seconded by Supervisor Adam, that this matter be Acted on as follows:

a) Approved and authorized; Chair to execute;

b) Authorized;

c) Approved and authorized; and

d) Approved.

The motion carried by the following vote:

Ayes: 5 - Supervisor Williams, Supervisor Wolf, Supervisor Hartmann, Supervisor Adam, and Supervisor Lavagnino

ATTACHMENT 1

AGREEMENT FOR SERVICES OF INDEPENDENT CONTRACTOR

THIS AGREEMENT (hereafter Agreement) is made by and between the County of Santa Barbara, a political subdivision of the State of California (hereafter COUNTY) and Aspen Environmental Group with an address at 5020 Chesebro Road, Suite 200, Agoura Hills, CA 91301 (hereafter CONTRACTOR) wherein CONTRACTOR agrees to provide and COUNTY agrees to accept the services specified herein.

WHEREAS, CONTRACTOR represents that it is specially trained, skilled, experienced, and competent to perform the special services required by COUNTY and COUNTY desires to retain the services of CONTRACTOR pursuant to the terms, covenants, and conditions herein set forth;

NOW, THEREFORE, in consideration of the mutual covenants and conditions contained herein, the parties agree as follows:

1. DESIGNATED REPRESENTATIVE

Kathy Pfeifer at phone number (805) 568-2507 is the representative of COUNTY and will administer this Agreement for and on behalf of COUNTY. Jon Davidson at phone number (818) 338-6665 is the authorized representative for CONTRACTOR. Changes in designated representatives shall be made only after advance written notice to the other party.

2. NOTICES

Any notice or consent required or permitted to be given under this Agreement shall be given to the respective parties in writing, by personal delivery or facsimile, or with postage prepaid by first class mail, registered or certified mail, or express courier service, as follows:

To COUNTY:	Kathy Pfeifer, County of Santa Barbara, Planning & Development Department, 123 E. Anapamu Street, Santa Barbara, CA 93101, kathypm@countyofsb.org, Fax (805) 568-2030
To CONTRACTOR:	Jon Davidson, Aspen Environmental Group, 5020 Chesebro Road, Suite 200, Agoura Hills, CA 91301, jdavidson@aspeneg.com, Fax (818) 597-8001

or at such other address or to such other person that the parties may from time to time designate in accordance with this Notices section. If sent by first class mail, notices and consents under this section shall be deemed to be received five (5) days following their deposit in the U.S. mail. This Notices section shall not be construed as meaning that either party agrees to service of process except as required by applicable law.

3. SCOPE OF SERVICES

CONTRACTOR agrees to provide services to COUNTY in accordance with EXHIBIT A attached hereto and incorporated herein by reference.

4. TERM

CONTRACTOR shall commence performance on August 14, 2018 and end performance upon completion, but no later than August 14, 2020 unless otherwise directed by COUNTY or unless earlier terminated.

5. COMPENSATION OF CONTRACTOR

In full consideration for CONTRACTOR's services, CONTRACTOR shall be paid for performance under this Agreement in accordance with the terms of EXHIBIT B attached hereto and incorporated herein by reference. Billing shall be made by invoice, which shall include the contract number assigned by COUNTY and which is delivered to the address given in Section 2 NOTICES above following completion of the increments identified on EXHIBIT B. Unless otherwise specified on EXHIBIT B, payment shall be net thirty (30) days from presentation of invoice.

6. INDEPENDENT CONTRACTOR

It is mutually understood and agreed that CONTRACTOR (including any and all of its officers, agents, and employees), shall perform all of its services under this Agreement as an independent contractor as to COUNTY and not as an officer, agent, servant, employee, joint venturer, partner, or associate of COUNTY. Furthermore, COUNTY shall have no right to control, supervise, or direct the manner or method by which CONTRACTOR shall perform its work and function. However, COUNTY shall retain the right to administer this Agreement so as to verify that CONTRACTOR is performing its obligations in accordance with the terms and conditions hereof. CONTRACTOR understands and acknowledges that it shall not be entitled to any of the benefits of a COUNTY employee, including but not limited to vacation, sick leave, administrative leave, health insurance, disability insurance, retirement, unemployment insurance, workers' compensation and protection of tenure. CONTRACTOR shall be solely liable and responsible for providing to, or on behalf of, its employees all legally-required employee benefits. In addition, CONTRACTOR shall be solely responsible and save COUNTY harmless from all matters relating to payment of CONTRACTOR's employees, including compliance with Social Security withholding and all other regulations governing such matters. It is acknowledged that during the term of this Agreement, CONTRACTOR may be providing services to others unrelated to the COUNTY or to this Agreement.

7. STANDARD OF PERFORMANCE

CONTRACTOR represents that it has the skills, expertise, and licenses/permits necessary to perform the services required under this Agreement. Accordingly, CONTRACTOR shall perform all such services in the manner and according to the standards observed by a competent practitioner of the same profession in which CONTRACTOR is engaged. All products of whatsoever nature, which CONTRACTOR delivers to COUNTY pursuant to this Agreement, shall be prepared in a first class and workmanlike manner and shall conform to the standards of quality normally observed by a person practicing in CONTRACTOR's profession. CONTRACTOR shall correct or revise any errors or omissions, at COUNTY'S request without additional compensation. Permits and/or licenses shall be obtained and maintained by CONTRACTOR without additional compensation.

8. DEBARMENT AND SUSPENSION

CONTRACTOR certifies to COUNTY that it and its employees and principals are not debarred, suspended, or otherwise excluded from or ineligible for, participation in federal, state, or county government contracts. CONTRACTOR certifies that it shall not contract with a subcontractor that is so debarred or suspended.

9. TAXES

CONTRACTOR shall pay all taxes, levies, duties, and assessments of every nature due in connection with any work under this Agreement and shall make any and all payroll deductions required by law. COUNTY shall not be responsible for paying any taxes on CONTRACTOR's behalf, and should COUNTY be required to do so by state, federal, or local taxing agencies, CONTRACTOR agrees to promptly reimburse COUNTY for the full value of such paid taxes plus interest and penalty, if any. These taxes shall include, but not be limited to, the following: FICA (Social Security), unemployment insurance contributions, income tax, disability insurance, and workers' compensation insurance.

10. **CONFLICT OF INTEREST**

CONTRACTOR covenants that CONTRACTOR presently has no employment or interest and shall not acquire any employment or interest, direct or indirect, including any interest in any business, property, or source of income, which would conflict in any manner or degree with the performance of services required to be performed under this Agreement. CONTRACTOR further covenants that in the performance of this Agreement, no person having any such interest shall be employed by CONTRACTOR. CONTRACTOR must promptly disclose to COUNTY, in writing, any potential conflict of interest. COUNTY retains the right to waive a conflict of interest disclosed by CONTRACTOR if COUNTY determines it to be immaterial, and such waiver is only effective if provided by COUNTY to CONTRACTOR in writing.

11. **OWNERSHIP OF DOCUMENTS AND INTELLECTUAL PROPERTY**

COUNTY shall be the owner of the following items incidental to this Agreement upon production, whether or not completed: all data collected, all documents of any type whatsoever, all photos, designs, sound or audiovisual recordings, software code, inventions, technologies, and other materials, and any material necessary for the practical use of such items, from the time of collection and/or production whether or not performance under this Agreement is completed or terminated prior to completion. CONTRACTOR shall not release any of such items to other parties except after prior written approval of COUNTY.

Unless otherwise specified in Exhibit A, CONTRACTOR hereby assigns to COUNTY all copyright, patent, and other intellectual property and proprietary rights to all data, documents, reports, photos, designs, sound or audiovisual recordings, software code, inventions, technologies, and other materials prepared or provided by CONTRACTOR pursuant to this Agreement (collectively referred to as "Copyrightable Works and Inventions"). COUNTY shall have the unrestricted authority to copy, adapt, perform, display, publish, disclose, distribute, create derivative works from, and otherwise use in whole or in part, any Copyrightable Works and Inventions. CONTRACTOR agrees to take such actions and execute and deliver such documents as may be needed to validate, protect and confirm the rights and assignments provided hereunder. CONTRACTOR warrants that any Copyrightable Works and Inventions and other items provided under this Agreement will not infringe upon any intellectual property or proprietary rights of any third party. CONTRACTOR at its own expense shall defend, indemnify, and hold harmless COUNTY against any claim that any Copyrightable Works or Inventions or other items provided by CONTRACTOR hereunder infringe upon intellectual or other proprietary rights of a third party, and CONTRACTOR shall pay any damages, costs, settlement amounts, and fees (including attorneys' fees) that may be incurred by COUNTY in connection with any such claims. This Ownership of Documents and Intellectual Property provision shall survive expiration or termination of this Agreement.

12. NO PUBLICITY OR ENDORSEMENT

CONTRACTOR shall not use COUNTY's name or logo or any variation of such name or logo in any publicity, advertising or promotional materials. CONTRACTOR shall not use COUNTY's name or logo in any manner that would give the appearance that the COUNTY is endorsing CONTRACTOR. CONTRACTOR shall not in any way contract on behalf of or in the name of COUNTY. CONTRACTOR shall not release any informational pamphlets, notices, press releases, research reports, or similar public notices concerning the COUNTY or its projects, without obtaining the prior written approval of COUNTY.

13. **COUNTY PROPERTY AND INFORMATION**

All of COUNTY's property, documents, and information provided for CONTRACTOR's use in connection with the services shall remain COUNTY's property, and CONTRACTOR shall return any such items whenever requested by COUNTY and whenever required according to the Termination section of this Agreement. CONTRACTOR may use such items only in connection with providing the services. CONTRACTOR shall not disseminate any COUNTY property, documents, or information without COUNTY's prior written consent.

14. **RECORDS, AUDIT, AND REVIEW**

CONTRACTOR shall keep such business records pursuant to this Agreement as would be kept by a reasonably prudent practitioner of CONTRACTOR's profession and shall maintain such records for at least four (4) years following the termination of this Agreement. All accounting records shall be kept in accordance with generally accepted accounting principles. COUNTY shall have the right to audit and review all such documents and records at any time during CONTRACTOR's regular business hours or upon reasonable notice. In addition, if this Agreement exceeds ten thousand dollars ($10,000.00), CONTRACTOR shall be subject to the examination and audit of the California State Auditor, at the request of the COUNTY or as part of any audit of the COUNTY, for a period of three (3) years after final payment under the Agreement (Cal. Govt. Code Section 8546.7). CONTRACTOR shall participate in any audits and reviews, whether by COUNTY or the State, at no charge to COUNTY.

If federal, state or COUNTY audit exceptions are made relating to this Agreement, CONTRACTOR shall reimburse all costs incurred by federal, state, and/or COUNTY governments associated with defending against the audit exceptions or performing any audits or follow-up audits, including but not limited to: audit fees, court costs, attorneys' fees based upon a reasonable hourly amount for attorneys in the community, travel costs, penalty assessments and all other costs of whatever nature. Immediately upon notification from COUNTY, CONTRACTOR shall reimburse the amount of the audit exceptions and any other related costs directly to COUNTY as specified by COUNTY in the notification.

15. **INDEMNIFICATION AND INSURANCE**

CONTRACTOR agrees to the indemnification and insurance provisions as set forth in EXHIBIT C attached hereto and incorporated herein by reference.

16. **NONDISCRIMINATION**

COUNTY hereby notifies CONTRACTOR that COUNTY's Unlawful Discrimination Ordinance (Article XIII of Chapter 2 of the Santa Barbara County Code) applies to this Agreement and is incorporated herein by this reference with the same force and effect as if the ordinance were specifically set out herein and CONTRACTOR agrees to comply with said ordinance.

17. **NONEXCLUSIVE AGREEMENT**

CONTRACTOR understands that this is not an exclusive Agreement and that COUNTY shall have the right to negotiate with and enter into contracts with others providing the same or similar services as those provided by CONTRACTOR as the COUNTY desires.

18. **NON-ASSIGNMENT**

CONTRACTOR shall not assign, transfer or subcontract this Agreement or any of its rights or obligations under this Agreement without the prior written consent of COUNTY and any attempt to so assign, subcontract or transfer without such consent shall be void and without legal effect and shall constitute grounds for termination.

19. **TERMINATION**

A. By COUNTY. COUNTY may, by written notice to CONTRACTOR, terminate this Agreement in whole or in part at any time, whether for COUNTY's convenience, for nonappropriation of funds, or because of the failure of CONTRACTOR to fulfill the obligations herein.

1. **For Convenience**. COUNTY may terminate this Agreement in whole or in part upon thirty (30) days written notice. During the thirty (30) day period, CONTRACTOR shall, as directed by COUNTY, wind down and cease its services as quickly and efficiently as reasonably possible, without performing

unnecessary services or activities and by minimizing negative effects on COUNTY from such winding down and cessation of services.

2. **For Nonappropriation of Funds.** Notwithstanding any other provision of this Agreement, in the event that no funds or insufficient funds are appropriated or budgeted by federal, state or COUNTY governments, or funds are not otherwise available for payments in the fiscal year(s) covered by the term of this Agreement, then COUNTY will notify CONTRACTOR of such occurrence and COUNTY may terminate or suspend this Agreement in whole or in part, with or without a prior notice period. Subsequent to termination of this Agreement under this provision, COUNTY shall have no obligation to make payments with regard to the remainder of the term.

3. **For Cause.** Should CONTRACTOR default in the performance of this Agreement or materially breach any of its provisions, COUNTY may, at COUNTY's sole option, terminate or suspend this Agreement in whole or in part by written notice. Upon receipt of notice, CONTRACTOR shall immediately discontinue all services affected (unless the notice directs otherwise) and notify COUNTY as to the status of its performance. The date of termination shall be the date the notice is received by CONTRACTOR, unless the notice directs otherwise.

B. By CONTRACTOR. Should COUNTY fail to pay CONTRACTOR all or any part of the payment set forth in EXHIBIT B, CONTRACTOR may, at CONTRACTOR's option terminate this Agreement if such failure is not remedied by COUNTY within thirty (30) days of written notice to COUNTY of such late payment.

C. Upon termination, CONTRACTOR shall deliver to COUNTY all data, estimates, graphs, summaries, reports, and all other property, records, documents or papers as may have been accumulated or produced by CONTRACTOR in performing this Agreement, whether completed or in process, except such items as COUNTY may, by written permission, permit CONTRACTOR to retain. Notwithstanding any other payment provision of this Agreement, COUNTY shall pay CONTRACTOR for satisfactory services performed to the date of termination to include a prorated amount of compensation due hereunder less payments, if any, previously made. In no event shall CONTRACTOR be paid an amount in excess of the full price under this Agreement nor for profit on unperformed portions of service. CONTRACTOR shall furnish to COUNTY such financial information as in the judgment of COUNTY is necessary to determine the reasonable value of the services rendered by CONTRACTOR. In the event of a dispute as to the reasonable value of the services rendered by CONTRACTOR, the decision of COUNTY shall be final. The foregoing is cumulative and shall not affect any right or remedy which COUNTY may have in law or equity.

20. **SECTION HEADINGS**

The headings of the several sections, and any Table of Contents appended hereto, shall be solely for convenience of reference and shall not affect the meaning, construction or effect hereof.

21. **SEVERABILITY**

If any one or more of the provisions contained herein shall for any reason be held to be invalid, illegal or unenforceable in any respect, then such provision or provisions shall be deemed severable from the remaining provisions hereof, and such invalidity, illegality or unenforceability shall not affect any other provision hereof, and this Agreement shall be construed as if such invalid, illegal or unenforceable provision had never been contained herein.

22. **REMEDIES NOT EXCLUSIVE**

No remedy herein conferred upon or reserved to COUNTY is intended to be exclusive of any other remedy or remedies, and each and every such remedy, to the extent permitted by law, shall be cumulative and in addition to any other remedy given hereunder or now or hereafter existing at law or in equity or otherwise.

23. **TIME IS OF THE ESSENCE**

Time is of the essence in this Agreement and each covenant and term is a condition herein.

24. **NO WAIVER OF DEFAULT**

No delay or omission of COUNTY to exercise any right or power arising upon the occurrence of any event of default shall impair any such right or power or shall be construed to be a waiver of any such default or an acquiescence therein; and every power and remedy given by this Agreement to COUNTY shall be exercised from time to time and as often as may be deemed expedient in the sole discretion of COUNTY.

25. **ENTIRE AGREEMENT AND AMENDMENT**

In conjunction with the matters considered herein, this Agreement contains the entire understanding and agreement of the parties and there have been no promises, representations, agreements, warranties or undertakings by any of the parties, either oral or written, of any character or nature hereafter binding except as set forth herein. This Agreement may be altered, amended or modified only by an instrument in writing, executed by the parties to this Agreement and by no other means. Each party waives their future right to claim, contest or assert that this Agreement was modified, canceled, superseded, or changed by any oral agreements, course of conduct, waiver or estoppel.

26. **SUCCESSORS AND ASSIGNS**

All representations, covenants and warranties set forth in this Agreement, by or on behalf of, or for the benefit of any or all of the parties hereto, shall be binding upon and inure to the benefit of such party, its successors and assigns.

27. **COMPLIANCE WITH LAW**

CONTRACTOR shall, at its sole cost and expense, comply with all County, State and Federal ordinances and statutes now in force or which may hereafter be in force with regard to this Agreement. The judgment of any court of competent jurisdiction, or the admission of CONTRACTOR in any action or proceeding against CONTRACTOR, whether COUNTY is a party thereto or not, that CONTRACTOR has violated any such ordinance or statute, shall be conclusive of that fact as between CONTRACTOR and COUNTY.

28. **CALIFORNIA LAW AND JURISDICTION**

This Agreement shall be governed by the laws of the State of California. Any litigation regarding this Agreement or its contents shall be filed in the County of Santa Barbara, if in state court, or in the federal district court nearest to Santa Barbara County, if in federal court.

29. **EXECUTION OF COUNTERPARTS**

This Agreement may be executed in any number of counterparts and each of such counterparts shall for all purposes be deemed to be an original; and all such counterparts, or as many of them as the parties shall preserve undestroyed, shall together constitute one and the same instrument.

30. **AUTHORITY**

All signatories and parties to this Agreement warrant and represent that they have the power and authority to enter into this Agreement in the names, titles and capacities herein stated and on behalf of any entities, persons, or firms represented or purported to be represented by such entity(ies), person(s), or firm(s) and that all formal requirements necessary or required by any state and/or federal law in order to enter into this Agreement have been fully complied with. Furthermore, by entering into this Agreement, CONTRACTOR hereby warrants that it shall not have breached the terms or conditions of any other contract or agreement to which CONTRACTOR is obligated, which breach would have a material effect hereon.

31. **SURVIVAL**

All provisions of this Agreement which by their nature are intended to survive the termination or expiration of this Agreement shall survive such termination or expiration.

32. **PRECEDENCE**

In the event of conflict between the provisions contained in the numbered sections of this Agreement and the provisions contained in the Exhibits, the provisions of the numbered sections of this Agreement shall prevail over those in the Exhibits.

33. **SUBCONTRACTORS**

CONTRACTOR is authorized to subcontract with subcontractors identified in Contractor's Proposal. CONTRACTOR shall be fully responsible for all services performed by its subcontractor. CONTRACTOR shall secure from its subcontractor all rights for COUNTY in this Agreement, including audit rights.

34. **HANDLING OF PROPRIETARY INFORMATION**

CONTRACTOR understands and agrees that certain materials which may be provided by COUNTY may be classified and conspicuously labeled as proprietary confidential information. That material is to be subject to the following special provisions:

A. All reasonable steps will be taken to prevent disclosure of the material to any person except those personnel of CONTRACTOR working on the project who have a need to use the material.

B. Upon conclusion of CONTRACTOR'S work, CONTRACTOR shall return all copies of the material direct to party providing such material. CONTRACTOR shall contact COUNTY to obtain the name of the specific party authorized to receive the material.

35. **IMMATERIAL CHANGES**

CONTRACTOR and COUNTY agree that immaterial changes to the Statement of Work (time frame and mutually agreeable Statement of Work changes which will not result in a change to the total contract amount) may be authorized by Planning and Development Director, or designee in writing, and will not constitute an amendment to the Agreement.

36. **NEWS RELEASES/INTERVIEWS**

CONTRACTOR agrees for itself, its agents, employees and subcontractors, it will not communicate with representatives of the communications media concerning the subject matter of this Agreement without prior written approval of the COUNTY Project Coordinator. CONTRACTOR further agrees that all media requests for communication will be referred to COUNTY'S responsible personnel.

Agreement for Services of Independent Contractor between the **County of Santa Barbara** and **Aspen Environmental Group.**

IN WITNESS WHEREOF, the parties have executed this Agreement to be effective on the date executed by COUNTY.

ATTEST:

Mona Miyasato
County Executive Officer
Clerk of the Board

By: _____
Deputy Clerk

COUNTY OF SANTA BARBARA:

By: _____
Chair, Board of Supervisors

Date: 8/14/18

RECOMMENDED FOR APPROVAL:

Dianne M. Black, Director
Planning & Development

By: _____
Department Head

CONTRACTOR:

Jon Davidson, Project Manager
Aspen Environmental Group

By: _____
Authorized Representative

Name: Jon Davidson

Title: Vice President

APPROVED AS TO FORM:

Michael C. Ghizzoni
County Counsel

By: _____
Deputy County Counsel

APPROVED AS TO ACCOUNTING FORM:

Theodore A. Fallati, CPA
Auditor-Controller

By: _____
Deputy

APPROVED AS TO FORM:

Risk Management

By: _____
Risk Management

ATTACHMENT 1
EXHIBIT A

STATEMENT OF WORK

CONTRACTOR shall render services in accordance with the Proposal for Preparation of the Strauss Wind Energy Project Supplement to the Environmental Impact Report (SEIR), as shown in Appendix 1 and incorporated herein by reference. The Proposal describes the SEIR scope of work which includes the following: consultant qualifications and experience, key personnel and project management program, study methodology, document preparation, project schedule, and cost estimate.

Jon Davidson, Stanley Yeh, Vida Strong, Scott White, Jennifer Lancaster, William Walters, Brewster Birdsall, Phillip Lowe, Michael Macko, Joseph Stewart, Tatiana Inouye, and Patrick Meddaugh of Aspen Environmental Group, Michael Clayton of Michael Clayton & Associates, Jim Thurber and Aurie Patterson of Geotechnical Consultants, Inc., and Richard Garland of Garland Associates, shall be the individual(s) personally responsible for providing all services hereunder. CONTRACTOR may not substitute other persons without the prior written approval of COUNTY's designated representative.

Suspension for Convenience. COUNTY may, without cause, order CONTRACTOR in writing to suspend, delay, or interrupt the services under this Agreement in whole or in part for up to 30 days. COUNTY shall incur no liability for suspension under this provision and suspension shall not constitute a breach of this Agreement.

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ATTACHMENT 1
EXHIBIT B

PAYMENT ARRANGEMENTS
Periodic Compensation at Selected Milestones

A. For CONTRACTOR services to be rendered under this Agreement, CONTRACTOR shall be paid a total contract amount, including cost reimbursements, not to exceed $310,814.00 with a contingency amount of $46,622.00 for a total contract amount up to $357,436.00. Contingency expenditures shall be approved in advance by the County.

B. Payment for services and/or reimbursement of costs shall be made upon CONTRACTOR's satisfactory performance, based upon the scope and methodology contained in Appendix 1 (Aspen Technical Proposal) as determined by COUNTY.

C. Upon completion of the work for each milestone and/or delivery to COUNTY of item(s) specified below, CONTRACTOR shall submit to the COUNTY DESIGNATED REPRESENTATIVE an invoice or certified claim on the County Treasury for the service performed in accomplishing each milestone. These invoices or certified claims must cite the assigned Board Contract Number. COUNTY DESIGNATED REPRESENTATIVE shall evaluate the quality of the service performed and/or item(s) delivered and if found to be satisfactory shall initiate payment processing. COUNTY shall pay invoices or claims for satisfactory work within 30 days of receipt of correct and complete invoices or claims from CONTRACTOR.

Percentage of Total Contract Amount	Milestone Description	Maximum Amount Chargeable
64%	Administrative Draft SEIR	$197,520
13%	Public Draft SEIR	$41,063
20%	Proposed Final SEIR	$64,172
3%	Final SEIR	$8,059

The final milestone payment above shall not be made until all services have been completed and item(s) as specified in EXHIBIT A and in Appendix 1 have been delivered and found to be satisfactory.

D. COUNTY's failure to discover or object to any unsatisfactory work or billings prior to payment will not constitute a waiver of COUNTY's right to require CONTRACTOR to correct such work or billings or seek any other legal remedy.

ATTACHMENT 1
EXHIBIT C

Indemnification and Insurance Requirements (For Professional Contracts)

INDEMNIFICATION

CONTRACTOR agrees to indemnify, defend (with counsel reasonably approved by COUNTY) and hold harmless COUNTY and its officers, officials, employees, agents and volunteers from and against any and all claims, actions, losses, damages, judgments and/or liabilities arising out of this Agreement from any cause whatsoever, including the acts, errors or omissions of any person or entity and for any costs or expenses (including but not limited to attorneys' fees) incurred by COUNTY on account of any claim except where such indemnification is prohibited by law. CONTRACTOR's indemnification obligation applies to COUNTY's active as well as passive negligence but does not apply to COUNTY's sole negligence or willful misconduct.

NOTIFICATION OF ACCIDENTS AND SURVIVAL OF INDEMNIFICATION PROVISIONS

CONTRACTOR shall notify COUNTY immediately in the event of any accident or injury arising out of or in connection with this Agreement. The indemnification provisions in this Agreement shall survive any expiration or termination of this Agreement.

INSURANCE

CONTRACTOR shall procure and maintain for the duration of this Agreement insurance against claims for injuries to persons or damages to property which may arise from or in connection with the performance of the work hereunder and the results of that work by the CONTRACTOR, his agents, representatives, employees or subcontractors.

A. Minimum Scope of Insurance Coverage shall be at least as broad as:

1. **Commercial General Liability (CGL):** Insurance Services Office (ISO) Form CG 00 01 covering CGL on an "occurrence" basis, including products-completed operations, personal & advertising injury, with limits no less than $1,000,000 per occurrence and $2,000,000 in the aggregate.
2. **Automobile Liability**: ISO Form Number CA 00 01 covering any auto (Code 1), or if CONTRACTOR has no owned autos, hired, (Code 8) and non-owned autos (Code 9), with limit no less than $1,000,000 per accident for bodily injury and property damage.
3. **Workers' Compensation**: as required by the State of California, with Statutory Limits, and Employer's Liability Insurance with limit of no less than $1,000,000 per accident for bodily injury or disease.
4. **Professional Liability** (Errors and Omissions) Insurance appropriate to the CONTRACTOR'S profession, with limit of no less than $1,000,000 per occurrence or claim, $2,000,000 aggregate.

If the CONTRACTOR maintains higher limits than the minimums shown above, the COUNTY requires and shall be entitled to coverage for the higher limits maintained by the CONTRACTOR. Any available insurance proceeds in excess of the specified minimum limits of insurance and coverage shall be available to the COUNTY.

B. Other Insurance Provisions

The insurance policies are to contain, or be endorsed to contain, the following provisions:

1. **Additional Insured** – COUNTY, its officers, officials, employees, agents and volunteers are to be covered as additional insureds on the CGL policy with respect to liability arising out of work or operations performed by or on behalf of the CONTRACTOR including materials, parts, or equipment furnished in connection with such work or operations. General liability coverage can be provided in the form of an endorsement to the CONTRACTOR's insurance at least as broad as ISO Form CG 20 10 11 85 or if not available, through the addition of both CG 20 10 and CG 20 37 if a later edition is used).

2. **Primary Coverage** – For any claims related to this Agreement, the CONTRACTOR's insurance coverage shall be primary insurance as respects the COUNTY, its officers, officials, employees, agents and volunteers. Any insurance or self-insurance maintained by the COUNTY, its officers, officials, employees, agents or volunteers shall be excess of the CONTRACTOR's insurance and shall not contribute with it.

3. **Notice of Cancellation** – Each insurance policy required above shall provide that coverage shall not be canceled, except with notice to the COUNTY.

4. **Waiver of Subrogation Rights** – CONTRACTOR hereby grants to COUNTY a waiver of any right to subrogation which any insurer of said CONTRACTOR may acquire against the COUNTY by virtue of the payment of any loss under such insurance. CONTRACTOR agrees to obtain any endorsement that may be necessary to effect this waiver of subrogation, but this provision applies regardless of whether or not the COUNTY has received a waiver of subrogation endorsement from the insurer.

5. **Deductibles and Self-Insured Retention** – Any deductibles or self-insured retentions must be declared to and approved by the COUNTY. The COUNTY may require the CONTRACTOR to purchase coverage with a lower deductible or retention or provide proof of ability to pay losses and related investigations, claim administration, and defense expenses within the retention.

6. **Acceptability of Insurers** – Unless otherwise approved by Risk Management, insurance shall be written by insurers authorized to do business in the State of California and with a minimum A.M. Best's Insurance Guide rating of "A- VII".

7. **Verification of Coverage** – CONTRACTOR shall furnish the COUNTY with proof of insurance, original certificates and amendatory endorsements as required by this Agreement. The proof of insurance, certificates and endorsements are to be received and approved by the COUNTY before work commences. However, failure to obtain the required documents prior to the work beginning shall not waive the CONTRACTOR's obligation to provide them. The CONTRACTOR shall furnish evidence of renewal of coverage throughout the term of the Agreement. The COUNTY reserves the right to require complete, certified copies of all required insurance policies, including endorsements required by these specifications, at any time.

8. **Failure to Procure Coverage** – In the event that any policy of insurance required under this Agreement does not comply with the requirements, is not procured, or is canceled and not replaced, COUNTY has the right but not the obligation or duty to terminate the Agreement. Maintenance of required insurance coverage is a material element of the Agreement and failure to maintain or renew such coverage or to provide evidence of renewal may be treated by COUNTY as a material breach of contract.

9. **Subcontractors** – CONTRACTOR shall require and verify that all subcontractors maintain insurance meeting all the requirements stated herein, and CONTRACTOR shall ensure that COUNTY is an additional insured on insurance required from subcontractors.

10. **Claims Made Policies** – If any of the required policies provide coverage on a claims-made basis:
    i. The Retroactive Date must be shown and must be before the date of the contract or the beginning of contract work.
    ii. Insurance must be maintained and evidence of insurance must be provided for at least five (5) years after completion of contract work.
    iii. If coverage is canceled or non-renewed, and not replaced with another claims-made policy form with a Retroactive Date prior to the contract effective date, the CONTRACTOR must purchase "extended reporting" coverage for a minimum of five (5) years after completion of contract work.

11. **Special Risks or Circumstances** – COUNTY reserves the right to modify these requirements, including limits, based on the nature of the risk, prior experience, insurer, coverage, or other special circumstances.

Any change requiring additional types of insurance coverage or higher coverage limits must be made by amendment to this Agreement. CONTRACTOR agrees to execute any such amendment within thirty (30) days of receipt.

Any failure, actual or alleged, on the part of COUNTY to monitor or enforce compliance with any of the insurance and indemnification requirements will not be deemed as a waiver of any rights on the part of COUNTY.

1. Introduction

Aspen Environmental Group understands wind energy. Aspen has analyzed over 8,000 megawatts (MW) of wind energy projects in California, including some of the largest wind energy projects in the state. Aspen also has a long history of work in Santa Barbara County, including specific experience at the site of proposed Strauss Wind Energy Project (SWEP) as this is the site of former Lompoc Wind Energy Project (LWEP) for which Aspen prepared the Final Environmental Impact Report (EIR) on behalf of the County. Aspen's depth of experience with wind energy projects and CEQA is fully described in Sections 2 and 3 of this proposal. Few, if any, firms can match Aspen's experience in conducting CEQA (and NEPA) analysis for wind energy projects in California.

This section provides a summary of Aspen's understanding of the proposed SWEP and presents an overview of our approach to conducting supplemental CEQA analysis for the project. A more complete description of our approach is presented in the Study Methodology section of this proposal. This section also introduces the subcontractors on the Aspen team.

1.1 Project Understanding

The County has determined that the proposed SWEP will require the preparation of a supplement to the EIR prepared for the LWEP EIR, which was finalized in 2008. The EIR Supplement will analyze the construction and operation of a wind energy project broadly similar to the project previously analyzed in the LWEP Final EIR. The EIR Supplement will contain the information necessary to make the previous EIR adequate for the SWEP and meet the requirements for supplemental analysis under State CEQA Guidelines Section 15163. The EIR Supplement will address all the environmental issue areas identified in Appendix G of the CEQA Guidelines but focus on those determined in the previous EIR to have potentially significant impacts. In addition to an analysis of potential impacts, the EIR Supplement will also include a comparison of the impacts of the SWEP and the previous impacts identified in the LWEP Final EIR.

The proposed SWEP is located on approximately 2,950 acres of rural agricultural land on the coastal ridges southwest of the City of Lompoc. The SWEP includes the installation of 30 wind turbine generators (WTGs) as well as ancillary infrastructure, including an 8.6-mile, 115-kV power line that would connect the SWEP's new onsite substation to the PG&E Cabrillo Substation.

As described in materials provided with the RFP, the SWEP would include the following major components.

- Construction and operation of up to 30 WTGs:
  - Six (6) 1.79-MW WTG
  - Twenty-four (24) 3.8-MW WTG
- 14.3 miles of new access roads and 16.1 miles of improvements to existing access roads at the windfarm site and along the transmission line.
- Modifications, including widening, to San Miguelito Road to permit transport of the 213-foot-long WTG blades.
- Installation and operation of a fiber-optic communication system and three (3) 295-foot permanent meteorological towers.
- Construction of an onsite electrical collection system and a 2-acre project substation.
- Construction of an 8.6-mile, 115-kV power line connecting the onsite substation to the PG&E Cabrillo Substation, and upgrades to the PG&E substation for interconnection.

The major differences between the SWEP and the LWEP as analyzed in the previous 2009 EIR include:

- Changes to the size, number, and locations of WTGs:
  - The LWEP proposed to install sixty-five (65) 1.5-MW WTGs, while the SWEP would install 30 WTGs, including six (6) 1.79-MW and twenty-four (24) 3.8-MW WTGs. No WTGs would be located in the Coastal Zone.
- The layout of the access roads and other project components has shifted to accommodate the needs of nearby sensitive receptors and Vandenberg Air Force Base, to increase turbine efficiency, and to reduce impacts on sensitive resources.
- Changes in the grading volumes and location:
  - The SWEP would cut and fill a larger volume of earth, but the majority of that would be balanced on site, for a net increase of approximately 5,000 cubic yards over the previously analyzed LWEP.
  - 12.1 acres of grading in the Coastal Zone would require the need for a Coastal Development Permit, and was not analyzed as part of the LWEP Final EIR.
- Substantial modifications to San Miguelito Road.
  - These modifications were not analyzed as part of the previous LWEP Final EIR.
- Changes in the northern section of the proposed 115-kV power line.
  - The SWEP does not follow the "environmentally superior alternative" identified in the previous LWEP Final EIR.

A summary of the similarities and differences between the SWEP and the previously analyzed LWEP is presented in Table 1, LWEP-SWEP Comparison, below.

Table 1. LWEP-SWEP Comparison

Project Characteristics	Approved Lompoc Wind Energy Project	Proposed Strauss Wind Energy Project	Change
Project Site Disturbance, excluding Transmission Lines			
Permanent Site Disturbance	40.2 acres	71.54 acres (30.46 acres of transmission access road)	+31.34 acres
Temporary Site Disturbance	195.7 acres	158.28 acres (43.50 acres of transmission access road)	-37.42 acres
Total site disturbance	235.9 acres	229.82 acres	-6.08 acres
Total Site Disturbance as a percentage of total Project Area (2,899 acres, excluding transmission line)	8%	5%	-3%
Transmission Line			
Distance	8.7 miles	8.6 miles	-0.1 mile
Voltage	115 kV	115 kV	--
Pole Type	Wood/Steel	Wood/Steel	--
Pole Height	75-80 feet	75 Feet	-5 - 0 feet
Total Earthwork/Grading Volumes			
Cut (cubic yards)	219,000	665,025	+446,025
Fill (cubic yards)	182,000	623,023	+441,023
Net Change (cubic yards)	37,000	42,000	+5,000

Table 1. LWEP-SWEP Comparison			
Project Characteristics	**Approved Lompoc Wind Energy Project**	**Proposed Strauss Wind Energy Project**	**Change**
Impervious Surface			
New Impervious Surface	2.35 acres	2.28 acres	-0.07 acres
Road Improvements			
Improvements to Existing Access Roads	8.3 Miles	2.6 miles	-5.7 miles
New Access Roads (including transmission line)	5.5 miles	14.3 miles	+8.8 miles
Wind Turbine Generators (WTGs)			
Total number of WTGs	65	30	-35
Type of WTG	WTG Model 1	GE WTG Model	--
MW WTG	1.5 MW	1.79 MW	+0.29 MW
		3.8 MW	+2.3 MW
Number of WTG by model	65 x 1.5 MW	6 x 1.79 MW	--
		24 x 3.8 MW	
Total Capacity (MW)	97.5 MW	101.7 MW	+4.2 MW
Estimated Capacity Factor	33%	34%	+1%
Expected Production (MWh)	285,000 (285 GWh)	302,903 (302 GWh)	+17,903 MWh (+17 GWh)
Annual Home Supply	42,600	44,700	+2,100
Total Height of WTG (foundation to blade tip)	389-397 Feet (119-121 meters)	1.79 MW; 427 Feet (130 meters)	+30-38 feet (9-11 meters)
		3.8 MW, 492 Feet (150 meters)	+95-103 feet (29-31 meters)
Construction Truck Trips			
Total Truck Trips	12,270	16,189	+3,919
Construction Duration	6 months	10 months	+4 months
Minimum Trips Per Month	560	200	-360
Minimum Trips Per Day (22 Construction Days/Month)	25	9	-16
Maximum Trips Per Month	3,976	2,361	+1,615
Maximum Trips Per Day (22 Construction Days/Month)	181	107	-74
Average Trips Per Month	2,045	1,799	-246
Average Trips Per Day (22 Construction Days/Month)	93	82	-11
Phases of Construction	3 phases	1 phase	-2
Peak Worker Count	50-100	50-100	--
Substation Facility			
Permanent Disturbance	2.0 Acres	2.02 Acres	+0.02 acres
Temporary Disturbance	2.0 Acres	0.0 Acres	-2.0 acres
Meteorological Towers			
Tower Count	10 (2 permanent)	4 (3 permanent)	-6 (+1 permanent)
Tower Height	197-262 feet	197-295 feet	0-+33 feet

Table 1. LWEP-SWEP Comparison			
Project Characteristics	**Approved Lompoc Wind Energy Project**	**Proposed Strauss Wind Energy Project**	**Change**
Required and Potential Permits			
County of Santa Barbara	Conditional Use Permit 1 Variance	Conditional Use Permit 2 Variances Coastal Development Permit	+1 Variance +CDP
California Department of Fish and Wildlife	Streambed Alteration Agreement (1602) State-Listed Species Impacts (2081 Permit)	Streambed Alteration Agreement (1602) State-Listed Species Impacts (2081 Permit)	--
California Department of Transportation	Encroachment Permit Hauling Truck and Overload Permits Approve Road Closures	Encroachment Permit Hauling Truck and Overload Permits Approve Road Closures	--
Central Coast Regional Water Quality Control Board	Section 401 Permit Industrial National Pollutant Discharge Elimination System (NPDES) General Construction Stormwater Permit (SWPPP)	Section 401 Permit Industrial National Pollutant Discharge Elimination System (NPDES) General Construction Stormwater Permit (SWPPP)	--
City of Lompoc	Encroachment Permits Approval of Traffic Control Plan	Encroachment Permits Approval of Traffic Control Plan	--
Federal Aviation Administration	Consultation regarding Projects impact to air navigation Review and approve Lift Plan and WTG Lighting Plan	Consultation regarding Projects impact to air navigation Review and approve Lift Plan and WTG Lighting Plan	--
U.S. Army Corps of Engineers	Section 404 Nationwide Permit	Section 404 Nationwide Permit	--
U.S. Fish and Wildlife Service	Potential Section 7 Consultation	Potential Section 7 Consultation	--

1.2 Approach

An appropriate approach for CEQA compliance for a proposed project is based on multiple factors. If a project triggers review under CEQA, the primary consideration in determining the type of CEQA compliance document that needs to be prepared is the potential for the project to cause significant impacts to the environment. This determination is guided by the State CEQA Guidelines and the County's Environmental Thresholds and Guidelines Manual. The approach to preparing the CEQA document is also influenced by public concern, controversy, and issues raised by responsible and trustee agencies.

Other factors also influence the approach to preparing the EIR Supplement for the proposed SWEP. These include:

- **Unique Impacts and Issues Associated with Wind Energy Projects.** There are unique issues and impacts associated with wind energy projects that need to be revisited in the EIR Supplement. These include issues such as turbine noise, avian and bat mortality, interference with aviation, icing and blade throw, turbine fires, potential health effects, and electric and magnetic fields. Aspen has extensive experience addressing all of the various impacts associated with wind energy projects.
- **Unique Conditions at the Project Site.** The project site is located in a hilly area southwest of the City of Lompoc that is characterized by ranches, farms, scattered rural residences, and natural open

space. The site overlaps the coastal zone and is close to Vandenberg Air Force Base. The area also contains habitat for sensitive plant and wildlife species. The unique characteristics of the project area make it necessary to thoughtfully update information on the environmental setting, especially considering that the previous EIR was prepared ten years ago.

- **Concerns of the Public, Decision Makers, and Responsible and Trustee Agencies.** Largely due to their unique characteristics, including their height and visibility, members of the public often have multiple concerns about wind turbine generators proposed near them. Many of these concerns are well founded, others less so. Resource agencies, such as the California Department of Fish and Game and Coastal Commission, have concerns about the effects of wind turbine generators on the resources they are charged with protecting. The EIR Supplement must carefully address all of these concerns by providing thorough and objective information that helps the public, decision makers, and other agencies better understand these issues.
- **Best Practices in Mitigating Impacts from Wind Turbines.** As many new wind energy projects have been built and put into operation over the last decade, the impacts of these projects have become more well understood. This accumulated knowledge needs to be reflected in the EIR Supplement, particularly information regarding current best practices for mitigating impacts that are common to wind energy projects, such avian and bat mortality effects. Whether previous mitigation measures from the LWEP Final EIR need to be carried forward, revised, or supplemented will be a primary focus of Aspen's approach to preparing the EIR Supplement for the proposed SWEP.
- **Supplemental Analysis under CEQA.** The approach to preparing the EIR Supplement is affected by the fact that the document will be supplementing a previous EIR. Therefore, the EIR Supplement will need to build upon and update the information and analysis in the original EIR as described below.

Supplemental CEQA Analysis

For the proposed SWEP, the County has made the determination that the project would likely result in significant environmental impacts and this determination is supported by the fact that an EIR was previously prepared for the project site for a similar project. As a result, preparation of an EIR is warranted, but because an EIR was previously prepared, the EIR for the proposed project will take the form of an EIR Supplement as described in Section 15163 of the State CEQA Guidelines. The procedural requirements for an EIR Supplement are the same as a conventional EIR, but the content can be streamlined because an EIR Supplement need only contain information necessary to make the previous EIR adequate for the revised project. Therefore, the EIR Supplement for the SWEP will utilize, build upon, and modify the information in the previous EIR for the LWEP in order to make it current and applicable for the SWEP.

Supplement Approach

- *Peer review and supplement applicant's technical studies.*
- *Update the environmental setting.*
- *Re-evaluate impacts and revise, tailor, or expand as needed.*
- *Update, refine, and tailor mitigation measures as needed.*
- *Streamline by referring reader to the original EIR where appropriate.*

For the EIR Supplement, information on existing environmental conditions at and surrounding the project site will need to be updated, the analysis of impacts will need to be revised to fit the proposed SWEP, and mitigation measures will need to be modified to reflect current information about impacts. This includes incorporating best practices developed in recent years to address the unique impacts associated with wind energy projects.

The updated environmental setting for the proposed SWEP will be compiled using a combination of information in the LWEP Final EIR, information in the applicant's technical

studies, and new research and field work conducted by the Aspen Team. A critical peer review of the applicant's technical studies is an important part of the approach for developing the environmental setting for the EIR Supplement. Aspen will utilize experienced senior professionals in the appropriate disciplines to conduct this peer review. Any deficiencies will be reported to the County along with recommendations for correcting or supplementing information to provide an adequate basis for describing existing environmental conditions. Aspen will made use of existing available and relevant information to the degree feasible in order to streamline the effort for the preparing the environmental setting for the EIR Supplement.

Each of the impacts in the LWEP Final EIR will be thoughtfully re-evaluated for the SWEP EIR Supplement. This re-evaluation is necessary due to the differences in the SWEP compared to the LWEP and because knowledge about the environmental impacts of wind energy projects has expanded over the last ten years. However, the discussion of impacts will only be revised or expanded as necessary to provide a complete and objective analysis of the SWEP impacts, and will utilize and build upon the previous analysis as appropriate. This approach is consistent with the intent of supplemental analysis under CEQA.

In the ten years since the LWEP Final EIR was published, the approach to mitigation for some types of impacts has been refined, such as approaches for mitigating bird and bat collisions with wind turbines. In general, mitigation measures will need to be tailored to address the specific impacts of the proposed SWEP and updated to reflect current best practices for reducing significant impacts.

Scope of Analysis

As stated in the RFP (page 4), the EIR Supplement will address all environmental issue areas identified in Appendix G of the CEQA Guidelines. The focus of the EIR Supplement will be the impacts that are potentially significant. The LWEP Final EIR will be the starting point for identifying significant impacts associated with the SWEP. For issue areas for which there is not potential for significant impacts, the EIR Supplement will provide an explanation for these conclusions and will not analyze these effects in detail, thereby streamlining the EIR Supplement. It is anticipated that significant adverse impacts are not likely to be associated with energy, mineral resources, population/housing, public services, recreation, or utilities and service systems. If any impacts identified in the LWEP Final EIR would be completely unchanged for the proposed SWEP, the EIR Supplement will explain these conclusion, briefly summarize the impacts, and refer the reader for the full explanation of the impact in the original EIR. If only minor revisions or expansions of previous impacts are needed for the SWEP, the EIR Supplement will summarize the previous impact analysis, provide the necessary revised or expanded information, and refer the reader back to the original EIR for additional information.

It is anticipated that the LWEP Final EIR will provide information that addresses many of the impacts associated with the proposed SWEP, but that substantial customizing of impact discussions will be needed to tailor the analysis to the proposed project. Similarly, mitigation measures will need to be refined and update and it's possible that new measures will need to be proposed.

Issues and Impacts

The Study Methodology section of this proposal provides a full description of the tasks to be accomplished in preparation of the SWEP EIR Supplement, including descriptions of Aspen's approach to compiling environmental baseline information and conducting impact analysis for each resource and issue area. An overview of the issues and impacts to be addressed in the EIR Supplement is provided below.

- **Aesthetics/Visual Resources.** Wind energy projects are highly visible and that characteristic is often the basis for much public concern. Based on a preliminary digital terrain analysis of the proposed project and review of the LWEP Final EIR and VRTR, a number of potential issues have been

identified. It is clear that elements of the proposed SWEP will be more visible than the previous LWEP and that will need to adequately characterized in the EIR Supplement. In addition, from some Key Observation Points (KOPs), a preliminary analysis indicates that elements of the project would also be more visible than indicated in the applicant's Visual Resources Technical Report. We recommend preparation of simulations from certain new or revised KOPs in order to better characterize the visual impacts of the proposed SWEP.

- **Agriculture and Forestry Resources.** The SWEP site and surrounding area do not contain forest land or forestry resources. As such, this analysis will focus on agriculture, specifically Farmland conversion and potential conflicts with zoning for agricultural use or Williamson Act contracts.
- **Air Quality.** An initial review of the emissions estimate presented in the applicant's Air Quality and Greenhouse Gas Emissions Technical Report indicates that many on-road vehicle types have been misclassified as off-road equipment (dump trucks, concrete trucks, pickup trucks, and line trucks), which overestimates the off-road equipment emissions. It is unclear if this misclassification of equipment also affected the emissions of on-road motor vehicle trips, although an initial review indicates that trip rates may be reasonable, with the potential exception of worker trip estimates.
- **Biological Resources.** In general, the SWEP is likely to have significant but mitigable (Class II) impacts comparable to the LWEP, including impacts to listed and other special-status species, removal and degradation of sensitive habitats including wetlands and seeps, native tree removal, and introduction and spread of invasive species, disturbance to nesting birds. The SWEP would include impacts in the Coastal Zone for grading for access routes, which will likely introduce the need for additional analysis and perhaps additional mitigation. Additionally, the SWEP would have an increased impact on native oak trees than the LWEP. Bird and bat morality will be the most difficult biological resources issue in the analysis of the SWEP and is the impact most likely to be considered significant and unavoidable (Class I). Substantial additional information on this issue has been developed since the preparation of the LWEP EIR and Aspen will utilize its extensive experience with this issue to prepare an updated analysis of bird and bat mortality for the SWEP.
- **Cultural and Tribal Resources.** A total of 33 historic resources have been identified within the project area and the EIR Supplement will need to determine how these resources would be affected by the proposed SWEP. The applicant's Cultural Resources Technical Report is currently being updated to address County comments. This updated report together with the information in the LWEP Final EIR will provide the basis for addressing cultural resources in the EIR Supplement. Tribal cultural resources were not specifically addressed in the LWEP Final EIR and will be addressed in the EIR Supplement.
- **Energy.** As indicated in the RFP, It is not anticipated that the SWEP would create a significant impact associated with energy and the project would have certain beneficial effects associated with generating renewable energy. The full explanation for this conclusion will be presented in the EIR Supplement.
- **Fire Hazards and Emergency Services.** This section will not contain a discussion regarding population-based impacts on service ratios or performance standards for fire or emergency services. Since the publishing of the LWEP Final EIR, additional wildfires have occurred in the region, including some very large wildfires. Information related to these fires and the potential for future fires to result in the region that could be attributed to the project will be presented in this section.
- **Geology and Soils.** The geology and soils analysis will describe effects related to geology, soils, and seismic hazards that have the potential to be caused by implementation of the SWEP. Potential

hazards consist primarily of construction triggered erosion, expansive soil, slope instability and landslides, seismic shaking, and liquefaction.

- **Greenhouse Gas Emissions (GHG).** GHG emissions were not analyzed in the LWEP EIR. Aspen's specialists will peer review the applicant's technical report and verify its analysis and conclusions. Aspen will verify how this report addresses the Santa Barbara County GHG emissions significance thresholds, and whether all quantifiable project construction direct and indirect emissions sources (water use and land use changes) and indirect emissions reductions (renewable energy production) are included.
- **Hazards and Hazardous Materials.** Unique hazards associated with wind turbine generators include thrown rotor blades, tower failure, ice throw, and turbine fires. While accidents associated with these potential hazards are relatively rare, they have been documented at wind energy facilities. Exposure to electric and magnetic fields is also a potential issue, particularly along the 115-kV generation interconnection line. Because of their height, wind turbine generators can sometimes present a navigational hazard for aircraft. For this project, this hazard is primarily related to aircraft operations associated with nearby Vandenbergy Air Force Base. Potential hazardous materials issues include accidental release of hazardous substances into the environment and resultant contamination. All of these potential hazards will need to addressed in the EIR Supplement.
- **Hydrology/Water Quality.** The SWEP will have the potential to affect surface water drainage patterns, flooding, water quality, and water supplies. The LWEP Final EIR determined that, with mitigation, impacts to surface water resources would not be significant. A recent hydrologic assessment for the proposed SWEP came to the same conclusion, but did not consider the proposed modifications to San Miguelito Road and the proposed transmission line, and recommended mitigation measures mainly addressing construction and erosion protection. The EIR Supplement will need to evaluate this existing information in order to assess direct and indirect surface water and groundwater effects of the project and develop specific mitigation strategies, where needed, to avoid adverse impacts.
- **Land Use and Planning.** The analysis of land use and planning will need thresholds listed in Appendix G of the State CEQA Guidelines, as well as the County's "Quality of Life" thresholds listed in the County's Environmental Thresholds and Guidelines Manual. The SWEP site is not within a habitat conservation plan or natural community conservation plan area and, therefore, analysis of potential conflicts with such plans will not be needed.
- **Mineral Resources.** As indicated in the RFP, it is likely that the project's impacts on mineral resources will not be significant. The full explanation for this conclusion will be presented in the EIR Supplement.
- **Noise.** Wind turbine generators are a source of noise. The Final EIR for LWEP found that the project would result in significant noise impacts that could be mitigated and identified nine measures that could be implemented to avoid the noise impacts. The SWEP applicant's Environmental Noise Analysis concludes that the project would "meet the noise requirements of Santa Barbara County and CEQA" without identifying any mitigation. Whether any or all of the previous mitigation measures need to be carried forward will be a focus of our noise analysis.
- **Paleontological Resources.** Ground-disturbing activities associated with construction of the proposed project have the potential to damage or destroy paleontological resources that may exist at the project site. Impacts on paleontological resources described in the LWEP Final EIR will be re-evaluated to determine whether they accurately characterize impacts based on the revised layout and configuration of the SWEP.

- **Population and Housing.** As indicated in the RFP, it is likely that impacts related to population and housing would not be significant. The full explanation for this conclusion will be presented in the EIR Supplement.
- **Public Services.** As indicated in the RFP, it is likely that impacts related to public services would not be significant. The full explanation for this conclusion will be presented in the EIR Supplement. Potential impacts on fire and police response will be analyzed within the section on Fire Hazards and Emergency Services.
- **Recreation.** Recreational uses in within the area include Miguelito County Park, as well as cycling, birding, and running along San Miguelito and Sudden Roads. As indicated in the RFP, It is not anticipated that the SWEP would create a significant impact on recreation. The full explanation for this conclusion will be presented in the EIR Supplement.
- **Transportation/Traffic.** The proposed SWEP would result in traffic impacts during construction as a result of activities that generate traffic, such as worker vehicle trips and materials/equipment deliveries. In addition, construction of the transmission line may disrupt traffic at locations where the alignment would cross or run adjacent to a public roadway. Such issues as lane blockages, increased congestion, access to adjacent properties, safety, pedestrian routes, public transportation, and emergency vehicle access will need to be addressed. Project operations would also generate traffic due to worker commute trips and maintenance vehicles.
- **Utilities and Services Systems.** As indicated in the RFP, it is likely that the impacts to utilities and service systems would not be significant and a complete full explanation for this conclusion will be presented in the EIR Supplement. The County's Environmental Thresholds contains guidance and thresholds for analysis for impacts to surface and storm water quality, and solid waste, which will be incorporated into the analysis. It is anticipated that the project would result in the same to similar impacts to utilities and service systems described in the LWEP Final EIR.

Range of Alternatives

The EIR Supplement will need to evaluate a reasonable range of alternatives that meet most project objectives, are feasible, and have the potential avoid or reduce one or more significant impacts of the proposed project. The EIR Supplement will also need to consider a No Project alternative in which the proposed SWEP is not approved and the project site remains in its existing condition for the time being. A Reduced Project alternative should also be evaluated as such an alternative would have the potential reduce the project's significant impacts. Other possible alternatives include: an alternate site configuration with modified turbine/road locations, alternate substation location, and/or different power line routing. Some of these alternatives are conceptually similar to alternatives evaluated in the LWEP Final EIR.

All possible alternatives do not need to be carried forward for analysis in the EIR Supplement, rather CEQA requires a reasonable range of alternatives to be evaluated. Ideas for alternatives that are either infeasible, inconsistent with project objectives, or would not reduce significant project impacts should be eliminated with reasoning provided in the EIR Supplement for their elimination.

1.3 Project Team

As discussed in Section 3, Personnel, Aspen has assembled a team for the proposed SWEP EIR Supplement with significant experience conducting CEQA analysis and, importantly, experience applying their knowledge and expertise to the analysis of wind energy projects. These team members also have experience conducting CEQA analysis in Santa Barbara County. This experience will increase the efficiency of activities required for

EIR preparation. All subcontractors on the team have a long history (each over 20 years) of working with Aspen to prepare CEQA documents.

Aspen will serve as the prime contractor with responsibility for overall management of the team. The team will be managed by experienced senior project manager Jon Davidson who has over 30 years of experience managing CEQA documents, including wind energy project experience. Mr. Davidson will be assisted by Stanley Yeh who is an experienced CEQA professional who has worked on numerous wind energy EIRs, including a management role in seven EIRs for wind energy projects.

The management team will be supported by technical experts in issue areas such as visual resources, air quality/greenhouse gases, GHG emissions, biological resources, cultural resources, hazardous materials, water resources, noise, and traffic, among others. The Aspen staff members selected for this project have extensive CEQA experience and have worked on multiple wind energy projects.

Aspen will be supported by three highly experienced subconsultant firms. Michael Clayton & Associates will evaluate effects on aesthetics and visual resources, Geotechnical Consultants, Inc., will address effects related to geology and soils, and Garland Associates will analysis impacts on traffic and transportation.

Aspen Environmental Group

Aspen Environmental Group is an expert interdisciplinary environmental services firm that is headquartered in Agoura Hills and has additional offices in Sacramento, San Francisco, Inland Empire, Palm Springs, and Phoenix. Aspen was founded in 1990 and incorporated in 1991, and continues to grow, specializing in the management of environmental assessment efforts under CEQA and National Environmental Policy Act (NEPA). This work typically is in support of agency permitting for infrastructure and public works projects, especially energy projects. Aspen also provides a variety of technical services related to environmental assessment, planning, and regulatory compliance. Aspen's staff is comprised of professionals in engineering and the physical, earth, life, and social sciences. In addition to our project management role, Aspen provides a team of experienced resource specialists and engineers in the fields of air quality and greenhouse gas emissions, biological and cultural resources, traffic, water resources, and land use/policy consistency, among others. The experience and qualifications of these individual specialists are described in Section 3 of this proposal, with resumes provided in Appendix A, Resumes of Key Team Members.

Michael Clayton & Associates

Michael Clayton & Associates (MCA) has 30 years of experience in visual impact assessment and environmental impact analysis and has successfully collaborated with Aspen Environmental Group for over 20 years. Mr. Clayton has conducted more than 300 visual impact assessments using a variety of visual assessment methodologies for application to infrastructure and energy and resource development projects on both public lands and private lands. He also provides expert witness testimony with regards to visual resources analysis on behalf of the State of California. MCA has conducted visual resource impact assessments in varied landscapes throughout California for a variety of project types such as wind power projects, electric transmission lines, substations, solar energy projects, combined cycle power plants, water conveyance and storage facilities, hydroelectric projects, pipelines, roads, telecommunications projects, and wastewater treatment plants. Mr. Clayton has also conducted numerous third-party reviews of visual impact assessments on behalf of public agencies and has been recognized numerous times for the quality of his work and contributions to overall team performance, as follows. MCA has received multiple awards for their visual impact assessment work, including the Outstanding Environmental Analysis Award from the AEP for the Visual Resources analysis he prepared for the Ocotillo Wind Energy Facility EIR/EIS.

Geotechnical Consultants, Inc.

Geotechnical Consultants, Inc. (GTC) has provided consulting services in geotechnical engineering and engineering geology for over 40 years and has a 25-year working relationship with Aspen Environmental Group. The firm has capably supported Aspen for many years, including work on the ERG West Cat Canyon and Aera East Cat Canyon oil field development EIRs, and PXP Tranquillon Ridge EIR. GTC staff has applied their geotechnical expertise to a wide range of infrastructure projects including oil and gas facilities, pipelines, and pump stations. Their geotechnical work includes research; geologic field mapping; aerial photo interpretation; subsurface exploration using drilling and trenching methods and cone penetration testing; land and marine geophysical surveys; in-situ and laboratory testing; geologic, engineering, and seismic risk analyses; and construction observation and testing. GTC conducted the geotechnical investigations for the Celeron–All American Pipeline, Pt. Arguello Pipeline alignment, and the Exxon Corral–Los Flores Onshore Facility. In addition, GTC has conducted environmental assessments and prepared documentation for Geology, Geologic Hazards, Groundwater, Soils, and Hazardous Materials sections for numerous EIRs/EISs, including the Pacific Pipeline Project, Gaviota to Long Beach alignment.

Garland Associates

Garland Associates (GA) has over 35 years of experience in traffic engineering and transportation planning and has worked has a subcontractor to Aspen Environmental Group for over 20 years. GA conducts traffic impact, transit, parking, circulation, safety, and traffic control studies for a variety of locations and situations, ranging from individual development projects to regional planning efforts. GA's experience includes the planning, design, and analysis of transportation facilities for airports, central business districts, redevelopment areas, ports, neighborhoods, and institutions. GA has conducted transportation studies for numerous development projects, including the construction or expansion of infrastructure projects, office buildings, hospitals, shopping centers, residential developments, industrial sites, schools, hotels, and recreational facilities.

2. Qualifications

Since the company's founding over 27 years ago, Aspen Environmental Group has specialized in providing professional environmental services for energy projects. No other environmental consulting firm maintains such a strong focus on the energy sector. As a result, Aspen has a broad portfolio of energy experience, including all forms of energy generation and transmission, including renewable energy projects (such as wind and solar), gas-fired and nuclear power plants, high-voltage transmission lines, electrical substations, petroleum pipelines, and oil/gas extraction and refining.

One of Aspen's primary services is environmental impact analysis in accordance with the requirements of the California Environmental Quality Act (CEQA) and National Environmental Policy Act (NEPA). Aspen has analyzed projects of all types, sizes, and complexities, including many large and controversial projects. Aspen has expertise in all areas of CEQA and NEPA compliance and has provided these services to public agencies since the company's inception. Aspen's focus on energy combined with its expertise in CEQA and NEPA compliance have resulted in an impressive record of accomplishment in analyzing energy projects that is unmatched in California. These factors make Aspen the ideal choice to prepare an EIR Supplement for the Strauss Wind Energy Project.

Experience Highlights

- *Completed over **1,400** assignments for energy projects.*
- *California's most experienced firm in the analysis of power generation projects.*
- *Analyzed over **8,000** megawatts of wind energy projects.*
- *Experience with all types of renewable energy projects.*

Some of the first EIRs prepared by Aspen were for energy projects in Santa Barbara County, including the Gaviota Marine Terminal EIR/EIS and Pacific Pipeline EIR/EIS. Since that time, Aspen's experience has expanded to encompass a wide variety of energy projects. Aspen is now the most experienced firm in California in conducting environmental analysis for power generation projects, including renewable energy projects. That experience includes the preparation of the Final EIR for the Lompoc Wind Energy Project, which was the original wind energy project proposed for the Strauss Wind Energy Project site.

2.1 The Aspen Team

Table 2 below list the firms that comprise the Aspen Team and identifies their respective project roles.

Table 2. The Aspen Team

Firm Name	Project Role	Company Type	Percent Contribution
Aspen Environmental Group	Prime Contractor, Agriculture and Forestry Resources, Air Quality, Biological Resources, Cultural Resources, Energy, Fire Hazards and Emergency Services, Greenhouse Gas Emissions, Hazards and Hazardous Materials, Hydrology and Water Quality, Land Use and Planning, Mineral Resources, Noise, Paleontological Resources, Public Services, Recreation, Utilities and Service Systems	Corporation Tax ID No. 95-4337914	71.6%
Michael Clayton & Associates	Subcontractor: Aesthetic/Visual Resources	Sole Proprietorship	17.9%
Geotechnical Consultants, Inc.	Subcontractor: Geology and Soils	Corporation	5.3%
Garland Associates	Subcontractor: Transportation and Traffic	Sole Proprietorship	5.2%

Aspen Environmental Group

Aspen is a full-service environmental consulting firm with particular strength and experience in conducting environmental analysis and preparing documentation to satisfy the requirements of CEQA. We also have the expertise to ensure compliance with other important environmental regulations, such as the California Fish and Game Code, Clean Water Act, Endangered Species Act, Clean Air Act, and National Historic Preservation Act, among others. Our team is comprised of experienced project managers, engineers, scientists, and planners, including specialists in biological resources, cultural resources, regulatory permitting, and mitigation monitoring. We have the ability to help our clients across the entire project life cycle from initial project planning through construction and into operation and maintenance.

Aspen Environmental Group

- *Founded in 1990 and incorporated in 1991.*
- *Headquartered in Agoura Hills with regional offices in Sacramento, San Francisco, and the Inland Empire.*

Aspen specializes in the preparation of CEQA documents, including Initial Studies, Mitigated Negative Declarations, and EIRs, including EIR Supplements, Subsequent EIRs, Program EIRs, EIR Addendums, and joint EIR/EIS documents. In addition, Aspen has extensive experience preparing various types of documents in support of the EIR process, such as scoping reports, alternatives screening reports, biological assessments, coastal consistency determinations, air quality general conformity analyses, and public involvement plans.

To prepare CEQA documents, Aspen utilizes the capabilities of seasoned in-house project managers and technical specialists. When needed, Aspen augments its team with specialty subcontractors. Aspen project managers each have ten years or more of CEQA experience and a record of accomplishment in successfully completing CEQA documents for a wide range of projects. Aspen also employs a team of experienced senior technical specialists across a variety of science, engineering, and planning disciplines who guide and supervise data collection and analysis. Aspen has established working relationships with a variety of subcontractors who are experts in their respective fields, understand CEQA analysis, and have demonstrated the ability to perform in accordance with Aspen's standards and expectations.

Aspen currently is preparing the ERG West Cat Canyon Revitalization Plan Project EIR and Aera East Cat Canyon Oil Field Redevelopment Plan Project EIR for Santa Barbara County. Previous work for the County includes the Lompoc Wind Energy Project EIR, Tranquillon Ridge Oil and Gas Development Project EIR, expert review for the County GHG threshold-setting process, Gaviota Marine Terminal EIR/EIS and Supplemental EIR/EIS, and Air Quality Technical Report for the Molino Gas Project.

Aspen CEQA Experience

Aspen's CEQA expertise and experience have been gained over many years and includes the full range of CEQA-compliance functions. Aspen has successfully completed EIRs for some of the most challenging and controversial projects in the state since the company's founding more than 27 years ago. As a result, Aspen has earned a reputation for thorough and objective analysis, quality work products, and client service, making Aspen one of California's most accomplished and trusted environmental consulting firms.

Aspen has conducted CEQA review for many types of infrastructure, public works, and industrial projects, including the following types of CEQA-related activities:

- Preparation of Initial Studies (IS), Negative Declarations, Mitigated Negative Declarations (MND), and Draft and Final EIRs;
- Preparation and distribution of required notices, including Notices of Preparation, Notices of Completion, Notices of Availability, Notices of Determination, and Notices of Exemption;

- Preparation of project descriptions and formulation of feasible alternatives;
- Field studies and research;
- Engineering evaluation of projects to determine specific impact parameters;
- Feasibility studies of alternatives and mitigation measures;
- Mitigation measure development, evaluation, implementation, and monitoring; and
- Public participation, including project websites, notices for mail and media, public workshops and hearings, fact sheets and brochures, graphic displays, and non-English language materials.

Aspen Wind Energy Experience

Aspen has significant experience conducting impact analysis of wind energy projects, including multiple projects in the Tehachapi Wind Resource Area, the state's largest wind resource area. Aspen is one of the most experienced firms in California and has analyzed some of the state's largest wind energy facilities. Presented below are brief descriptions of this experience.

Lompoc Wind Energy Project

97.5 MW	65 WTGs	2,950 acres

Under contract to Santa Barbara County, Energy Division Planning and Development, Aspen managed the preparation of the Final EIR for the proposed Lompoc Wind Energy Project. This project involved the installation of 65 wind turbines and associated facilities including an approximately 9-mile 115-kV power line, electrical collection and distribution lines, substation, meteorological towers, onsite access roads and road improvements, communication system, and operation and maintenance facility. The EIR focused on the potential impacts associated with project construction and operation. Operational issues of concern include avian mortality and long-term visual impacts associated with project facilities within a rural environment.

Alta East Wind Energy Project

318 MW	120 WTGs	2,592 acres

Aspen prepared an EIS/EIR for the Alta East Wind Project on behalf of Kern County and the U.S. Bureau of Land Management (BLM). The Alta East Wind Project will generate up to 318 megawatts (MW) of electricity through wind power and includes 120 wind turbine generators, a substation, transmission interconnection to Southern California Edison's Windhub Substation, access roads, and ancillary facilities. The project site encompasses 2,592 acres located approximately three miles northwest of the unincorporated town of Mojave in southeastern Kern County. A portion of the site is located on private land under the jurisdiction of Kern County, but the majority of the site is located on BLM-administered land. The project included an Application for a Right-of-Way (ROW) Type 3 Grant with the BLM and a resource management land use Plan Amendment (PA) to the California Desert Conservation Area Plan. Approval of the POW grant and PA by the BLM authorized the construction, operation, maintenance, and decommissioning of the portion of the project located on BLM administered lands. The EIS/EIR evaluates six alternatives to the proposed project, including one revised site layout alternative, two reduced project alternatives, and three ROW Grant

and County approval alternatives. Information contained in the EIS/EIR was considered by the BLM in its deliberations regarding approval of the ROW grant, as well as a Land Use Plan Amendment and a Specific Plan Amendment, and by the County in its authorization of a change in zone classification to include the Wind Energy Combing District for private lands and a conditional use permit for the use of a temporary concrete batch plant during construction. Aspen also reviewed applicant technical studies, conducted field work for biological and cultural resources, and coordinated activities with BLM and Kern County.

Ocotillo Wind Energy Facility

465 MW	155 WTGs	12,400 acres

Aspen, under contract with Imperial County, prepared the EIR/EIS for the Ocotillo Wind Energy Facility. Pattern Energy, through Ocotillo Express LLC (OE LLC), proposed to construct and operate a 465-MW wind generation facility on approximately 12,400 acres in Imperial County, California, west of the unincorporated community of Ocotillo. OE LLC acquired from Green-hunter, another developer, its rights to approximately 5,915 acres of U.S. Department of the Interior, BLM-administered lands, and from its affiliate Wind Development Contract Company, its application for an additional 8,878 acres of adjacent BLM-administered lands. Additionally, OE LLC has entered into an agreement with the owner of approximately 26 acres of private land near the center of the project site for wind monitoring. Major facilities include 155 wind turbine generators, access roads, and electrical collection and connection. Ancillary facilities include an operation and maintenance facility, project substation and switchyard, temporary parking and storage laydown, temporary batch plant, sand and gravel source, and permanent meteorological towers. A 500-kV above-ground stub line would connect the project substation to the new San Diego Gas & Electric Sunrise Powerlink 500-kV line. This controversial project was the subject of heavy opposition by Native American tribes, local residents, and desert resource advocates. Although the approved project was pared down in size, opponents were still dissatisfied with the project. Multiple federal lawsuits were filed against the project, but all were dismissed by the courts.

The Ocotillo Wind Energy Facility EIR/EIS was awarded in Outstanding Environmental Analysis Document Award from the Association of Environmental Professionals in 2013.

Alta Infill II Wind Energy Project

530 MW	150 WTGs	5,185 acres

Aspen prepared a Supplemental EIR for the Alta Infill II Wind Energy Project on behalf of the Kern County Planning and Community Development Department. The project is an expansion of a wind energy generation facility to generate up to 530 MW of additional electricity from wind turbine generators on an approximately 5,185-acre site. The project required multiple zone changes and Conditional Use Permits. The EIR evaluated potential impacts of implementing a change in zone classification to incorporate the Wind Energy Combining District to the base district for approximately 2,909 acres of the project site. Aspen also assisted in the review of environmental technical reports prepared by the applicant, prepa-ration of the Findings of Fact and Statement of Overriding Considerations, and preparation of the mitigation monitoring and reporting program. Notably, Aspen completed the Final Supplemental EIR in September 2011, four months after project kickoff in May 2011.

Morgan Hills Wind Energy Project

230 MW	76 WTGs	3,808 acres

The Kern County Planning and Community Development Department, as lead agency, determined that an Environmental Impact Report must be prepared for the proposed Morgan Hills Wind Energy Project. The Project site consists of 3,808 acres of privately owned parcels, located in the southeastern portion of the unincorporated area of Kern County, California. Development of the Project requires a change in zone classification on 2,191 acres to include the Wind Energy Combining District for the commercial production of up to 230 MW of electricity from up to 76 WTGs. Power generated at the Project would be transferred to Southern California Edison's 230-kilovolt transmission system at the Windhub Substation. The Project also required approval of a Conditional Use Permit to allow the use of a temporary, mobile concrete batch plant to provide concrete and materials for WTG, substation, and operation and maintenance building foundations. Notably, Aspen completed the Final EIR in October 2011, 6 months after project kickoff in April 2011.

North Sky River & Jawbone Wind Energy Project

339 MW	116 WTGs	13,535 acres

Aspen prepared EIR for the North Sky River Wind Energy Project and Jawbone Wind Energy Project. The project, as proposed is a wind energy generation facility that would generate up to 339 MW of electricity from WTGs on an approximately 13,535-acre site in unincorporated Kern County, California. The EIR evaluated potential impacts of implementing a change in zone classification to incorporate the Wind Energy (WE) Combining District to the base district for approximately 1,292 acres of the approximately 13,535-acre project site. Rezoning would allow for construction of the WTGs, ancillary facilities, and supporting infrastructure, including up to two substations, on-site overhead transmission line, underground distribution cables, and internal access roads. Aspen prepared a full issue area EIR that identified significant unavoidable impacts with respect to the following resources: aesthetics (operational impacts), air quality (construction impacts), biological resources (construction and operational impacts), cultural resources (construction impacts), and recreation (construction and operational impacts).

Pacific Wind Energy Project

250 MW	250 WTGs	8,300 acres

Aspen prepared an EIR for the Pacific Wind Energy Project. The project, as proposed by enXco Development Corporation is a wind energy generation facility that would generate up to 250 MW of electricity from WTGs on an approximately 8,300-acre site in unincorporated Kern County, California. The EIR evaluated potential impacts of implementing a change in zone classification to incorporate the Wind Energy (WE) Combining District to the base district for approximately 4,584 acres of the approximately 8,300-acre project site. Rezoning would allow for construction of the WTGs, ancillary facilities, and supporting infrastructure, including

up to two substations, on-site overhead transmission line, underground distribution cables, and internal access roads. Aspen prepared a full issue area EIR that identified significant unavoidable impacts with respect to the following resources: aesthetics (operational impacts), air quality (construction impacts), biological resources (construction and operational impacts), cultural resources (construction impacts), and Recreation (construction and operational impacts).

Alta-Oak Creek Mojave Project	800 MW	350 WTGs	9,300 acres

Aspen prepared an EIR for the Alta-Oak Creek Mojave Project (proposed project or project). The project, as proposed by Alta Windpower Development, LLC (project proponent) is a wind energy generation facility that would generate up to 800 MW of electricity from WTGs on an approximately 9,300-acre site in unincorporated Kern County, California. The EIR evaluated potential impacts of implementing a change in zone classification to incorporate the Wind Energy (WE) Combining District to the base district for approximately 2,772 acres of the approximately 9,300-acre project site. Rezoning would allow for construction of the WTGs, ancillary facilities, and supporting infrastructure, including up to two substations, on-site overhead transmission line, underground distribution cables, and internal access roads. Aspen prepared a full issue area EIR that identified significant unavoidable impacts with respect to the following resources: aesthetics (operational impacts), air quality (construction impacts), biological resources (construction and operational impacts), cultural resources (construction impacts), and recreation (construction and operational impacts).

Tehachapi Wind Resource Area	4,500 MW	--	~205,000 acres

Aspen prepared a programmatic analysis for development of up to 4,500 MW of wind energy generation in the Tehachapi Wind Resource Area (TWRA) as part of the Tehachapi Renewable Transmission Project (TRTP) EIR/EIS on behalf of the California Public Utilities Commission and USDA Forest Service. The TWRA is located in the Antelope Valley within Kern County. The TWRA study area was established using the Kern County Zoning Ordinance, the locations of existing transmission systems and wind farms, the CEC annual wind power density map, land uses and flight restriction zones in the area, and input from Kern County planning staff. A programmatic analysis was then conducted for wind energy development within the TWRA boundary using the Kern County Significance Criteria, the Kern County General Plan, and information from existing and proposed wind farms in the area. This analysis was prepared for the TRTP EIR/EIS because the new transmission lines, substations, and transmission upgrades proposed as part of TRTP were intended to serve new renewable energy development in the Tehachapi and Mojave areas, specifically new wind energy development in the TWRA. The programmatic analysis of the TWRA made sure that the TRTP EIR/EIS analyzed the “whole of the action”, including possible connected actions and reasonably foreseeable cumulative projects.

Manzana Wind Project

300 MW	300 WTGs	5,820 acres

Aspen conducted an environmental evaluation of the Manzana Wind project to assist the CPUC in its decision on whether to approve the Certificate of Public Convenience and Necessity filed by the Pacific Gas and Electric Company (PG&E) for its proposed purchase of the Manzana Wind Project (formerly known as the PdV Wind Energy Project) located in Kern County. The Manzana Wind Project is situated on 5,820 acres of land and entailed the installation of up to 300 WTGs to produce up to 300 MW of wind energy. The environmental review analysis document prepared by Aspen included a review of PG&E's Proponent's Environmental Assessment, the PdV Wind Energy Project EIR and addendums, as well as any activity or issues that arose between Kern County's approval of the EIR and the proposed purchase of the wind project by PG&E. Aspen also assisted the CPUC in exploring and developing additional mitigation measures to address impacts to the endangered California condor.

Pine Tree Wind Project

120 MW	80 WTGs	8,000 acres

After certification of the Final EIR for the Pine Tree Wind Project, the Los Angeles Department of Water and Power (LADWP) needed to evaluate certain project changes prior to construction. Aspen first prepared a detailed comparison matrix of the revised project and the project described in the Final EIR. Aspen also prepared a matrix that compared the environmental impacts identified in the EIR for the originally proposed project and the revised project. Aspen then prepared detailed air pollutant emission calculations for the LADWP to quantify impacts associated with changes in earth movement quantities. These changes resulted from the development of more detailed engineering plans for the wind energy project, primarily associated with road construction. Upon completion of the revised project's emission estimates, the results of the analysis were incorporated into an Air Quality Technical Report that was used by the LADWP to determine whether any supplemental environmental review was triggered by the project changes.

Bogle Wind Turbine Project

2.3 MW	1 WTG	60 acres

In August 2011, Bogle opened a new wine production facility at 49762 Hamilton Road, west of Jefferson Boulevard (State Route 84), approximately 4.5 miles southwest of Clarksburg, California. Bogle proposed to construct and operate a single large wind turbine that would generate 1.8 MW of electricity to provide electrical power for the Bogle wine production facility. Bogle proposed to construct the wind turbine at the southwest corner of a 60-acre parcel adjacent to the wine production facility. The County-prepared MND for this controversial project was successfully challenged and the court ordered preparation of an EIR. Aspen prepared an EIR to evaluate the impacts of the proposed wind turbine, including collision impacts to state-threatened Swainson's hawk.

Tule Wind Energy Project

200 MW	134 WTGs	15,492 acres

Pacific Wind Development submitted an application to construct, operate, and maintain an energy generation facility that would generate 200 MW of renewable power. The project, known as the Tule Wind Project, would include the construction of new roads, turbines, a transmission line, and other facilities. The proposed project would be constructed on approximately 15,492 acres comprised of lands administered by the BLM and the CSLC, on lands of the Ewiiaapaayp Indian Reservation, and on privately-owned property under the jurisdiction of San Diego County. Aspen was tasked with reviewing the Draft and Final EIS/EIR for the proposed Tule Wind Project to ensure that it met BLM and NEPA requirements.

Mesa Wind Power Project

8 MW	144 WTGs	450 acres

The existing Mesa Wind Project is located entirely on approximately 450 acres of lands administered by the BLM in Riverside County. The project is located about 11 miles northwest of the City of Palm Springs, north of Interstate 10 and just west of the Whitewater River. The existing project was built in 1983-1984 and consists of 460 65-kW Vestas V15 turbines with a mix of 85- and 140-foot towers, for a total of 30 MW of output. As of 2015, there are 129 operating turbines for a total of about 8 MW. The project developer is requesting a renewal of the BLM right-of-way grants that would include continued operations of the existing turbines and an eventual repower (replacement of most existing turbines with 10 to 15 much larger turbines). Aspen is providing the developer with project development assistance and agency coordination, including coordination with the BLM including research into the existing land use designations for the area, completing biological resources surveys and jurisdictional delineations, drafting portions of potential NEPA documents, preparation of a Fire Management Plan and biological assessment of recent fires; review of Fire Management Plan for existing operations, and drafting a revised Plan of Development.

Montezuma II Wind Energy Project

78.2 MW	34 WTGs	2,539 acres

The Montezuma II Wind Energy Project, proposed by NextEra Energy, consisted of the construction of 34 wind turbines in Solano County. Aspen managed the pre-construction compliance review and mitigation monitoring for Solano County, including reporting. Aspen resource specialists also participated in the Avian and Bat Protection Plan Technical Advisory Committee for the Montezuma Wind Energy Resource Area.

Some of Aspen's additional relevant project experience is presented in Table 3 below, including significant experience with other renewable energy projects, transmission lines, and substations.

Table 3. Additional Relevant Energy Experience	
Project Name *Lead Agency*	**Key Project Features**
SCE Tehachapi Renewable Transmission Project *California Public Utilities Commission*	▪ Prepared an EIR/EIS for a series of high-voltage transmission upgrades in Kern, Los Angeles, and San Bernardino Cos. to deliver 4,500 MW of new wind energy. ▪ Largest transmission project constructed to date to access renewable energy. ▪ Over 200 miles of transmission line, one new substation, six substations expanded.
Desert Renewable Energy Conservation Plan (DRECP) *California Energy Commission, BLM Desert District*	▪ Prime contractor for this federal, state, and local planning effort to conserve sensitive desert resources, while enabling renewable energy development. ▪ One of the largest habitat conservation plans in the nation. ▪ Aspen took the lead in preparing the EIR/EIS for the DRECP.
PG&E Seventh Standard Substation Project *California Public Utilities Commission*	▪ On behalf of the CPUC, prepared a IS/MND for a proposed 4.9-acre Seventh Standard Substation in Kern County, including extension of a 115-kV power line. ▪ Provided on-site environmental monitoring during construction to ensure compliance with mitigation measures and permit conditions.
SCE Downs Substation Expansion Project *California Public Utilities Commission*	▪ Prepared a IS/MND for the CPUC for a 2.5-acre expansion of the Downs Substation in Kern County, including 115-kV pole replacement and installation of 58 miles of fiber-optic telecommunications cable. ▪ Provided on-site mitigation monitoring during project construction.
Barren Ridge Renewable Transmission Project *Los Angeles Department of Water and Power*	▪ Provided construction support for this major high-voltage transmission line to serve the Pine Tree Wind Project and other High Desert renewable energy projects. ▪ Work included pre-construction biological resource surveys, biological and paleontological monitoring, permit compliance, and compliance reporting.
California Valley Solar Ranch *County of San Luis Obispo*	▪ Prepared an EIR for a 250-MW solar photovoltaic facility on 2,000 acres on the Carrizo Plain in eastern San Luis Obispo County. The project also included a new substation, collector lines, 2.8-mile transmission line, and aggregate mine. ▪ Provided on-site mitigation monitoring during construction for the county.
Topaz Solar Farm *County of San Luis Obispo*	▪ Prepared an EIR for a 550-MW solar photovoltaic facility on 7,800 acres on the Carrizo Plain in eastern San Luis Obispo County. The project also included a new substation, collector lines, maintenance facility, and solar learning center. ▪ Provided on-site environmental monitoring during construction.
Panoche Valley Solar Farm *County of San Benito*	▪ Prepared an EIR for a controversial 420-MW solar photovoltaic facility on 5,000 acres in an agricultural area in San Benito County. Located within a USFWS Recovery Plan area for Upland Species of the San Joaquin Valley. ▪ Provided on-site mitigation monitoring during construction for the county.
EDF Renewables Desert Harvest Solar Project *BLM Desert District*	▪ Prepared an EIS for the BLM Desert District for a 150-MW solar photovoltaic facility on 1,200 acres near Desert Center in Riverside County. ▪ Project includes a 220-kV gen-tie transmission line to connect to SCE's Red Bluff Substation where power would be fed into the Devers-Palo Verde No. 1 line.
Carrizo Energy Solar Farm *California Energy Commission*	▪ Prepared technical sections for an Energy Commission Staff Assessment (CEQA equivalent) for a 177-MW solar thermal energy project using Fresnel reflector solar concentrating lines and associated steam generators in San Luis Obispo County. ▪ Analyzed waste management, land use, traffic, socioeconomics, and alternatives.
SCE El Casco System Project *California Public Utilities Commission*	▪ Prepared an EIR for a new 220/115/12-kV substation, upgrades to two existing substations, a 15.4-mile 115kV subtransmission line, and fiber-optic cable in Riverside and San Bernardino Counties. ▪ EIR Supplement prepared to address changes in power pole type and number.

Table 3. Additional Relevant Energy Experience	
Project Name *Lead Agency*	**Key Project Features**
SCE Valley South Subtransmission Project *California Public Utilities Commission*	▪ Prepared an EIR for new 12-mile, 115-kV subtransmission line in the City of Menifee in southwestern Riverside County. ▪ The project also includes replacement of 3.4 miles of 115-kV conductor from a tubular steel pole (TSP) to a terminal TSP located outside the Triton Substation.
SDG&E Vine Substation *California Public Utilities Commission*	▪ Prepared an IS/MND for a new unstaffed, automated 69/12-kV substation in San Diego near the San Diego International Airport. ▪ Nine existing 12-kV distribution circuits were relocated within existing/new underground conduit and an existing 69-kV line was be looped into the substation.
SCE Antelope-Pardee 500-kV Transmission Project *California Public Utilities Commission*	▪ Prepared an EIR/EIS for a new 25.6-mile high-voltage transmission line through the Angeles National Forest to provide capacity to serve Antelope Valley wind projects. ▪ Eventually became Segment 1 of the Tehachapi Renewable Transmission Project, which is the state's largest transmission project serving renewable energy projects.
SLO County Renewable Energy Streamlining Program *County of San Luis Obispo*	▪ This program was developed to allow streamlined permitting for renewable energy projects in the county based on environmental factors and project scale. ▪ Prepared an Opportunities and Constraints Technical Study and assisted in developing a Renewable Energy Combining Designation for the zoning code.
SPARC: San Bernardino County Partnership for Renewable Energy & Conservation *County of San Bernardino*	▪ In Phase 1, assisted in the preparation of a Renewable Energy and Conservation Element by preparing case studies of renewable energy projects, mapping areas of renewable energy potential, and helping organize public workshops. ▪ In Phase 2, conducted cost-benefit analysis, prepared technical reports on renewable energy trends, growth scenarios, and best practices, and conducted stakeholder outreach.
Inventory Report for the Geothermal/Alternative Energy & Transmission Element *County of Imperial*	▪ Prepared a Baseline Environmental Inventory Report for an update to the county's Geothermal/Alternative Energy & Transmission Element of the General Plan. ▪ Identified renewable energy resource opportunities, reviewed state and federal legislation and other General Plan elements for consistency, developed an outreach program, and prepared a revised renewable energy ordinance.
Renewable Energy General Plan Amendment *County of Inyo*	▪ As part of the development of a Renewable Energy General Plan Amendment, Aspen prepared an Opportunities and Constraints Technical Study. ▪ Assisted in identifying suitable areas for renewable energy development, developing renewable energy policy updates, and analyzing the program in an EIR.
PXP Tranquillon Ridge Ridge Development Project *County of Santa Barbara*	▪ Prepared an EIR for a proposed project for extended reach drilling from Platform Irene in federal waters into the Tranquillon Ridge Field located in State waters. ▪ Focused on impacts associated with extended reach drilling activities and Platform Irene life extension, existing pipelines, and Lompoc Oil and Gas Plant.
Aera East Cat Canyon Oil Field Redevelopment Plan *County of Santa Barbara*	▪ Preparing an EIR for the proposed development of 72 well pads and 296 wells, and associated construction of 9 miles of field access roads, new processing facilities, field gathering systems, 14-mile 8-inch natural gas pipeline, and 1,200-foot, 115-kV power line and substation.
ERG West Cat Canyon Revitalization Plan Project *County of Santa Barbara*	▪ Preparing an EIR for the proposed development of 233 new thermally enhanced production wells and supporting infrastructure, including development of 11 new well pads, installation of 4 vested steam generators, expansion of 9 existing equipment areas and production facilities, and various inner-field piping.
San Luis Transmission Project *Western Area Power Administration*	▪ Prepared an EIR/EIS for 95 miles of new high-voltage transmission line along the foothills of the Diablo Range in the western San Joaquin Valley. ▪ Prepared under the direction of the U.S. Department of Energy, Western Area Power Administration, and San Luis & Delta-Mendota Water Authority.

In addition to Aspen's extensive relevant experience, Aspen's subcontractors also bring significant experience and capability to the team. **Michael Clayton & Associates** has over 30 years of experience conducting visual impact analysis for CEQA and NEPA documents and worked with Aspen on many projects for more than 20 years, including analysis of the Ocotillo Wind Energy Facility EIR/EIS and multiple transmission line and substation projects. **Geotechnical Consultants, Inc.**, has also worked with Aspen for many years on CEQA and NEPA documents, including multiple renewable energy, transmission line, and substation projects, and several energy projects in Santa Barbara County. **Garland Associates** has worked with Aspen for nearly 25 years, including significant experience conducting CEQA traffic and transportation analysis for energy projects. The resumes of the individuals on the Aspen team from these firms in Appendix A provide more detail on the relevant experience of these subcontractors.

3. Personnel

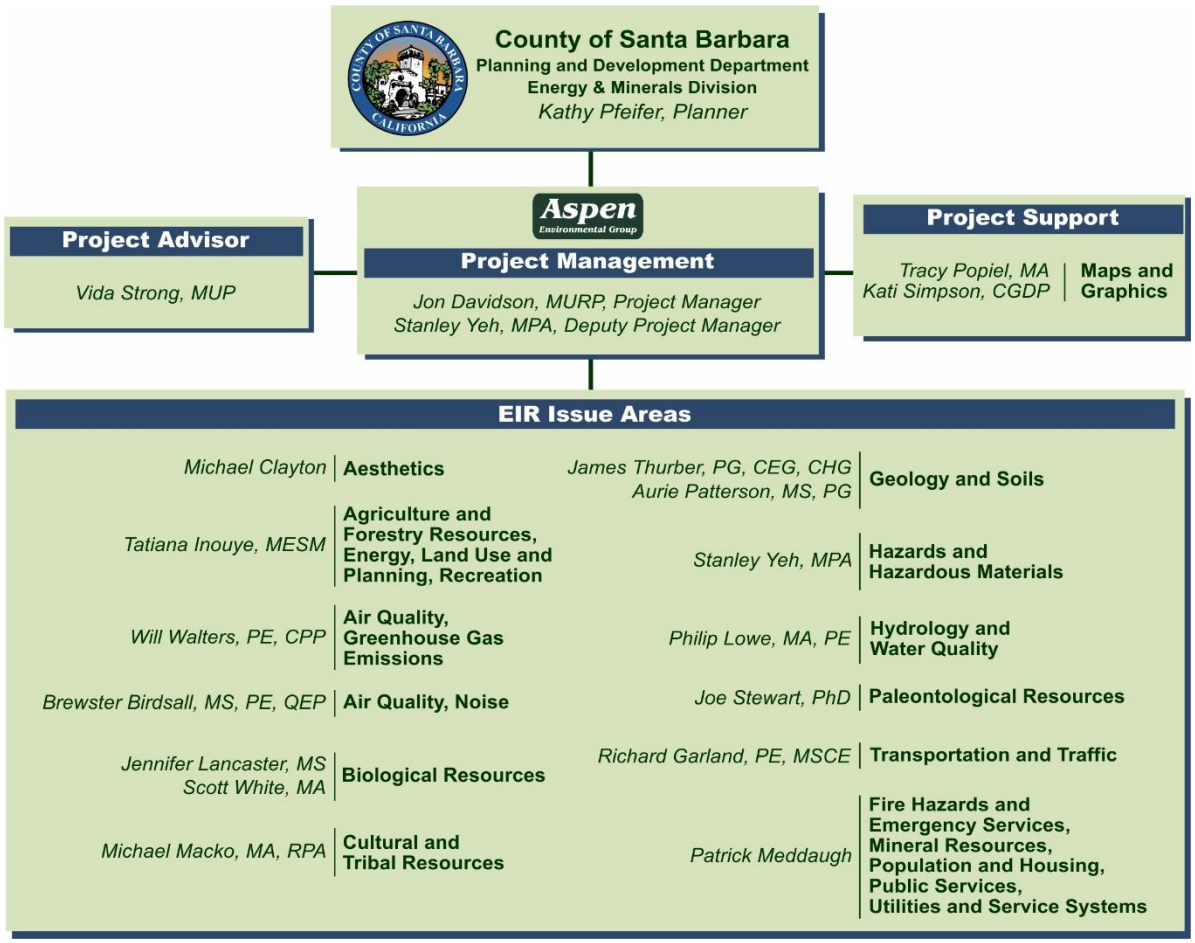
3.1 Project Management and Team Organization

Aspen has assembled a highly qualified team to prepare the EIR Supplement for the Strauss Wind Energy Project. This team is (1) experienced conducting CEQA analysis for wind energy projects, transmission lines, and substations; (2) has worked together preparing multiple EIRs; and (3) includes many of the same individuals who prepared the Lompoc Wind Energy Project Final EIR.

The Aspen Team is comprised of experts in all relevant issue areas and includes staff with relevant experience analyzing wind energy projects. The team's depth of experience in CEQA analysis, particularly with wind energy projects, will enable the efficient preparation of a thorough and objective EIR Supplement for the proposed Strauss Wind Energy Project (SWEP). Our team will work closely with the County to ensure the EIR Supplement fully complies with CEQA and fulfills the County's needs in the evaluation of this project.

The Aspen Team (see Figure 1, Organization Chart) will be managed by Jon Davidson, who brings extensive experience in EIR project management, including wind energy, transmission, and substation projects. He is one of Aspen's senior project managers and will be the County's primary point of contact during the contract performance period. Stanley Yeh, who has significant experience preparing EIRs for wind energy projects, will support in managing the team and preparing the EIR Supplement.

Figure 1. Organization Chart



Project Management

Jon Davidson is an experienced CEQA professional who has been managing EIRs for 30 years. For more than a decade, his CEQA work has been focused primarily on energy projects, including power plants, renewable energy projects, transmission lines, and substations. He managed preparation of the Ocotillo Wind Energy Facility EIR/EIS, which was named the Outstanding Environmental Analysis Document in 2013 by the Association of Environmental Professionals. He also managed the EIR/EIS for the Tehachapi Renewable Transmission Project, which was built to deliver 4,500 MW of new wind energy in Kern County to the load centers in metropolitan Los Angeles and is the largest transmission project constructed to date to access renewable energy resources. Mr. Davidson's most recent project is the management of the EIR for the decommissioning of the San Onofre Nuclear Generating Station in north San Diego County.

Stanley Yeh is a seasoned project manager with renewable energy experience. He brings over 19 years of CEQA/NEPA project management experience and has served in a management role (Project Manager or Deputy Project Manager) on seven wind energy projects (EIRs and EIR/EISs) in the counties of Kern and Imperial. He managed preparation of the programmatic wind analysis for the Tehachapi Wind Resource Area as part of the CEQA documentation for the Tehachapi Renewable Transmission Project. Additionally, he managed the environmental review of the Manzana Wind Project to assist the California Public Utilities Commission in its decision on whether to approve the Certificate of Public Convenience and Necessity filed by the Pacific Gas and Electric Company for its proposed purchase of the project.

Vida Strong is one of Aspen's senior project managers and has a strong background in CEQA and NEPA project management and the management of mitigation monitoring programs for construction of infrastructure and public works projects. She is currently serving as project manager for two EIRs in Santa Barbara County: ERG Operating Company West Cat Canyon Revitalization Plan and AERA East Cat Canyon Oil Field Redevelopment Plan. She served as Aspen's project manager for the preparation of the Final EIR for the Lompoc Wind Energy Project and will serve as an internal adviser to the Aspen team for preparation of the SWEP EIR Supplement.

3.2 Key Personnel

As requested in the RFP, this section provides a summary of the qualifications of key members of the Aspen Team. Appendix A includes resumes where more detail is provided on personnel qualifications. Table 4 presents the percentage of time each key staff member has been budgeted for preparation of the EIR Supplement. Aspen understands that any modifications to our proposed Team during the contract performance period must first be approved by the County Planning and Development Department.

Table 4. Summary of Project Team Roles

Name	Role	Firm	Budgeted Hours	Percent of Total Hours
Jon Davidson	Project Manager	Aspen Environmental Group	158	7.8
▪ 35 years of CEQA and NEPA experience ▪ Project Manager for multiple transmission line and substation EIRs		▪ Project Manager, Ocotillo Wind Energy Facility EIR/EIS ▪ Project Manager, Tehachapi Renewable Transmission EIR/EIS		
Stanley Yeh	Deputy Project Manager	Aspen Environmental Group	317	15.4
▪ 19+ years of project management experience, with management role in seven wind energy project EIRs ▪ PM, Tehachapi Wind Resource Area programmatic analysis		▪ Served as PM at the CA Energy Commission for new power plant applications		
Vida Strong	Project Advisor	Aspen Environmental Group	6	0.3
▪ 27 years of CEQA and NEPA experience ▪ Managed Final EIR for the Lompoc Wind Energy Project		▪ Managing two oil project EIRs for the Energy Division ▪ Prior to Aspen, served as Energy Specialist for the Energy Division		
Scott White	Biological Resources	Aspen Environmental Group	23	1.1
▪ 30 years as a consulting biologist in southern California ▪ Significant experience applying expertise to CEQA analysis		▪ Managed avian mortality data collection in the San Gorgonio Wind Resource Area for USGS/BLM study		
Jennifer Lancaster	Biological Resources	Aspen Environmental Group	150	7.3
▪ 18 years of experience in botanical and wildlife field surveys. ▪ Biological resources author for six wind energy project EIRs		▪ Biological resources author for 11 other renewable energy project analyses.		
William Walters, PE	Air Quality, GHG	Aspen Environmental Group	70	3.4
▪ 30+ years of air quality experience ▪ 20+ years of CEQA air quality experience		▪ Completed air quality/GHG emissions CEQA impact analyses for a half dozen wind energy projects.		
Brewster Birdsall, PE, QEP	Air Quality, GHG, Noise	Aspen Environmental Group	68	3.3
▪ 20+ years of air quality, GHG, and noise experience analyses for energy infrastructure projects ▪ Peer review of noise analysis/control plan for the Lompoc Wind Energy Project		▪ Expert review to support the County Planning Commission and Board of Supervisors formal adoption of GHG Emissions Threshold Significance		
Philip Lowe, PE	Hydrology and Water Quality	Aspen Environmental Group	41	2.0
▪ 35 years of experience in hydrology and hydraulics, floodplain analysis, channel erosion and sedimentation analysis ▪ Surface and water resources analyses for two oil projects for the County Energy Division		▪ Preparing water resources analyses for four solar energy project EIRs		
Michael Macko, RPA	Cultural Resources	Aspen Environmental Group	29	1.4
▪ 35+ years of experience in providing cultural/historical studies ▪ specializes in cultural and historical surveys with an emphasis on Native American consultation		▪ Archaeological and historical monitoring in Santa Barbara, San Luis Obispo and Los Angeles Counties		
Joseph Stewart, PhD	Paleontological Resources	Aspen Environmental Group	24	1.2
▪ 40 years of experience in paleontology and 30+ years of experience in the geology and paleontology of California ▪ Involved in the permitting/construction of over 10 power plants		▪ Directed the paleontological monitoring and mitigation program for Path 15 transmission line project		
Michael Clayton	Aesthetic and Visual Resources	Michael Clayton & Associates	364	17.7
▪ 30 years of experience in Visual Impact Assessment ▪ Provides expert witness testimony with regards to visual resources analysis on behalf of the State of California		▪ Conducted reviews of all major linear utility corridors throughout California including Santa Barbara County as part of Western Regional Corridor Study		
Jim Thurber, PG, CEG, CHG	Geology and Soils	Geotechnical Consultants, Inc.	7	0.3
▪ 30+ years of experience in the development, protection, and management of municipal groundwater resources.		▪ Analyzed geology, soils, and seismicity for the Tehachapi Renewable Transmission Project, Sunrise		

Table 4. Summary of Project Team Roles				
Name	**Role**	**Firm**	**Budgeted Hours**	**Percent of Total Hours**
▪ Preparing groundwater resources analyses for two oil projects for the County Energy Division		Powerlink Project, and several renewable energy projects in California		
Aurie Patterson, PG	Geology and Soils	Geotechnical Consultants, Inc.	75	3.7
▪ Project experience includes environmental studies for solar facilities, wind farms, petroleum and water pipelines, power plants, transmission lines		▪ Preparing geology and soils analyses for two oil projects for the County Energy Division ▪ Conducted peer reviews for five wind energy EIRs		
Richard Garland, PE	Transportation and Traffic	Garland Associates	89	4.3
▪ 35+ years of experience in traffic engineering and transportation planning ▪ Conducted traffic impact, transit, parking, circulation, safety, and traffic control studies for numerous projects		▪ Prepared traffic impact analyses for electric power generation facilities, pipeline projects, electricity transmission lines		
Tatiana Inouye	Agriculture/Forestry Resources, Energy, Land Use, Recreation	Aspen Environmental Group	118	5.7
▪ 13+ years of experience preparing EI/EIS analyses ▪ Conducted analysis for the Bogle Wind EIR in Yolo County		▪ Worked on three major transmission line project EIRs, including Devers-Palo Verde No. 2, Antelope-Pardee 500-kV, and West of Devers Upgrade		
Patrick Meddaugh	Fire Hazards, Mineral Resources, Pop/Housing, Public Services, Utilities	Aspen Environmental Group	176	8.6
▪ Conducted analysis for the Bogle Wind EIR in Yolo County ▪ Assisting with ongoing environmental compliance efforts for the Barren Ridge Renewable Transmission Project		▪ Surveyed a series of active wind project sites in BLM's Palm Springs Wind Resource Area to identify potential bird mortalities		

Scott White has 30 years of experience as a consulting biologist in southern California. He is an expert with southern California plants and has extensive experience evaluating habitat suitability and project impacts for special-status wildlife species. He has worked with project applicants, lead agencies, and wildlife agencies to prepare CEQA and NEPA analyses, as well as state and federal Endangered Species Act consultation and streambed and wetland permitting. He has managed and authored biological resource surveys and analysis for wind projects in Kern and Riverside counties. He also has coordinated extensively with the wildlife agencies to evaluate potential hazards of renewable energy projects to birds, for compliance with the Migratory Bird Treaty Act, Bald and Golden Eagle Protection Act, and California Fish and Game Code nesting bird regulations. For example, Scott managed Aspen's avian mortality data collection in the San Gorgonio Wind Resource Area for a joint USGS/BLM study; he evaluated mortality monitoring data for two large solar projects in San Luis Obispo County to determine significance of avian impacts; under our contract to the CPUC he worked with wildlife agencies and SCE to develop a nesting bird management plan for a major transmission line upgrade project; and he coordinated among wildlife agencies and California Energy Commission engineering staff to evaluate the bird hazard from concentrated solar energy of then-proposed concentrating solar power-tower projects. Mr. White provides expert witness testimony and supports client legal staff in case review and preparation of briefs. He has extensive experience with federal, state and local agency coordination, and he has published a number of studies in professional literature.

Jennifer Lancaster has 11 years of experience managing and preparing documents in compliance with CEQA and NEPA. She also authors biological resources sections for IS/MNDs, EAs, EIRs, EISs, and joint CEQA/NEPA documents, as well as biological technical reports. Ms. Lancaster is also experienced with supporting agency clients through the Section 7 process and compliance with the federal and California Endangered Species Acts, as well as participating in environmental policy working groups on behalf of agency

clients. She has 18 years of experience in botanical and wildlife field surveys and report preparation. Her biological background includes native habitat restoration, rare plant field studies, laboratory analysis, experimental design, logistical support for field surveys, and teaching at the college level. Ms. Lancaster prepared the biological resources analyses for six wind energy development projects in Kern County (five EIRs and one EIR/EIS) and is also the author of the biological resources analyses for two oil and gas redevelopment projects in Cat Canyon in Santa Barbara County currently undergoing CEQA. Her extensive experience with renewable energy projects as well as her recent, local experience in Santa Barbara County ensures she has the expertise to address impacts to biological resources for the Strauss Wind Energy Project.

William Walters has over 30 years of experience in air quality impact analysis and nearly 15 years of experience in greenhouse gas (GHG) emissions/climate change impact analysis. He has also completed air quality and GHG/climate change CEQA or CEQA/NEPA assessments for over 40 power plant projects, including over 30 power plant projects for the California Energy Commission (CEC), several power plants for County Planning Agencies, and over a dozen total renewable energy power plant projects; including six wind energy power plant projects. He has provided expert witness testimony for air quality and GHG emissions/climate change for several CEC projects. He has also completed air quality and GHG/climate change CEQA or CEQA/NEPA analyses for dozens of other large infrastructure projects for local, State, and federal agencies.

Brewster Birdsall, MS, PE, QEP, has 24 years of consulting experience focusing on climate change, air resources, and air quality and noise-impact modeling. He routinely supports decision-makers on the issues of energy facility siting and infrastructure planning. Recent relevant experience in Santa Barbara County includes his ongoing work in conducting the air quality and GHG analyses for the ERG West Cat Canyon and Aera East Cat Canyon oil field development EIRs and providing expert review of the GHG Santa Barbara County CEQA threshold-setting process for GHG. He also provided the peer-review of noise analysis and control plan for the previously proposed Lompoc Wind Energy Facility. His work covers a diverse range of proposed actions involving the oil and gas sector, electric transmission, and renewable and conventional power plant development.

Philip Lowe, PE, a registered professional engineer with experience preparing hydrological analysis, drainage studies, and surface water and ground water impact analysis for a wide variety of public works and other projects including several renewable power generation and transmission projects in California and Arizona, and recent projects in Santa Barbara County. His recent Santa Barbara County experience includes the West Cat Canyon Revitalization Plan and Aera East Cat Canyon Oil Field Redevelopment plan near Sisquoc. Renewable energy experience includes the Aurora Solar Energy Generating Project in San Bernardino County, California, the Antelope North Solar Energy Generating Project in Los Angeles County, California, the SES Solar Two project in Imperial County, California, and the Palen Solar Project in Riverside County California. His additional power generation and transmission experience includes the Devers to Palo Verde transmission line in Arizona and California, the Cosumnes Power Plant Staff Assessment for the California Energy Commission, the Tracy Peaker Power Plant Staff Assessment for the California Energy Commission, the SONGS/Diablo Canyon nuclear power plant projects on the California coast, and several other transmission line projects throughout central and southern California. He has prepared hydrologic studies, drainage feasibility analysis and drainage concept design for a variety of public works projects including solar power plants, transmission lines, and flood control and riparian restoration for the U.S. Army Corps of engineers. In addition to his water resources experience, Mr. Lowe is educated in wildlife ecology and watershed management. Philip has more than 35 years of experience in surface water analysis, including 25 years providing CEQA and NEPA evaluations on surface water resources.

Michael Macko, RPA, is an archeological and cultural resources professional with more than 35 years of experience in providing cultural and historical studies, master project plans, field study research, and agency

coordination for numerous projects. He specializes in cultural and historical surveys with an emphasis on Native American consultation. He holds many professional titles and special training, well as publications and cultural resource management reports. He has designed and implemented projects involving all phases of cultural resource field studies (preparation of research designs and treatment plans and conducting records and collections research, and survey and excavations from small and simple to large and complex). He has managed project budgeting, staffing, subcontracting, agency and tribal coordination, permit approvals, and all aspects of necessary research.

Joseph Stewart, PhD, is a vertebrate paleontologist with 40 years of experience in paleontology and more than 30 years of experience in the geology and paleontology of California. He has been involved in the permitting or construction of more than ten power plants and directed the paleontological monitoring and mitigation program for Path 15, a major transmission line project. His publications include more than 40 peer-reviewed articles in books and journals. His research specialties are fossil fishes and Pleistocene vertebrate faunas, especially those of California deserts.

Michael Clayton has 30 years of experience in the fields of Visual Impact Assessment, Environmental Impact Analysis, and Energy and Utility Planning. Over the course of his career, Mr. Clayton has conducted more than 300 visual impact assessments using a variety of visual assessment methodologies applicable to application to energy, infrastructure, and resource development projects on public and private lands. Michael has experience with the: (1) U.S. Bureau of Land Management's Visual Resource Management System including conducting Visual Resource Inventories and Contrast Rating Analyses; (2) U.S. Forest Service's Visual Management System; (3) Forest Service's newer Scenery Management System; and (4) California Energy Commission's Visual Resources Methodology, which he helped develop. Mr. Clayton developed and has implemented the Visual Sensitivity – Visual Change methodology for use on non-federal public lands and private lands. Examples of projects include wind energy and re-power projects, solar energy facilities, transmission lines and substations, combined cycle power plants, telecommunications projects, water conveyance and storage facilities, pipelines, roads, seawater desalination plants, and wastewater treatment plants. Mr. Clayton also provides expert witness testimony with regard to Visual Resources Analysis on behalf of the State of California and has received awards from public agencies and professional organizations for the quality of his visual resources analyses in 2001, 2004, 2009, 2010, and 2013.

James Thurber, PG, CEG, CHG, leads GTC's geologic and hydrogeologic efforts. He brings with him over 30 years of experience and an in-depth knowledge of the development, protection, and management of municipal groundwater resources and analysis of environmental issues related to geology, geologic hazards, soil and erosion, surface water and groundwater. He is actively involved in engineering geology, hydro-geology, and hazardous material assessments for planning and design of new projects. These projects include long linear pipelines and transmission lines, dam sites, tunnels, power plants, highways, schools, and large redevelopment projects. He has conducted environmental assessments and prepared documentation for Geology, Geologic Hazards, Soils, Seismicity and Hazardous Materials sections for several local and regional EIRs/EISs. Mr. Thurber has worked with other specialists on numerous CEQA/NEPA studies to analyze potential project impacts. He has assessed site conditions regarding past and current use of hazardous materials and environmental contamination. Recent Santa Barbara County project experience includes working with Aspen on the Aera East Cat Canyon Oil Field Redevelopment Plan EIR and ERG West Cat Canyon EIR.

Aurie Patterson, PG, has 24 years of experience managing and preparing technical sections for CEQA and NEPA environmental documents for oil field development, transmission lines, utility-scale solar facilities, wind farms, public facilities and buildings, power plants, schools, and pipelines. Ms. Patterson has provided peer review of applicant's geologic reports in order to identify data gaps, inadequacies, and deficiencies in the applicant's environmental documents and to ensure the adequacy of the geologic documents for use in

preparing EIR sections. Ms. Patterson has performed data research, aerial photo interpretation, site inspection, and analysis for geologic/geotechnical hazards, faulting and seismic hazards, hazardous materials, groundwater, and mineral resources. Her project experience includes environmental studies for oil field development, solar facilities, wind farms, petroleum and water pipelines, power plants, transmission lines, communications systems, transportation, schools, and redevelopment projects. She has prepared Phase I Environmental Site Assessments for large solar facilities and long linear transmission projects. Recent Santa Barbara County project experience includes working with Aspen on the Aera East Cat Canyon Oil Field Redevelopment Plan EIR and ERG West Cat Canyon EIR.

Richard Garland, PE, is a registered traffic engineer in the State of California and is the president of Garland Associates. He will be responsible for conducting the traffic/transportation analysis for the environmental document. Mr. Garland has over 35 years of experience in traffic engineering and transportation planning and has prepared the transportation component of hundreds of CEQA documents. He has conducted traffic impact, transit, parking, circulation, safety, and traffic control studies for numerous projects ranging from individual developments to regional planning efforts. Mr. Garland serves clients in both the public and private sectors, including state and federal agencies, local city and county governments, regional planning agencies, utility companies, school districts, transit companies, ports, airports, and private entities. He has extensive experience in the planning and analysis of roadways and other transportation systems throughout southern California. He has prepared traffic impact analyses for electric power generation facilities, pipeline projects, electricity transmission lines, commercial developments, military bases, ports, and schools. Included among this experience is a Los Angeles Department of Water and Power construction project at the Valley Generating Station in Los Angeles; the Pacific Pipeline project in Santa Barbara, Kern, and Los Angeles Counties; the Devers-Palo Verde power transmission line project in Riverside County; the Alturas Transmission Line project in northern California and Nevada; and cogeneration power plants in San Diego and Chino.

Tatiana Inouye has over 13 years of experience in environmental analysis for CEQA and NEPA compliance, specifically in the areas of land use and planning, agriculture, recreation, and aesthetics. She has completed issue area analyses for small-scale and utility-scale solar generating projects, as well as localized wind energy projects. Ms. Inouye has prepared coastal consistency determinations for the following: Alamitos Energy Center Land Use Assessment; 10 Federal Oil and Gas Leases Offshore Ventura, Santa Barbara, and San Luis Obispo Counties; and SCE's Tower Replacement Project in the Port of Long Beach. Ms. Inouye has also completed visual resource analyses for the California State Land Commission's SONGS Decommissioning Project EIR, as well as San Diego Unified Port District's Bulk Cement Warehouse and Loading Facility Project.

Patrick Meddaugh is a multi-disciplinary environmental scientist with 5 years of experience preparing CEQA and NEPA documents, reports, and analytical technical studies for a variety of large-scale infrastructure, energy, telecommunications, and civil works projects. Through his work, Mr. Meddaugh serves as a technical specialist with experience in Hydrology/Water Quality, Hazards and Hazardous Materials, Geology and Soils, Mineral Resources, Public Services, Utilities and Service Systems, Socioeconomics, Environmental Justice, Alternatives, Cumulative Projects, and construction-design issues. His experience also includes preconstruction surveys and construction compliance monitoring. Mr. Meddaugh has recently prepared technical sections for several CEQA/NEPA documents for federal, State, and local agencies, with examples including the SONGS Decommissioning EIR, Bogle Wind Turbine Project, West Cat Canyon Revitalization Plan, and Hermosa Beach Transpacific Fiber Optic Cables Project EIR.

4. Study Methodology

Aspen's study methodology includes ten tasks, consistent with the deliverables and schedule provided on pages 16 and 17 of the RFP. Our overall study methodology maximizes use of the applicant-provided studies and application materials to eliminate any unnecessary or redundant data collection and review. Following review of materials, data inquires will be provided to the applicant so that they can furnish the additional information required to complete a legally defensible EIR Supplement. Aspen's approach also includes attendance at project meetings, a public comment hearing on the Draft EIR Supplement, and Planning Commission and Board of Supervisors hearings.

Aspen will prepare an EIR Supplement consistent with the format identified in the RFP and in accordance with the timeline provided in the RFP (see Section 5 of this proposal). We will provide the County with a streamlined but thorough assessment of the project, one that is legally and technically defensible. Aspen will use site maps and graphics as needed to prepare an easily understood and CEQA-compliant document.

The Aspen Project Manager will be available to attend staff meetings requested by the Energy & Minerals Division staff. Up to five meetings with County staff are assumed through Final EIR Supplement preparation. Our accompanying cost proposal, submitted separately, provides unit costs for additional meetings by our Project Manager and technical specialists. Sections 4.1 and 4.8 of our Study Methodology present assumptions regarding the Aspen Project Manager's attendance at Scoping, Planning Commission, and Board of Supervisors meetings.

4.1 Task 1 – Project Description, Environmental Setting and Alternatives

A Project Description will be prepared for the proposed Strauss Wind Energy Project (SWEP) with sufficient detail to allow for thorough evaluation in the EIR Supplement. The Project Description will be derived from information provided by the applicant, including in application materials and responses to questions from the County and Aspen team. Aspen will use the applicant's materials and graphics to the maximum extent feasible to prepare the Project Description. The Project Description will identify the applicant, the applicant's objectives, and federal, State and County permitting requirements. The description will include the project's location, including a listing of all affected parcels and their current General Plan land use designations and zoning. A discussion outlining the applicant's proposed measures to reduce environmental impacts, as identified in the various technical studies, also will be included to ensure that readers understand what environmental controls have been incorporated into the project design. All components of the proposed project will be addressed, including the wind turbine generators, new access roads, improvements to existing roads, on-site substation and electrical collection system, 115-kV power line connecting to PG&E's Cabrillo Substation, upgrades to the Cabrillo Substation, fiber-optic communication system, and on-site meteorological towers.

The Environmental Setting will provide a narrative of the project area's existing conditions, from which the EIR Supplement's "baseline" discussion for each resource and issue area will be built. The text will describe the proposed project area's geography and topography, climate, transportation network, aesthetic qualities, land use patterns, habitat types, surface water hydrology, and other topics relevant to the resources and issues to be addressed in the EIR Supplement. Aspen's Project Manager and certain resource specialists will conduct a site visit, with prior approval of and coordination with the County and applicant, to confirm site conditions.

As noted in the RFP, the EIR Supplement will consider the No Project Alternative, a reduced alternative, and other alternatives as needed to address significant impacts. Aspen's Project Manager will work closely with Energy & Minerals Division staff and, based on initial consideration of potential significant impacts, determine if any other alternatives should be considered. Consistent with CEQA, the alternatives will be evaluated in lesser detail than the proposed project.

The Project Description, Environmental Setting, and description of project alternatives will be submitted to the County within 45 working days of the notice to proceed with work. Aspen will provide this deliverable in electronic format either on compact disc or by email.

As described on page 16 of the RFP, the County will take the lead in preparing the Notice of Preparation (NOP) for the EIR Supplement and conducting the scoping meeting. It is assumed that the County will prepare and distribute the NOP and make necessary arrangements for the scoping meeting. The Aspen Project Manager will attend the project scoping meeting, if it scheduled after Aspen under contract.

4.2 Task 2 – Administrative Draft EIR Supplement and Technical Studies

The EIR Supplement will address all aspects of project construction, operation, and maintenance, and will consider all components of the proposed project, including the wind turbine generators (WTGs), substation, operations and maintenance building, electrical collection lines, meteorological towers, access roads, public road improvements, and 8.6-mile 115-kV power line for generation interconnection. The impacts of these project components and activities will be determined by comparing forecast environmental conditions with the project to existing environmental conditions without the project.

Aspen will prepare an EIR Supplement that will address all the issue areas in Appendix G of the State CEQA Guidelines (per instruction on page 4 of the RFP), but with the focus on issue areas with the potential for significant impacts. The section of this Study Methodology presented below provide Aspen's methodology for each of these issue areas. Sections 4.2.9 through 4.2.11 provide our technical approach for cumulative impacts, alternatives, and policy consistency analysis, respectively. In addition, a discussion of less-than-significant effects and other CEQA considerations is provided in Section 4.2.12. We will address all required elements in the EIR Supplement and will prepare an outline consistent with the County's desired format for the document as part of this task. We will use available applicant-provided studies in preparing the EIR Supplement, as well as any other useful information supplied by the applicant, and we will use the County's "Environmental Thresholds and Guidelines Manual" (2015) and other recently adopted requirements and regulations for the impact evaluation.

Each technical resource analysis section will address existing environmental conditions in the affected area, identify and analyze environmental impacts of construction and operation of the proposed SWEP and recommend mitigation measures to reduce or avoid adverse impacts anticipated from project construction and operation if needed. In addition, existing relevant laws and regulations, and environmental significance thresholds will be described for each issue area. In some cases, compliance with existing laws and regulations may reduce or avoid certain impacts that might otherwise occur from implementation of the project. The impact analysis also will consider all applicant-proposed measures to reduce impacts, as well as other applicable County standards and conditions of approval.

For significant adverse impacts, feasible mitigation measures will be proposed to reduce or avoid these impacts. Mitigation measures will be clearly numbered to correspond to their respective impact criteria. The effectiveness of each mitigation measure will be discussed, and the level of impact significance after mitigation is applied will be identified.

Aspen will submit the Administrative Draft EIR Supplement to the County for review and comment as one reproducible unbound copy, three bound copies, and one electronic copy on CD or DVD. All printed bound versions of the EIR Supplement, including the Administrative Draft EIR Supplement, will be printed double-sided on recycled paper and will be comb bound. All electronic submittals prepared in Adobe Acrobat format will be divided into chapters and files will be in sizes that are compatible with Planning and Development's computers and readily downloadable to the County's website. The Administrative Draft EIR Supplement and appendices will be submitted to the County within 105 working days after the notice to proceed.

Aesthetics/Visual Resources

Background/Issues

The Aesthetics/Visual Resources general approach will draw extensively from existing information contained in the Visual Resources Technical Report (VRTR) and Lompoc Wind Energy Project (LWEP) Final EIR as deemed appropriate following peer review and field verification. Peer review will focus on analytical conclusions, including project visibility and anticipated visual impacts resulting from implementation of the proposed project. The peer review conclusions will be supported with digital terrain assessments for each KOP. The results of the digital terrain assessments will be utilized in the Administrative Draft EIR Supplement task as well to support project visibility and impact conclusions. In general, new, independent analyses and documentation will augment existing data only as necessary and will focus only on the viewpoints critical to the understanding the project's visual impacts, such as public views from sensitive coastal locations, Highway 1, local roads, important cultural features, and the City of Lompoc.

Of particular importance will be: (a) differences between the LWEP Final EIR and the proposed project (e.g., revised locations of the fewer but taller WTGs and deviations in the previously approved LWEP environmentally superior alternative route); and (b) changes in environmental and regulatory settings. This approach will ensure that the aesthetics/visual resources section of the EIR Supplement contains the information necessary to make the previous LWEP Final EIR adequate for the proposed SWEP.

For the purposes of this scope of work and based on a preliminary review of the project, it is assumed that a maximum of six (6) of the original thirteen (13) KOPs would be carried forward for the EIR Supplement analysis and that a maximum of three (3) revised visual simulations may be necessary as well.

Environmental Setting

The environmental setting will draw substantially from data contained in the VRTR and LWEP Final EIR. This information will be peer reviewed for appropriateness and field verified. Specifically, the project study area will be viewed from various public roads and vantage points to verify the overall characterization of the existing landscape character, visual quality, and viewing conditions as presented in the previous documents. Each representative KOP will also be field reviewed to verify the existing visual quality, viewer concern, and viewer exposure. New existing conditions photographs will also be obtained if new visual simulations are to be prepared for the impact analysis (see below). Under the VS-VC System to be employed for this analysis, a concluding assessment of overall landscape visual sensitivity (susceptibility to an adverse visual outcome) will be made for each KOP. A landscape with a high degree of visual sensitivity is able to accommodate only a low degree of adverse visual change without resulting in a significant visual impact. A landscape with a low degree of visual sensitivity is able to accommodate a higher degree of adverse visual change before exhibiting a significant visual impact. Overall visual sensitivity is derived from a comparison of existing visual quality, viewer concern, and viewer exposure. The environmental setting discussion developed under the VS-VC method will blend seamlessly with the previous LWEP Final EIR setting discussion.

Impacts and Mitigation Measures

Under the VS-VC System, overall visual change is determined at each KOP based on an assessment and equal weighting of project-induced visual contrast, project dominance, and view blockage (or view impairment) and an evaluation of a visual simulation of the proposed project. The overall visual change is a concluding assessment as to the degree of change that would be caused by a project and can range from low to high. In some cases, however, where view blockage is reduced by a project, overall visual change may be improved. The analysis will also discuss the visual changes caused by the proposed widening of San Miguelito Road; however, but no simulations of the widened road will be prepared.

Overall visual change is then considered within the context of the determined overall visual sensitivity of the existing landscape and viewing dynamics. Impact significance at each KOP would then be rated based on the thresholds of significance derived from the significance criteria contained within Appendix G of the State CEQA Guidelines and the *Santa Barbara County Environmental Thresholds and Guidelines Manual*. Where appropriate, feasible mitigation measures would be identified to reduce or eliminate any significant visual impacts of the proposed project and alternatives per guidance contained in the Santa Barbara County Guidelines for Implementation of CEQA, as amended. Again, the impacts and mitigation measures section of the EIR Supplement will be tailored to blend seamlessly with the previous LWEP Final EIR analyses.

Agriculture and Forestry Resources

Background/Issues

The agricultural and forestry analysis will discuss the SWEP's impacts to agricultural resources, such as designated Farmland, agricultural productivity, and agricultural preserve programs. The SWEP site and surrounding area do not contain forest land or forestry resources (e.g., timberland); as such, this analysis will focus entirely on agriculture. The following thresholds from the State CEQA Guidelines Appendix G and the County's Environmental Thresholds and Guidelines Manual will be utilized to determine significant effects:

- Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the FMMP of the California Resources Agency, to nonagricultural use;
- Conflict with existing zoning for agricultural use, or a Williamson Act contract; and
- Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to nonagricultural use.

Environmental Setting

The SWEP site is located in a rural area of the County that is zoned for agriculture (AG-II-100: minimum 100-acre parcel size). All of the parcels within the site are currently under Williamson Act Agricultural Preserve contracts. The Department of Conservation has designated the majority of the project area as Grazing Land, with a portion of the project area designated as Farmland of Local Importance along San Migeulito Road.

Impacts and Mitigation Measures

The types of agricultural impacts resulting from construction, operation, and decommissioning of the SWEP would be similar to those described in Section 3.3 of the LWEP Final EIR. However, this analysis will consider whether the greater temporary and permanent ground disturbance acreages for the SWEP would require mitigation to reduce adverse effects to a less than significant level. Possible mitigation would include coordination with property owners of active farmland to minimize damage to agricultural operations.

In 2006, the County's Agricultural Preserve Advisory Committee determined that the LWEP was a compatible use with applicable Agricultural Preserve contracts. This analysis will discuss whether the SWEP will continue to be a compatible use under existing Williamson Act contracts, or whether the applicant must coordinate with the Department of Conservation regarding acquisition and subsequent termination of these contracts.

Air Quality

Background/Issues

The previous EIR found that the LWEP would have less-than-significant impacts after the implementation of off-road equipment exhaust and fugitive dust mitigation measures (Mitigation Measures AQ-1 and AQ-2), and the operation impacts are less than significant. The applicant's Air Quality and Greenhouse Gas Emissions Technical Report makes the same determination for air quality impacts. However, the technical report does recommend a few changes to these two mitigation measures. We understand that this technical report will be revised to address Santa Barbara County Air Pollution Control District (SBCAPCD) comments and resubmitted. We also understand that one of the first actions in completing the air quality assessment is to perform a peer review this technical report and where necessary to amend the analysis or emissions estimates. In order to complete any updates to the emissions estimates (air pollutant and GHG emissions) quickly and efficiently, in the budget estimate provided, it is assumed that all emissions calculation CalEEMod input files and any separate spreadsheet emissions calculations (i.e., helicopter emissions) will be provided by the project applicant in the proper format for editing.

An initial review of the emissions estimate finds that many on-road vehicle types have been misclassified as off-road equipment (dump trucks, concrete trucks, pickup trucks, and line trucks), which overestimates the off-road equipment emissions. It is unclear if this misclassification of equipment also affected the emissions of on-road motor vehicle trips, although an initial review indicates that trip rates may be reasonable, with the potential exception of worker trip estimates.

Environmental Setting

The environmental setting for air quality has not changed significantly since the completion of the previous EIR. However, any changes in the environmental setting, including the regulatory setting, that are relevant to the assessment of project impacts will be summarized in the EIR Supplement. The setting information will draw from or reference the discussions provided in the technical study where complete and accurate. The changes since the previous EIR include updates to the air quality attainment plans, changes in ambient air pollutant attainment status, and new local or state regulations that may affect the project's construction or operation emissions.

Impacts and Mitigation Measures

The air quality section will summarize any changes to the severity of impacts described in the previous EIR. However, if there are no new significant impacts or new or changes recommended to the mitigation measures then a brief statement to that effect will be included in the EIR Supplement. The current version of the applicant's Air Quality and Greenhouse Gas Emissions Technical Report currently does recommend changes to the mitigation measures in the previous EIR, summarized as follows:

- AQ-1: Construction Equipment Emission Reduction Plan – This mitigation measure is proposed to be updated to require off-road construction equipment to meeting CARB/EPA Tier 3 or better engine standards, with other minor associated modifications. This revision is appropriate given how the equipment fleet standards have changed over time with increasingly stringent model year engine emissions standards for off-road equipment. Additional high-engine tier-conforming revisions, such as removing "g. Engine Timing", may be necessary.

- AQ-2: Dust Control Plan – This mitigation measure is proposed to be updated to require three-time daily watering, increased from two times daily, among other minor changes.

The applicant's recommended changes to the previous mitigation measures will be reviewed and where necessary modified to ensure these measures provide adequate levels of air pollutant emissions control.

Biological Resources

Background/Issues

The 2008 Final EIR for the LWEP identified several significant biological resources impacts which would be mitigated to less than significant (Class II impacts), and one impact that would remain significant with incorporation of feasible mitigation (Class I impact). In general, the SWEP is likely to have comparable Class II impacts, including:

- impacts to listed and other special-status species
- removal and degradation of sensitive habitats including wetlands and seeps
- native tree removal
- introduction and spread of invasive species, disturbance to nesting birds

In addition to these, the SWEP proposal includes grading for access routes within the Coastal Zone, which is likely to introduce need for additional analysis and perhaps mitigation for certain biological resources. Additionally, the revised project would have an increased impact on native oak trees, probably necessitating more extensive analysis and mitigation.

Perhaps most important, the 2008 LWEP Final EIR identified bird and bat collision risk with WTGs as a Class I Impact because an unknown number of protected birds and bats may be killed during operation of the facility. We believe that bird and bat morality will be the most difficult biological resources issue in the analysis of the SWEP.

The 2008 Final EIR identified a series of mitigation measures for bird and bat morality:

- BIO-15a: Siting
- BIO 15b: Appropriate WTG and Project-Element Design
- BIO-16a: Before-After/Control Impact Study
- BIO 16b: Bird/Bat Mortality Study
- BIO 16c: Reduce Prey Base Near Turbines
- BIO 16d: Adaptive Management Plan

Additionally, a condition for WTG shutdown to prevent potentially foreseeable large-scale bird or bat mortality events was added upon certification of the Final EIR. With this additional condition, the County concluded that no other feasible mitigation measures were known for the WTG collision impact, that significant impacts would remain, and adopted a finding of overriding considerations.

Since the 2008 Final EIR and the 2009 Board of Supervisors action approving the LEWP, public attention and wildlife agency policy have increasingly focused on bird and bat mortality from renewable energy projects. Examples include a National Geographic Magazine article (2014) and the U.S. Fish and Wildlife Service Land Based Wind Energy Guidance (2017). Newer projects, typically consisting of fewer, larger WTGs than older projects, were originally thought to reduce the risk to birds and bats, but some evidence suggests that the taller WTGs may increase risk due to their height. However, avian mortality monitoring of renewable energy

projects can be problematic because field surveys are labor intensive, bird carcass are often cryptic, wildlife tend to remove the carcasses quickly, and field data tend to produce sample sizes too small to identify statistically significant conclusions.

The applicant has prepared a new Biological Resources Technical Report (BRTR), which is currently being revised to address comments made by the County's biological reviewer and to incorporate additional survey data that is being collected this spring/early summer. Aspen assumes that all County comments will be addressed in the revised report, which will be made available to Aspen upon initiation of the CEQA review process. The applicant's 2017 BRTR adds very little information to the much more extensive baseline data provided for the 2008 Final EIR.

Aspen's biology team understands the bird and bat collision/mortality issues from the perspective of environmental analysis, field data collection, wildlife agency coordination, risk evaluation, and data analysis. Aspen has analyzed potential avian and bat mortality hazards for multiple CEQA documents. We have reviewed extensive mortality monitoring data and collaborated with CDFW and the San Luis Obispo Planning Department to identify threshold criteria for CEQA significance and adaptive management. Also, we conducted the field surveys for a USGS/BLM pilot study regarding planning and implementation of mortality analysis in the San Gorgonio Wind Resource Area. We believe that we bring exceptional breadth of experience with this issue.

Environmental Setting

Aspen will review the environmental setting for biological resources in the LWEP Final EIR and update it to reflect current conditions. Aspen will independently review the applicant's revised Biological Resources Technical Report as a basis for the updated environmental setting in the EIR Supplement. We propose the following tasks to develop the setting:

- Aspen biologists will peer review the applicant's revised Biological Resources Technical Report, Inventory of Trees, and Tree Removal Analysis in the Coastal Zone, and will provide the County with a memorandum documenting the results of our review, any deficiencies identified, and recommendations for changes or supplemental work needed to support the EIR Supplement analysis.
- Two Aspen biologists will conduct a 2-day site visit to verify the information presented in the applicant's reports, and to familiarize themselves with the site in order to update the environmental setting in the EIR Supplement.
- Aspen biologists will conduct a review of relevant literature; database records; current local, state, and federal regulations; and other background materials to ensure that the environmental setting reflects the most current available information.
- Aspen biologists will prepare the environmental setting in the format provided by the County, which will address existing conditions at the project site, along the portions of San Miguelito Road to be widened, at the Cabrillo Substation, and along the 115-kV power line route, including associated access roads and pull sites.
- Aspen's biologists will coordinate with the County, USFWS, and CDFW to update the regulatory setting to fully incorporate current state and federal policies regarding Coastal Zone management, bird and bat mortality, and native trees.

Impacts and Mitigation Measures

The impact analysis will address all components of the proposed project, including on-site facilities, such as the wind turbine generators, access roads, substation, electrical collection system, and meteorological

towers, as well as off-site facilities, such as the 115-kV power line and associated access road and pull sites, and upgrades to the Cabrillo Substation.

Listed and Other Special-Status Species. Aspen will analyze impacts to special-status species, including federally and state-listed species, from the proposed SWEP. The impact analysis will include any new information obtained on species distribution at and near the site, and will include an assessment of potential impacts on all listed species considered in the LWEP Final EIR:

- Gaviota tarplant
- Gambel's water cress
- Lompoc yerba santa
- Seaside bird's beak
- El Segundo blue butterfly
- Vernal pool fairy shrimp
- California tiger salamander
- California red-legged frog
- Unarmored threespine stickleback
- Steelhead
- California condor
- Southwestern willow flycatcher

The analysis will also assess impacts to other special-status species including but not limited to peregrine falcon (state-listed endangered at the time of the Final EIR publication, but delisted in 2009), Kellogg's and mesa horkelia, coast horned lizard (formerly known as California horned lizard), northern California legless lizard (formerly known as silvery legless lizard), San Diego desert woodrat, and American badger. Impacts to nesting birds during construction and operation will be assessed. Mitigation measures will be revised or created as needed to avoid, minimize, and mitigate impacts to the extent feasible.

Habitat Loss and Sensitive Vegetation. Impacts from the SWEP will be quantified (permanent and temporary), and direct and indirect impacts will be thoroughly described. Sensitive vegetation that may be impacted includes native grasslands, tanoak forest, sawtooth golden bush scrub, coastal sage scrub, coast live oak woodland, and riparian habitats. Jurisdictional wetlands, seeps, and drainages may also be affected, and Aspen understands that a jurisdictional delineation is underway by the applicant. In addition, a large number of native trees including coast live oak, tanoak, arroyo willow, red willow, toyon, and canyon live oak were documented in the project area. The County's biological consultant noted a discrepancy between reported numbers of trees that would be removed among several of the applicant's reports submitted for the application, and Aspen understands that the applicant is resolving the discrepancy. The impact assessment will include a quantification of affected trees, and appropriate mitigation will be developed for impacts to native trees and vegetation that is consistent with the Santa Barbara County Comprehensive Plan, Oak Tree Protection in the Inland Rural Areas of Santa Barbara County, and other applicable plans, policies, and ordinances. We expect this mitigation will follow the approach in the LWEP Final EIR, but will revise measures as needed to mitigate the impacts of the currently proposed project. As noted in the RFP, we will identify applicable PG&E avoidance and protection measures to be re-framed as mitigation measures for the proposed gen-tie route.

Bird and Bat Collisions with WTGs. The proposed SWEP would construct and operate fewer, larger WTGs than the LWEP. Over the last 10 years, a substantial number of modern wind energy facilities have been constructed in California. Post-construction monitoring programs have obtained valuable data on the variables affecting collision risks, the correlation between pre-construction bird and bat use data and the observed collision rates post-construction, and the effectiveness of various adaptive management measures. Aspen biologists have participated in several post-construction bird and bat mortality monitoring studies and have current knowledge and insights into these issues. Our team will re-evaluate the proposed project's potential impacts from WTG collisions to reflect changes from the originally analyzed project as well as to incorporate the most current knowledge and data on collision risks. We will revise the adopted LWEP mitigation measures as needed to reflect the current understanding of risks and the most effective

avoidance and minimization measures to incorporate into project design, as well as current proven adaptive management strategies to minimize bird and bat mortality to the extent feasible.

Cultural and Tribal Resources

Background/Issues

The California coastal environment has been a densely populated area throughout prehistory and history, and this is especially the case in the Lompoc area. Key cultural resources of concern in this area often include impacts to prehistoric and historical archaeological sites, historical elements of the built environment, and ethnographically important places. The applicant submitted a Cultural Resources Technical Report (CRTR) prepared by Sapphos Environmental earlier this year. That report is currently being revised by on comments provided by the County. The information in the LWEP Final EIR and in the revised CRTR will provide the basis for the analysis of cultural resources in the EIR Supplement.

As indicated in the RFP, a separate analysis of tribal cultural resources was not included in the LWEP Final EIR because such an analysis was not required at that time. To meet current requirements, tribal cultural resources will be addressed in the EIR Supplement.

Environmental Setting

Aspen has reviewed the applicant's CRTR and the comments on the report made by the County's archaeological consultant, Larry Spanne. The CRTR included a synthesis of results from 16 previous cultural resource surveys conducted within the project area between 1984 and 2012. The records search area included a 0.5-mile buffer around the project area limits. A total of 33 historic resources have been identified within the search area, 29 of which are located within the project area.

As described in the RFP, the CRTR will be revised by Dudek based on Mr. Spanne's comments and other County comments. Mr. Spanne listed five concerns:

- Boundary determinations are needed for sites SBA-2465, P-003939 and P-003937. In addition, intensive pedestrian surveys should be conducted access roads or other improvements not yet surveyed.
- Discussions of sites P-003936 and P-003937 need to be include, as appropriate, in the CRTR.
- Fuller discussions of previous work need to be added.
- Survey needs on private property need to be addressed.
- Additional intensive surveys should be conducted as needed if project changes include areas not previously surveyed.

The revised CRTR will be used to describe existing conditions at the project site regarding cultural resources and it is assumed that the revised report will be adequate for that purpose.

Impacts and Mitigation Measures

Aspen will peer review the revised CRTR for its adequacy in addressing the County's comments and to determine whether it provides the appropriate updated information needed to prepare the impact analysis for the EIR Supplement. Assuming the revised CRTR is adequate, Aspen will use the revised report to complete a thorough analysis of impacts on historical resources and unique archaeological resources per CEQA. The impact analysis will consider resources previously identified on the ground surface, as well as analyze the potential for buried cultural resources using existing geological and hydrological reports. Impacts described in the LWEP Final EIR will be re-evaluated to determine whether they accurately characterize

impacts based on the revised layout and configuration of the SWEP. Impact discussions and significance conclusions will be revised as needed to make them complete, accurate, and up to date.

Section 6.0 of the CRTR identifies three types of project impacts, including impacts related to WTG locations and associated access roads, the 115-kV power line, and the underground collection lines. Aspen will identify and discuss all potential impacts on cultural resources with consideration of all elements of the project and its construction. Other potential impacts may occur that have been subsumed under the three categories above but are not yet located. Such additional impacts could include power line conductor pull sites, widening of San Miguelito Road, equipment and material storage and lay-down locations, road turnarounds, and equipment maintenance yards.

Mitigation measures adopted for the LWEP as well as measures proposed in the revised CRTR will be considered in the EIR analysis and new or revised mitigation measures will be presented in the EIR Supplement as needed to reduce significant impacts to the degree feasible.

A Sacred Lands file search by the Native American Heritage Commission (NAHC) in 2016 did not indicate the presence of Sacred Lands or Traditional Cultural Properties. This coordination with local tribes will be conducted by the County and the results with corresponding mitigation measures will be incorporated into the EIR Supplement as needed.

Energy

It is not anticipated that the SWEP would create a significant impact associated with energy, and the project would have a beneficial effect on generating renewable energy to meet the 50 percent Renewables Portfolio Standard (RPS) procurement requirements established through Senate Bill 350. This section of the EIR Supplement will describe the State's current requirements for renewable energy generation as stipulated in the RPS, including a brief summary of the executive orders and legislation that led up to the current RPS. This section will also discuss whether the applicant has entered into a power purchase agreement for the power that would be generated by the SWEP once it is operational, including identification of the purchaser of the power. It assumed that this information will be provided by the applicant. If a power purchase agreement does not exist at the time of the Draft EIR Supplement, the applicant's anticipated plans for power purchase will be described. This information will be used to determine whether the proposed project is expected to result in similar impacts to Energy Resources as the LWEP.

The SWEP project description identifies several upgrades to PG&E's electrical system that would be necessary to connect the project to this system. PG&E is expected to provide the California Public Utilities Commission with a Notice of Intent to Construct that would address these upgrades. An Interconnection Agreement with PG&E for the project is already in place. Therefore, although the project would result in a need for new systems or substantial alterations to existing power utilities, it assumed that energy-related impacts would not be significant and that the project will contribute to achievement of the State's RPS goals. The full explanation for this conclusion will be presented in the Effects Found Not to be Significant section of the EIR Supplement.

Fire Hazards and Emergency Services

Background/Issues

This section will address the potential impacts of the project which may affect fire and police protection and other emergency services. It is anticipated that impacts associated with the potential for increased population would be discussed elsewhere in document, potentially in either Population and Housing or growth-inducing impacts sections. Therefore, it is assumed that this section will not contain a discussion

regarding population-based impacts on service ratios or performance standards for fire or emergency services.

Since the publishing of the LWEP Final EIR, additional wildfires have occurred in the region, including some of the largest wildfires in California's history. Information related to these fires and the potential for future fires to result in the region that could be attributed to the proposed project will be presented in this section.

Environmental Setting

The project will be located primarily on rural, agricultural land, similar to the location analyzed in the LWEP Final EIR. In general, Vandenburg Air Force Base is located to the south and west, and private property is on the north and east of the proposed project area. The existing location setting will be verified during a site visit. Similar to the LWEP, the proposed SWEP (and portions of the proposed 115-kV) are located within a mapped Fire Hazard Area. Information will include existing and projected levels of service in the region, probabilities of events such as downed powerlines, lightning strikes, Wind Turbine Generator fires, fuel loads, fire prevention, and emergency response plans. Information will be presented in a graphical format where possible to facilitate a better understanding of the nature and likelihood of various safety hazards.

All information will be based on records from other similar wind farms that are in operation and/or from published sources of information, including the information cited in the LWEP Final EIR. Where possible, information will be based on national, State, or local safety standards. It is assumed that this section will be structured similar to the LWEP Final EIR and will focus on: fire hazards in the area (wildfire risk), fire and ambulance services (departments, stations, response times), and police services (departments, stations, response times).

Impacts and Mitigation Measures

Impacts which may occur related to fire hazards and emergency services will be evaluated based on a review of project components, and inputs from agencies responsible for fire protection and other emergency services. Thresholds of significance will be determined based on a review of the County of Santa Barbra Environmental Thresholds and Guidelines Manual, Appendix G of the State CEQA Guidelines, the LWEP Final EIR and in consultation with the County of Santa Barbara. The impact analysis will be structured so that each significant impact has clearly linked appropriate mitigation. Based on a review of the LWEP Final EIR, it is anticipated that mitigation for impacts related to fire hazards and emergency services may include a Fire Protection Plan, prohibitions on smoking and open fires, and/or installation of nonflammable materials around areas of increased fire risk.

Geology and Soils

Background/Issues

The SWEP is similar to the previous LWEP and is located on the same site. Therefore, a EIR Supplement is being completed for the project along with peer review of new technical reports. The project consists of construction and operation of 30 WTGs, construction of new and widening of existing access roads, a communication system, a substation, and O&M building, and an 8.6-mile transmission line. The Geology and Soils Technical Background Report and the Geotechnical Evaluation report prepared by applicant will be reviewed for accuracy and deficiencies and a memorandum outlining findings and recommendations will be completed. The geology and soils section of the EIR Supplement will describe effects related to geology, soils, and seismic hazards that have the potential to be caused by implementation of the SWEP. Existing geology and soils information from the applicant-provided reports and the LWEP Final EIR will be relied on to provide information for the geology and soils section. Additional sources of information may include but are not limited to: geologic and seismic reports and maps published by the U.S. Geological Survey, California Geological Survey; and soil reports and data published by the Natural Resources Conservation Service.

Published journal articles and other online sources also will be researched. The literature review will be supplemented by an analysis of aerial photographs and topographic maps of the area to verify geomorphic features associated with geologic hazards, such as landslides. Geologic and seismic hazards at the project site consist primarily of construction triggered erosion, expansive soil, slope instability and landslides, seismic shaking, and liquefaction.

Environmental Setting

The project is located in western Santa Barbara County in the western Santa Ynez Mountains, southwest of the City of Lompoc. The topography of the project area ranges from gently sloping alluvial fans and stream terraces to moderately to steeply sloping hills and valleys, with elevations ranging from approximately 125 to 2000 feet above sea level. The project area is currently crossed by numerous dirt roads and has several patches of farmed agricultural land.

The project area is primarily underlain by Quaternary alluvium and landslide deposits, Pliocene-Miocene age Sisquoc Formation, Miocene Monterey Formation and Tranquillon Volcanic Formation, Miocene-Oligocene Vaqueros Sandstone, Oligocene-Eocene Gaviota Formation, and Eocene Cozy Dell Shale. Soils overlying these surface geologic units reflect the character of the underlying sediments and likely will be susceptible to erosion. Areas of clayey soils could exhibit expansive characteristics, which could cause damage to facilities due to shrinking and swelling with changing moisture conditions. Landslides occur locally in the Santa Ynez Mountains; small slumps and landslides occur on steeper hillsides. Other unsuitable soil conditions include corrosive soils and erodible soils. Shallow groundwater with depth of 10 to 20 feet is likely with young Quaternary alluvium.

The project area is located in an area of relatively low seismicity in central California. However, the San Andreas Fault Zone is located approximately 60 miles northeast of the project area. Additionally, several significant potentially active Quaternary faults are located within the project vicinity: the Santa Ynez River fault zone, Hosgri fault zone, Lions Head fault zone, Casmalia fault zone, San Luis Range fault system, and the offshore San Lucia Bank fault zone. Despite the presence of these faults near the project, no known active faults cross the project site and estimated ground shaking potential is low to moderate. Liquefaction may occur within saturated alluvial sediments within the project area in the event of local or large regional earthquakes.

Impacts and Mitigation Measures

Geologic and soil conditions will be evaluated with respect to the impacts the project could have on local geology, as well as the impact that specific geologic and seismic hazards and soil conditions may have upon the proposed project. Potential issues in the project area likely will include geologic hazards such as erosion, slope instability, unsuitable soil conditions, and liquefaction. Although seismic hazards such as strong seismic ground shaking are unlikely to occur in the project area, the potential for these impacts will be addressed to provide a comprehensive discussion of this issue as related to seismically induced slope failures. The project is located in areas with moderately to steeply inclined canyon sides where grading for WTG and powerline pole/tower pads, access roads, and other Project related facilities could cause erosion and slope instability.

The significance of all impacts will be determined on the basis thresholds of significance in the State CEQA Guidelines and the County's Thresholds and Guidelines Manual (2008) and will be compared to the impacts identified for the LWEP. Geologic, soils, and seismic hazards for the project will be analyzed based on review of the LWEP Final EIR and supplemental data. Potential effects of the proposed project will be assessed and any new or changed impacts will be discussed and compared to those identified for the LWEP. In order to reduce any identified impacts to less than significant, existing mitigation measures from the LWEP Final EIR, will be incorporated and modified as appropriate or new measures created, to mitigate impacts resulting from construction and operation of the proposed project.

Greenhouse Gas Emissions

Background/Issues

Greenhouse gas (GHG) emissions were not analyzed in the previous EIR. Therefore, the EIR Supplement will need a complete GHG emissions section. The applicant has prepared an Air Quality and Greenhouse Gas Emissions Technical Report. It is understood that this technical report is being revised to address comments from the Santa Barbara County Air Pollution Control District. We will peer review the revised technical report and verify its analysis and conclusions. Specifically, we will review and verify: how this report addresses the Santa Barbara County GHG emissions significance thresholds; and whether all quantifiable project construction direct and indirect emissions sources (water use and land use changes) and indirect emissions reductions (renewable energy production) are included. If significant technical or completeness issues are discovered within this technical report then the applicant may need to update its report to address those issues.

Environmental Setting

A complete environmental setting section for greenhouse gas emissions will be prepared for the EIR Supplement. This setting will provide context and define greenhouse gas emissions and their long-term climate change impacts in general and more specifically as they are forecast for the State of California and Santa Barbara County. Additionally, the regulatory setting will be documented, which will be primarily based on the latest State and local GHG emissions and climate change regulations, plans, and policies.

Impacts and Mitigation Measures

GHG emissions impacts will be analyzed using the two CEQA checklist issues for greenhouse gas emissions. Significance of the project's construction and operation emissions will be addressed using the current published County GHG criteria (Environmental Thresholds and Guidelines Manual). It is understood that this renewable energy project would have long-term beneficial operation impacts related to indirect greenhouse gas emissions reductions. The applicant's technical study, which currently is not analyzed based on the County Significance Threshold for GHG emissions, found that the project would have beneficial GHG emissions impacts. However, the maximum annual construction emissions are estimated to exceed the County's numeric Bright-Line threshold of 1,000 MTCO2e/year. Aspen will work with the County to determine if this short-term exceedance of the Bright-Line threshold might require mitigation and the County's desired form of mitigation. Specific options, which will focus on achieving on-site or County-specific emissions reductions, that might be considered would be:

- Re-Vegetation Projects – Require the applicant to help fund land conservation or carbon sequestration through any ongoing County re-vegetation projects, such as those that may be occurring within recent wildfire burn areas.
- Renewable Diesel – Require the applicant to use renewable diesel or biodiesel blends to fuel the on-site construction equipment and vehicles.
- Other Emissions Offsets – Require the applicant to buy existing carbon offsets (verified GHG reductions from CARB approved offset banks) from local offset projects or fund new local emissions offset projects.

Hazards and Hazardous Materials

Background/Issues

Hazardous Materials. Operation and maintenance of the proposed project would involve limited amounts of hazardous materials, because of the relatively passive nature of wind farms.

- Oil, grease, and ethylene glycol would be used to lubricate and cool the WTGs and ancillary facilities;
- A radiator would dissipate heat and contain a water and ethylene mixture that would be tested annually;
- The gearbox would contain approximately 70 gallons of oil that would not be routinely renewed; and
- Chemicals (to allow and facilitate maintenance and repair) would be stored in tanks or drums (in close proximity) located within secondary containment areas at the designated storage facility.

The primary issues related to hazards and hazardous materials are directly associated with construction activities. These issues include the potential for spills of hazardous materials, interference with emergency response and/or evacuation plans, and fires. Additional hazards associated with wind turbines include thrown rotor blades which can occur as result of rotor failure.

Tower Failure, Blade Throw, Ice Throw, and EMF. The potential exists for a rotor blade to crack or dislocate from the tower of a turbine if a wind turbine experiences excess speed, material fatigue, excessive stresses, or vibration from seismic shaking. Since the proposed project area is located in a region with a generally mild climate, and extreme cold or freezing temperatures are very rare, blade icing and ice throw would not be expected to occur.

Wind turbine designs have included new technologies to reduce the chances of tower collapse or blade dislocation. Setbacks for wind turbines and associated facilities have been developed by agencies to prevent potential hazards to proposed project personnel or individuals in the vicinity of proposed wind projects.

Exposure to electromagnetic fields (EMF) is usually considered a potential issue of concern when associated with the siting of high-voltage (115-kV) overhead power lines in close proximity to residences, and not an issue of concern related to WTGs, which have a predominately low underground voltage (34.5-kV) collection system. The proposed project could potentially site power lines in close proximity to residences.

Worker Safety. Utility and turbine workers operating on wind turbines or power lines would be at risk of electrical shock from either of the systems. The potential also exists for direct impacts to the public resulting from contact with energized equipment.

Flight Navigation. The proposed project site is bounded by Vandenberg Air Force Base (VAFB) on the south and west sides, and is located within VAFB restricted airspace, and would be required to conform to VAFB related aviation requirements. Aspen understands that the applicant has an agreement with VAFB, which establishes policies for evacuation and termination of transmissions of Specified Turbines during launch or pre-launch activities upon notice to do so by the VAFB.

The applicant will be required to coordinate with the Federal Aviation Administration (FAA) to review a Notice of Proposed Construction or Alteration and to receive a determination regarding the project's impact to air navigation. The FAA will also review and determine whether a Lift Plan and WTG Lighting Plan is required. At this time, Aspen understands that additional lighting beyond that identified by the FAA, would not be required.

Environmental Setting

The proposed project will be located primarily on rural, agricultural land. VAFB is located to the south and west, and private property is on the north and east of the proposed project area. The existing location setting will be verified during a site visit and proximity to sensitive receptors, including residences, schools, and roadways will be confirmed.

Information on known safety hazards and regulations that could be attributed to the proposed project will be presented in this section. Information will include probabilities of events such as blade throws and ice throws, zone of influence for various safety hazards, and factors affecting safety hazards such as turbine type, maintenance practices, underground versus overhead electrical collection system, etc. Information will be presented in a graphical format where possible to facilitate a better understanding of the nature and likelihood of various safety hazards.

All information will be based on records from other similar wind farms that are in operation and/or from published sources of information, including the information cited in the LWEP Final EIR. Where possible, information will be based on national, State, or local safety standards.

Impacts and Mitigation Measures

All potential hazards posed to the public by the proposed project will be analyzed by Aspen specialists using accepted standard calculation methods. Potential hazards that will be evaluated include: hazardous materials used during construction activities (including fuels, lubricants, solvents, paints, propane and other hazardous materials), thrown rotor blades, thrown fragments of a rotor blade, thrown pieces of ice or other debris, tower failure, electrical risks at substation, electrical risks from overhead transmission lines, EMF, worker safety, and air traffic safety risks.

Aspen specialists will describe any known sources of contamination in the vicinity of the proposed project site, based on information available in public databases, and the Phase 1 Environmental Site Assessment (ESA) completed by the applicant. The results of database searches and the Phase 1 ESA will be summarized and incorporated into the description of the baseline conditions for the proposed project.

Aspen understands the proposed WTGs would be equipped with leak-proof gaskets, and possible leakage or spillage during WTG operation and maintenance would be confined within the towers. Use of extremely hazardous materials is not anticipated, and storage and use of hazardous materials would be subject to a Hazardous Materials Management Plan approved by the Santa Barbara County Fire Department (included as mitigation measure in the LWEP Final EIR). Additional mitigation measures may include the installation of a sign listing pertinent contacts to notify in the event of a spill during vehicle refueling, avoiding sensitive areas during fueling, and the maintenance of construction equipment to minimize operational losses of hazardous materials to reduce the risk of accidental spillage (these measures were included in the LWEP Final EIR).

The LWEP Final EIR concluded that in the unlikely event of a turbine tower collapse or blade throw, the potential risk to the public would be extremely limited, but still possible. Mitigation included the requirement to site all WTGs along public roadways to the public road setback of the combined WTG tower and blade height. Aspen will evaluate the applicability of this mitigation measure to the proposed project.

While there are no adopted thresholds for setbacks regarding EMF, Aspen will evaluate the potential to reduce EMF exposure. It is expected that through compliance with National Electric Safety Code standards and EMF design criteria by the California Public Utilities Commissions, and the incorporation of prudent avoidance measures, EMF exposure will be minimized.

Aspen will evaluate and determine the potential impacts on worker safety during construction and operation. It is expected that standard operating procedures and employee training relating to safety, potential emergency situations, and potential malfunctions would cover emergency evacuation, emergency response, safety, electrical equipment failures, fire prevention and control, mechanical malfunctions, notification procedures, maintenance activities and schedules.

Aspen does not expect that air traffic impacts will be an issue as the applicant has entered into an agreement with VAFB, which establishes policies for evacuation and termination of transmissions of Specified Turbines

during launch or pre-launch activities upon notice to do so by the VAFB. Mitigation requiring adherence to this agreement will be included.

All recommended mitigation measures will be based on information included in the LWEP Final EIR and Aspen's extensive experience with other wind energy projects and industry best practices.

Cumulative impacts to hazards and hazardous materials will be assessed based on related past, present, and foreseeable development. Hazards and hazardous materials impacts resulting from the identified alternatives will also be assessed. Appropriate mitigation for cumulative and alternative impacts will be developed, if necessary.

Hydrology/Water Quality

Background/Issues

By introducing new construction, grading, and the subsequent operation of a wind power generating field, transmission line, and associated infrastructure, the SWEP will have the potential to affect surface water drainage patterns, flooding, water quality, and water supplies. Major potential issues include:

- **Surface Water Drainage.** Project features will have the potential to interact with surface water drainage and hydrology to: increase peak discharges through the creation of new impervious areas and changing rainfall/runoff characteristics; channelize, divert, or relocate natural drainageways; and, place structures in the floodplain.
- **Surface Water Quality.** Grading, excavation and construction could result in erosion and sedimentation across the project site through disturbance of topsoil and drainage patterns, and creation of cleared areas for tower installation, access roads and other construction. Heavy equipment and machinery could accidentally release hazardous materials during construction, and there will be a potential for spills of material during the operation and maintenance of the wind turbines, substation and power line. The associated potential for surface water contamination is an area of concern for the community and the State, particularly in areas where waters are already contaminated. San Miguelito Creek, which is listed by the State of California as water-quality impaired, drains through the project site, and will receive runoff generated by the project. A portion of the site drains to Sloans Canyon Creek, also listed as impaired.
- **Groundwater and Water Supply.** Although the project is not located above a designated groundwater basin, a project setting and hydrology analysis submitted by the project applicant indicates that local groundwater exists on portions of the site. The same documents indicate there are springs on the property. Water for construction would be provided by a local supplier. A new well would be constructed near San Miguelito Creek.

The LWEP Final EIR determined that, with mitigation, impacts to surface water resources would be less than significant. A recent hydrologic assessment for the proposed project, but not including the proposed modifications to San Miguelito Road and the proposed transmission line, came to the same conclusion, and recommended six mitigation measures mainly concerned with construction and erosion protection.

Environmental Setting

Aspen will prepare descriptions of the regional and local surface water hydrologic, water quality, and water use setting relevant to the proposed project. The descriptions will include climate, watersheds, surface water drainages and runoff, floodplains, seasonal flow patterns, existing site conditions, previously-constructed features, downstream and upstream resources, impaired water bodies, and water supply. The LWEP Final EIR and the 2017 Strauss Wind Farm Hydrologic Analysis will be two of the sources reviewed in the gathering of background information. Other sources will include the Regional Water Quality Control

Board, the State Water Resources Control Board, Santa Barbara County, the Federal Emergency Management Agency, aerial photographs, topographic maps, online climate and runoff data, a site visit, and other available sources relevant to surface water.

Impacts and Mitigation Measures

Aspen will assess direct and indirect surface water and groundwater effects of the project and develop specific mitigation strategies where needed to avoid adverse impacts. Impact assessment will be based on the information collected in the baseline environmental setting, a description of the project (including features such as the transmission line and modifications to San Miguelito Road that were not covered in previous analysis), project construction and operation practices, and regulatory requirements and compliance. All CEQA Appendix G issues, as well as those outlined in the County of Santa Barbara Environmental Thresholds and Guidelines Manual, will be evaluated to determine how project features and activities could affect hydrology, drainage, flooding, water supply, and water quality. The impacts and conclusions of the LWEP Final EIR and the 2017 Strauss Wind Farm Hydrologic Analysis will be reviewed and modified as necessary to conform to the current project description and other new information. Aspen water resources specialists will coordinate with Aspen Team biologists, groundwater specialists, and hazardous materials specialists to ensure that all potential impacts are appropriately characterized. Major potential impacts will be described, with discussion of how, where and why the impacts exist, with a rationale for the determination of significance with and without mitigation. Aspen will develop and describe project-specific mitigation measures to avoid adverse impacts.

There are a variety of Federal, state and local regulations that govern activities that may affect surface water drainage, flooding, water quality, and water supply. Aspen will describe the regulatory setting in the context of the project description. Each regulation will be described by responsible agency, regulation intent, general compliance procedures, and relevance to the proposed project. Impacts will be assessed under the assumption that the applicable regulations are in effect and will be complied with.

Based on our review of the project description and the previous impact analyses, it is likely impacts will be less than significant with mitigation measures similar to those previously proposed.

Land Use and Planning

Background/Issues

The land use and planning analysis will discuss the SWEP's compatibility with existing and designated land uses within the surrounding area. The degree to which the project would have a significant land use effect would be based on the thresholds listed in Appendix G of the State CEQA Guidelines, as well as the County's "Quality of Life" thresholds listed in the County's Environmental Thresholds and Guidelines Manual. Land use thresholds applicable to the project include the following:

- Physically divide an established community.
- Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect
- Affect a community's quality of life through: (1) loss of privacy; (2) neighborhood incompatibility; (3) nuisance noise levels; (4) increased traffic in quiet neighborhoods; or (5) loss of sunlight/solar access.

The SWEP site is not within a habitat conservation plan or natural community conservation plan. As such, land use thresholds addressing potential conflicts with habitat conservation plans or community conservation plans would not be applicable to this analysis.

Environmental Setting

The project site is located in unincorporated Santa Barbara County near the City of Lompoc. The site is bounded by Vandenberg Air Force Base on the south and west sides, and private property on the north and east sides. The nearest private residence on non-project properties would be located approximately 875 feet from the project area boundary and approximately 1,950 feet from the closest wind turbine generator. The project site is accessed via San Miguelito Road.

The proposed project includes construction, operation, and decommissioning of an 8.6-mile, 115-kV transmission line that would interconnect with the PG&E transmission grid. The majority of the transmission line route would be located within an industrial area that contains the existing Celite mine. Proposed project activities also include grading and road improvements within the Coastal Zone. No wind turbine generators would be located within the Coastal Zone.

Impacts and Mitigation Measures

The types of land use and planning impacts resulting from construction, operation, and decommissioning of the SWEP would be similar to those described in Section 3.10 of the LWEP Final EIR. However, this analysis will consider whether the larger size of the proposed wind turbine generators, as well as their location within the project site, would require mitigation to reduce adverse effects to a less-than-significant level. The land use and planning analysis will also evaluate impacts to quality of life through a discussion of:

- Project compliance with visual development standards,
- Project effects on neighborhood traffic,
- Anticipated increase in noise level within adjacent communities, and
- Project compatibility with Vandenberg Air Force Base and adjacent residences.

Possible mitigation to minimize adverse land use impacts would include: (1) ensuring continued property access during all phases of construction, and (2) providing a project hotline that residents can call with questions or issues regarding project construction.

Mineral Resources

Based on a review of the Final EIR for Lompoc Wind, along with the technical studies and project description information provided by the applicant, it is likely that the impacts to mineral resources will be less than significant. The County of Santa Barbara Environmental Thresholds (as amended July 2015) contains no specific criteria for impacts to mineral resources. Therefore, impacts to mineral resources would result if the project significantly affected a known or locally important mineral resource. As part of the preparation of the project, research will be conducted to confirm that no new mineral resources within the project area have been identified since 2008. The full explanation for this conclusion will be presented in the Effects Found Not to be Significant section of the EIR Supplement.

Noise

Background/Issues

The Final EIR for LWEP found that the project would result in significant noise impacts that could be mitigated and identified nine measures that could be implemented to avoid the noise impacts. The SWEP applicant's Environmental Noise Analysis (February 28, 2018) makes the determination that the project would "meet the noise requirements of Santa Barbara County and CEQA" without identifying any mitigation. Whether any or all of the previous mitigation measures need to be carried forward will be a focus of our noise analysis. Our noise specialist, Mr. Birdsall, provided expert opinion to County staff and peer-review for

the LWEP CEQA process, and during that time, he conducted a site visit and attended the County Board of Supervisor hearings on certification of the previous EIR.

Environmental Setting

The SWEP applicant's Environmental Noise Analysis (February 28, 2018) includes data on the existing ambient noise levels monitored at three locations near the northern edge the site. These site-specific measurements are combined with wind speed data. The analysis provides useful information that will be peer-reviewed.

Previous information on the setting was filed prior to certification of the 2008 EIR after the release of the 2008 EIR for LWEP. We will compare the current data on baseline conditions with those reported in 2008 in the former applicant's Environmental Baseline Sound Survey (TetraTech EC, Inc.; December 14, 2008) that was submitted after release of the 2008 EIR. The relationships between hub-height wind speeds and ground level noise will be peer reviewed.

Impacts and Mitigation Measures

The assessment of environmental noise impacts in the EIR Supplement will reflect changes in the project. Compared with the original LWEP, which proposed 65 1.5-MW turbines, the SWEP reduces the total number of proposed turbines to 30. This reduces the number of noise sources to be built at the site.

For this EIR Supplement, the previously-identified potentially significant impacts of the LWEP will need to be compared with the impacts of the SWEP. The EIR Supplement will assess the need for and the feasibility of each of the previous mitigation measures.

Compared with the SWEP applicant's Environmental Noise Analysis (February 28, 2018), the previous EIR drew relatively conservative conclusions due to the absence of actual noise measurements for the setting. Aspen will take a fresh look at the thresholds of significance for use in the EIR Supplement and revisit the need for mitigation. Our approach will consider the County's recent work on noise impact analysis and mitigation as found in the ERG and Aera EIRs. Where appropriate, methodology and mitigation approaches from those documents may be followed where necessary to ensure consistency across the County's efforts.

Paleontological Resources

Ground-disturbing activities associated with construction of the proposed project have the potential to damage or destroy paleontological resources that may exist at the project site. Impacts sometimes occur due to unauthorized collection of fossils by workers or the public. Mitigation measures recommended in the LWEP Final EIR were adopted to reduce impacts to paleontological resources.

Impacts on paleontological resources described in the LWEP Final EIR will be re-evaluated to determine whether they accurately characterize impacts based on the revised layout and configuration of the SWEP. This analysis will include all areas of on-site disturbance as well as off-site areas, including disturbances areas associated with the 115-kV power line and the portion of San Miguelito Road to be widened. Impact discussions and significance conclusions will be revised as needed to make them complete and accurate for the SWEP. Mitigation measures adopted for the LWEP will be considered in the analysis and new or revised mitigation measures will be presented in the EIR Supplement as needed to reduce significant impacts to the degree feasible.

Population and Housing

Based on a review of the Final EIR for LWEP, along with the technical studies and the project description information provided by the applicant, it is likely that impacts to population and housing would be less than significant. The County of Santa Barbara Environmental Thresholds (as amended July 2015) contains no

specific criteria for impacts on population and housing. Therefore, impacts related to population and housing would result if the project would induce substantial population growth or displace a substantial number of homes. The project would require a temporary construction workforce and would not result in the construction or removal of housing. It is anticipated that the project would not result in a significant impact, and a full explanation for this conclusion will presented in the Effects Found Not to be Significant section of the EIR Supplement.

Public Services

Based on a review of the Final EIR for LWEP, along with the technical studies and the project description information provided by the applicant, it is likely that impacts to public services will be less than significant. Impacts will be analyzed for public services such as schools, and parks, and would be significant if the project would require the construction of new facilities to maintain acceptable service rations, response times, or other performance objectives. Additionally, impacts to schools will be evaluated using the guidance outlined in the County of Santa Barbara Environmental Thresholds (as amended July 2015). The project would not induce new population growth which could increase the use of regional schools, parks, or other facilities; therefore, the project is unlikely to result in a significant impact on public services. A full explanation for this conclusion will be presented in the Effects Found Not to be Significant section of the EIR Supplement. Potential impacts on fire and police response would be analyzed in greater detail within the section on Fire Hazards and Emergency Services.

Recreation

It is not anticipated that the SWEP would create a significant impact on recreation. Recreational uses in within the area include Miguelito County Park, as well as cycling, birding, and running along San Miguelito and Sudden Roads. Although the project would require substantial modifications to San Miguelito Road to permit transport of the wind turbine generator blades, these road improvements would not permanently damage or alter available recreational resources. The EIR Supplement will discuss potential adverse impacts to recreation from the widening of San Miguelito Road, although significant adverse impacts are not expected. Overall, the project is anticipated to result in similar impacts to recreation as described in the LWEP Final EIR. The full explanation for this conclusion will be presented in the Effects Found Not to be Significant section of the EIR Supplement.

Transportation/Traffic

Background/Issues

The proposed SWEP would result in traffic impacts during construction as the construction activities would generate traffic associated with workers' vehicles as well as trucks delivering materials to the project site. In addition, construction of the proposed transmission line could potentially disrupt traffic at locations where the alignment would cross or run adjacent to a public roadway. Similarly, the widening of San Miguelito Road may cause short-term disruptions to traffic during construction. Such issues as lane blockages, increased congestion, access to adjacent properties, safety, pedestrian routes, public transportation, and emergency vehicle access will be addressed. The operation of the proposed facilities would also generate traffic associated with workers' commute trips and maintenance vehicles. The traffic analysis will evaluate the potential impacts during construction and operation of the proposed project. An analysis of the project's impacts on aviation activities will also be addressed, primarily because of the proximity of VAFB (see also the Hazards and Hazardous Materials task description).

Environmental Setting

The roadways that would potentially be affected by the proposed project will be inventoried with regard to such physical conditions as number of lanes, types of traffic control devices, and sidewalk/shoulder locations. Traffic volume information will then be obtained from the Santa Barbara County, City of Lompoc, Caltrans, and the applicant's documents and technical studies. This data will be supplemented with new traffic counts where necessary. The traffic volume information will then be used to quantify the baseline traffic conditions (daily traffic volumes, peak hour traffic volumes, and/or intersection levels of service) on the affected roadways in the study area. The roadways that would be addressed include San Miguelito Road, Ocean Avenue, 12th Street, Industrial Way, Laurel Avenue, and State Highways 1 and 246. Existing traffic conditions and the traffic conditions for the anticipated years of construction and project completion will be evaluated.

Impacts and Mitigation Measures

The project's impacts during construction and operation will be evaluated by estimating the volumes of traffic that would be generated, adding this traffic to the baseline traffic volumes, then quantifying the traffic conditions for the without project and with project scenarios. The impacts will be evaluated in accordance with the criteria specified by Santa Barbara County guidelines for traffic impact analyses. Regarding the proposed transmission line and the widening of San Miguelito Road, such issues as lane blockages, access to adjacent properties, emergency vehicle access, and restricted pedestrian movements and bicycle lanes during construction will be addressed qualitatively. The analysis will also address potential impacts to transit service and damage to roadways as a result of construction activities. Long-term changes to the capacity of widened San Miguelito Road, which are expected to be beneficial, will also be addressed. The impacts to aviation activities will be evaluated based on the guidelines of the Federal Aviation Administration and the U.S. Air Force.

Mitigation measures will be identified to alleviate the project's impacts on traffic and roadway conditions. Such measures may include the preparation of traffic control plans, photo documentation of San Miguelito Road physical conditions, restrictions to travel/delivery times for trucks, and use of construction vehicle staging areas. Mitigation measures associated with aviation impacts will also be identified, such as lighting requirements on the WTGs and high-visibility markers on the transmission lines.

Utilities and Service Systems

Based on a review of the Final EIR for LWEP, along with the technical studies and the project description information provided by the applicant, it is likely that the impacts to utilities and service systems would be less than significant. Impacts to utilities and service systems could occur if the project would affect wastewater treatment requirements, new water or wastewater treatment facilities, storm water drainage, water supplies, wastewater treatment, landfills, or solid waste. For evaluating the adequacy of on-site wastewater treatment, Aspen will rely on information requested by County Environmental Health Services (EHS) to be submitted by the applicant. Similarly, the adequacy of the project's domestic water system will be based on information requested from the applicant by County EHS on pump yield tests and chemical analysis. The EIR Supplement will rely on determinations from County EHS regarding the adequacy of the project's proposed water and wastewater systems.

The County of Santa Barbra Environmental Thresholds (as amended July 2015) contain guidance and thresholds for analysis for impacts to surface and storm water quality, and solid waste. This guidance will be incorporated into the analysis. It is anticipated that the project would result in the same to similar impacts to utilities and service systems described in the LWEP Final EIR. A full explanation for this conclusion will be presented in the Effects Found Not to be Significant section of the EIR Supplement.

4.2.9 Cumulative Impacts

As required by State CEQA Guidelines Section 15130, cumulative impacts will be discussed for each of the issue areas analyzed in the EIR Supplement. Similarly, and to ensure consistency with State CEQA Guidelines Section 15130(a)(2), the EIR will briefly explain why, for those resources having less-than-significant impacts or no impacts, the combined and incremental cumulative effects of the project are not significant. The analysis of cumulative effects will consider a number of variables, such as geographic (spatial) limits, time (temporal) limits, and the characteristics of the resource being evaluated. For each identified cumulative impact, the EIR Supplement will explain whether the proposed project's contribution to the impact is cumulatively considerable. In coordination with the County, Aspen will develop a list of current and reasonably foreseeable future projects to be considered in the cumulative analysis. The analysis will also consider past projects that have resulted in impacts that could combine with similar impacts of the proposed project. If significant contributions to cumulative impacts are identified, Aspen will develop mitigation measures to reduce the project's contribution to the impact. This assessment will be generally qualitative in nature except where appropriate quantitative information is available about the impacts of other projects.

4.2.10 Alternatives

Alternatives will be designed to avoid or substantially reduce anticipated significant impacts associated with the proposed SWEP. Based on the previous LWEP Final EIR and Aspen's other experience with wind energy projects, the project is likely to result in significant impacts related to visual resources and biological resources, and may also have significant impacts related to air quality, cultural resources, fire hazards, geology, noise, paleontology, public safety, traffic, and/or water quality.

The appropriate alternatives vary based on project characteristics, site location, local resources, and sensitive receptors. Aspen will develop a reasonable range of reasonable alternatives to the project in consultation with County staff, and will consider the No Project Alternative, a reduced project alternative, and other alternatives as appropriate. A reduced project alternative is likely to have the potential reduce the project's significant impacts. Other possible alternatives include: an alternate site configuration with modified turbine/road locations, alternate substation location, and/or different power line routing. Some of these alternatives are conceptually similar to alternatives evaluated in the LWEP Final EIR. Ideas for alternatives that are either infeasible, inconsistent with project objectives, or would not reduce significant Project impacts will be eliminated with reasoning for their elimination provided in the EIR Supplement.

The alternatives discussion will include an analysis of environmental impacts of each alternative considered, along with a comparative analysis (matrix) to distinguish the relative effects of each alternative and its relationship to project objectives. The alternatives analysis will also identify the "environmentally superior alternative" as required by State CEQA Guidelines Sections 15126.6(d) and (e)(2).

4.2.11 Land Use/Policy Consistency

Aspen will analyze the project's consistency with plans and policies of the County's adopted Comprehensive Plan and Land Use and Development Code (LUDC), as we have done for other recent projects in the County. Aspen understands that this analysis will be used to support County Staff during preparation of its Staff Report for decision makers and would also serve to comply with CEQA Guidelines Section 15125(d). Per CEQA Guidelines Section 15382, an inconsistency with adopted land use policy is only considered significant if that inconsistency would cause an adverse and significant impact on one or more of the physical attributes associated with the area affected by the project.

Aspen has already collected all applicable Elements and related Supplements of the Comprehensive Plan and prepare a two-column table that lists all relevant policies and goals. This table will be used to assess

whether the project can be found consistent with each of these policies and goals. The assessment will be based upon the conclusions of the EIR Supplement's various technical analyses and impact conclusions. Key Elements and Supplements are anticipated to include the following:

- Open Space Element
- Agricultural Element
- Environmental Resource Management Element
- Conservation Element and related Oak Tree Supplement
- Circulation Element
- Energy Element
- Seismic Safety and Safety Element and Safety Element Supplement
- Land Use Element and related Air Quality Supplement

In addition to consistency with the Comprehensive Plan, an assessment of the project's consistency with the County's LUDC will be prepared. Aspen understands that all of the parcels associated with the project are zoned Agriculture (AG-II-100) and that they have Comprehensive Plan land use designations of either Agriculture-II (AG-II) or Agricultural Commercial (AC). In accordance with LUDC Table 2-1, LUDC Sections 35.21 and 35.52, and the Land Use Element, oil and gas extraction is an allowed use within the AG-II zoning district and AC land use designation with appropriate discretionary land use permitting. The project would also require approval of a Coastal Development Permit for road improvements within the Coastal Zone. This section will include a discussion of the project's consistency with the Local Coastal Program, which is enacted through the County's LUDC, as well as consistency with the County's Coastal Zoning Ordinance. No change in existing land use designation and/or zone district is proposed as part of the project.

4.2.12 Other CEQA Considerations and Effects Found Not to be Significant

In addition to the topics noted above, the EIR Supplement will address the other environmental topics required by CEQA and explain why no significant impacts would be associated with certain environmental issue areas. This section of the EIR Supplement will address the following.

- **Significant Environmental Effects Which Cannot Be Avoided if the Project Is Implemented.** This section will summarize the significant unavoidable impacts identified in the EIR Supplement analyses. If no significant unavoidable impacts are identified, then this section will state that conclusion and refer the reader to the impact significance conclusions in each issue section.
- **Significant Irreversible Changes Which Would Be Involved.** Section 15126.2(c) of the CEQA Guidelines requires a discussion of any significant irreversible changes caused by implementation of the project. This section will discuss the use of non-renewable resources and other irreversible changes caused by the project.
- **Growth-Inducing Impacts.** Under CEQA, a project may be growth inducing if it directly or indirectly fosters economic or population growth or the construction of additional housing, removes obstacles to population growth, extends community infrastructure, or otherwise facilitates activities that cause growth and potentially lead to significant environmental effects.
- **Effects Found Not to be Significant.** This discussion summarizes the effects identified as not being significant. Effects that are not significant do not require detailed evaluation under CEQA. As identified in the RFP and discussed in Section 4.2 above , the topics anticipated to be included in this summary discussion include:

- Energy
- Mineral Resources
- Population and Housing
- Public Services
- Recreation
- Utilities and Service Systems.

4.3 Task 3 – Draft EIR Supplement and Appendices

Aspen will obtain all comments on the Administrative Draft EIR Supplement from the County's Project Manager, who will compile one set of unified comments for use in revising the document. Aspen will complete revisions to the Administrative Draft EIR in conformance with the County's comments and the agreed-upon scope of services and schedule. As illustrated in Table 5 and Figure 2 in Section 5, Aspen will provide the Draft EIR Supplement within 30 calendar days of receiving the County's final comments on the Administrative Draft EIR Supplement.

Aspen will provide 1 reproducible unbound copy, 25 bound copies, 25 electronic copies on CD or DVD, and 1 electronic copy of the Draft EIR Supplement on CD/DVD with the document divided into chapters and technical appendices and in a searchable pdf format.

Aspen assumes that Energy & Minerals Division staff will be responsible for all distribution and noticing of the Draft EIR Supplement, including filings with the State Clearinghouse and County Clerk's office, and posting on Planning and Development's website.

4.4 Task 4 – Written Summary of Public Hearing Comments

Aspen understands that one Public Comment Hearing on the Draft EIR Supplement will be conducted during the public review period. The Aspen Project Manager will attend this hearing. Aspen assumes that a brief summary presentation of project-related issues, impacts, and public and agency comments will be prepared for the hearing, contingent upon further coordination with the Energy & Minerals Division Project Manager.

Aspen will prepare a summary of the comments received on the Draft EIR Supplement during the Public Comment Hearing seven calendar days after the hearing (see Table 5 and Figure 2 in Section 5). The summary will describe the Public Comment Hearing's date, time, location and duration, as well as summarize the comments that were expressed. Per the County's RFP, Aspen will submit one reproducible unbound copy and one electronic copy of the summary comments either on CD/DVD (or emailed to the Energy & Minerals Division).

4.5 Task 5 – Responses to Comments on Draft EIR Supplement

Aspen will prepare and submit written responses to comments received on the Draft EIR Supplement 30 calendar days after the close of the public comment period. This will include comments received at the Public Comment Hearing as well as comments otherwise provided to the County during the public review period. Aspen will work closely with the Energy & Minerals Division Project Manager to ensure that all comments received are properly identified and logged as to type of commenter (e.g., agencies, special interest groups, and individuals) in order that they can be easily tracked, retrieved, and referenced. Aspen will organize all the comment letters received and review them to identify each specific comment contained within each letter. Individual comments will then be categorized according to their resource or issue focus, and the appropriate technical analyst will be provided with the comments that require his or her technical expertise for response. Once the draft responses to comments are complete, Aspen team members will submit their

responses to the Aspen Project Manager, who will coordinate the compilation of responses and ensure that the responses are consistent and adequately address the comments in a clear, concise, and unbiased manner.

Responses that are within our proposal's scope and budget consist of explanations, elaborations, or clarifications of the data contained in the Draft EIR Supplement. If responses to comments result in the need for new analyses, the assessment of additional issues or alternatives, or the evaluation of substantial changes to either the project or the geographic area of study, an associated budget amendment and/or schedule revision will likely be requested. Responses to no more than 350 individual comments are assumed, including Public Hearing comments.

Consistent with the RFP, Aspen will submit one reproducible unbound copy and three bound copies of the responses and one electronic copy on CD or DVD (or emailed to Energy & Minerals Division staff).

4.6 Task 6 – Administrative Final EIR Supplement

Aspen will prepare and submit an Administrative Final EIR within 20 calendar days of receipt of the County's final comments on the written responses to comments received on the Draft EIR Supplement. Following receipt of the County's comments, Aspen will revise the text of the Draft EIR Supplement as needed, according to public and agency comments. All text revisions will be shown in "strike-out and underline" so that all text changes between the Draft and Final EIR Supplement are readily discernable. The Administrative Final EIR Supplement will contain a Mitigation Monitoring and Reporting Program for the project that includes each proposed mitigation measure, the timing of its implementation, and the parties responsible for its implementation and reporting.

Aspen will submit one reproducible unbound copy, three bound copies, and three electronic copies of the Administrative Final EIR Supplement on CD or DVD with the files divided into chapters. As noted under Task 6 (Written Responses to Comments), should preparation of the Administrative Final EIR Supplement require substantial new analyses, such as the evaluation of additional alternatives, a greater geographic study area, or new resource-specific/issue areas, a contract and scope amendment and/or schedule revision may be requested.

4.7 Task 7 – Proposed Final EIR Supplement

Aspen will prepare and submit the Proposed Final EIR Supplement within 15 calendar days of receipt of all final County comments on the Administrative Final EIR Supplement. Aspen will provide one reproducible unbound copy, 20 bound copies, and 20 electronic copies on CD/DVD and two electronic copies of the Proposed Final EIR Supplement on CD/DVD with files divided into chapters.

Aspen assumes that Energy & Minerals Division staff will be responsible for all document distribution and noticing, including posting on Planning and Development's website. Aspen additionally assumes that Energy & Minerals Division staff will be responsible for preparation of the document's Findings of Fact and Statement of Overriding Considerations (if necessary). We routinely prepare these types of decision-making documents for our clients, and fully understand their legal and technical requirements; we would be happy to complete them for you with approval of a commensurate scope and budget modification.

Aspen assumes that two public hearings for the County Planning Commission/Board of Supervisors on the project will be conducted. The Aspen Project Manager will attend these hearings, as well as up to three technical specialists if requested by the County. Aspen assumes that a brief summary presentation of project-related issues, impacts and public and agency comments will be prepared for the hearings, contingent upon further coordination with the Energy & Minerals Division Project Manager. The unit costs

for the Aspen Project Manager and technical experts to attend additional hearings are provided in the accompanying Cost Proposal.

4.8 Task 8 – Final EIR Supplement

Should decision makers recommend revisions to the Proposed Final EIR Supplement, Aspen will prepare a Final EIR Supplement to reflect those suggestions. Should these recommendations involve new analysis, re-analysis, or new or expanded alternatives, a commensurate cost amendment may be requested. All modifications to the text of the Proposed Final EIR Supplement will be shown in "strikeout and underline" so that all revisions are readily seen and clearly understood. Per the County's RFP, one unbound reproducible copy, five bound copies, one electronic copy on CD or DVD, and two electronic copies of the Final EIR Supplement on CD with the document divided into chapters will be submitted to the Energy & Minerals Division Project Manager. Aspen will submit the Final EIR Supplement within 15 calendar days after the final decision-maker action.

As noted above, we assume that Energy & Minerals Division will be responsible for all document distribution and noticing, including posting on Planning and Development's website.

5. Cost Proposal

Aspen's cost proposal to the prepare the EIR Supplement for the proposed Strauss Wind Energy Project is provided under separate cover in accordance with the instructions on page 18 of the RFP.

6. Schedule

Aspen has prepared a schedule consistent with the Deliverables and Proposed Project Schedule presented in the RFP. Table 5 provides project tasks with the deliverables and timeframes provided for each task. Figure 2 provides our estimated schedule for completion and finalization of the EIR Supplement in a graphic format. As noted in the RFP, it is understood that the County will prepare the Notice of Preparation and organize and conduct the initial public scoping meeting; Aspen would attend and take notes. It is assumed the overall EIR Supplement process can be completed in less than one year based on the timeframes provided in the RFP, and assuming 2-week County review cycles for most deliverables.

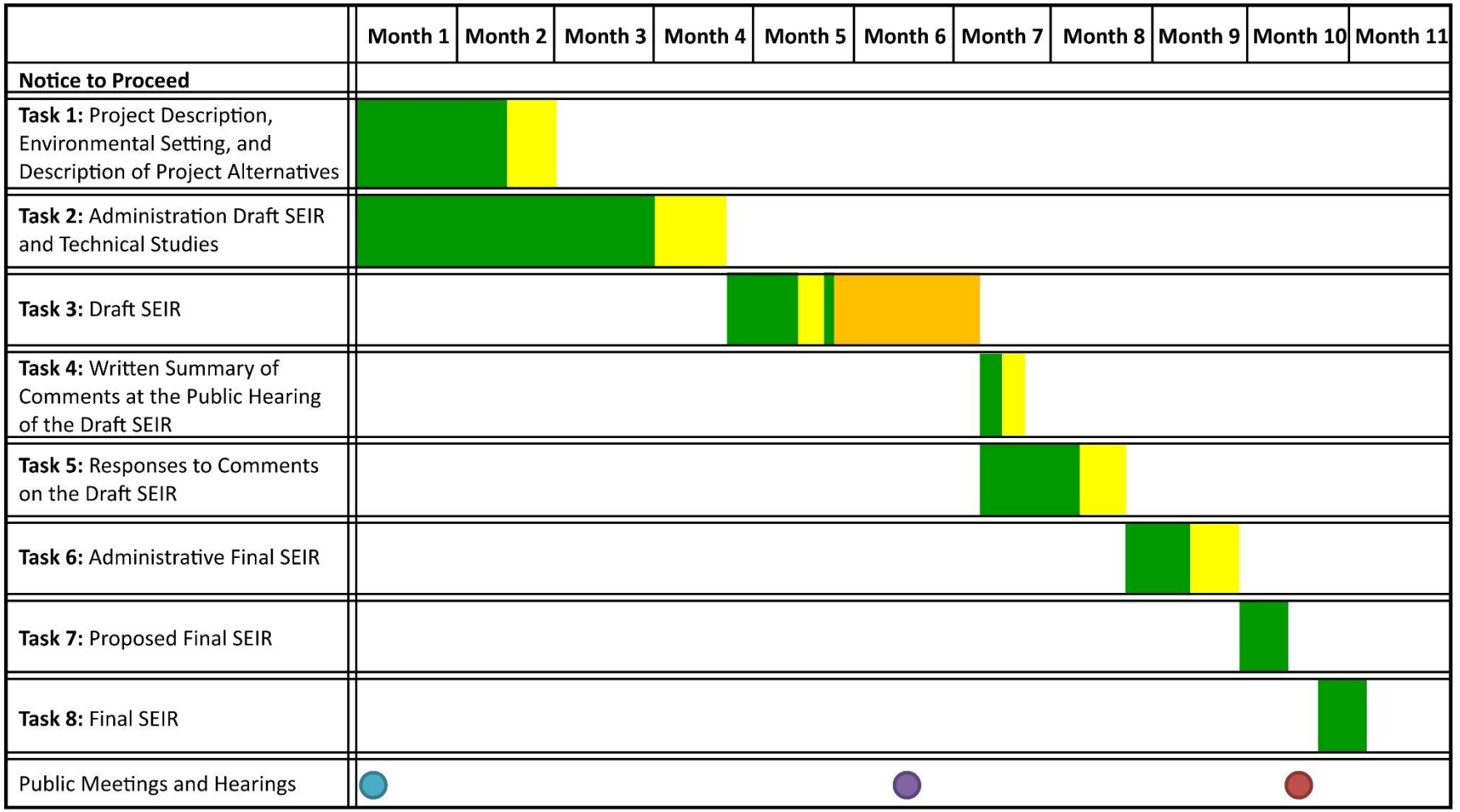
Aspen is fully committed to expediting this schedule and will work to ensure that all Team resources are available move forward as quickly as possible. Aspen often works on expedited schedules and we are fully capable of meeting or beating all project deadlines.

Table 5. Deliverables and Timeframes

Tasks	Deliverables	Timeframes
Task 1: Project Description, Environmental Setting, and Description of Project Alternatives	▪ 1 electronic copy on CD or email ▪ 2 colored hard copies	▪ 40 calendar days after Notice to Proceed (NTP)
Task 2: Administrative Draft EIR Supplement and Technical Studies	▪ 1 reproducible unbound copy ▪ 3 bound copies ▪ 1 CD – files divided into chapters	▪ 92 calendar days after NTP
Task 3: Draft EIR Supplement	▪ 1 reproducible unbound copy ▪ 25 bound copies ▪ 25 electronic (CDs) ▪ 1 CD – files divided into chapters; searchable PDF format	▪ 23 calendar days after receipt of County's final comments on the Administrative Draft EIR Supplement
Task 4: Written Summary of Comments at the Public Hearing on the Draft EIR Supplement	▪ 1 reproducible unbound copy ▪ 1 electronic copy on CD or email	▪ 7 calendar days after the public comment hearing
Task 5: Response to Comments on Draft EIR Supplement	▪ 1 reproducible unbound copy ▪ 3 bound copies ▪ 1 electronic copy on CD or email	▪ 30 calendar days after the close of the public comment period of the Draft EIR Supplement
Task 6: Administrative Final EIR Supplement	▪ 1 reproducible unbound copy ▪ 3 bound copies ▪ 3 CDs – files divided into chapters	▪ 20 calendar days after receipt of County's final comments on the responses to comments on the Draft EIR Supplement
Task 7: Proposed Final EIR Supplement	▪ 1 reproducible unbound copy ▪ 20 bound copies ▪ 20 electronic (CDs) ▪ 2 CDs – files divided into chapters	▪ 15 calendar days after receipt of County's final comments on the Administrative Final EIR Supplement
Task 8: Final EIR Supplement	▪ 1 reproducible unbound copy ▪ 5 bound copies ▪ 1 electronic (CDs) ▪ 2 CDs – files divided into chapters	▪ 15 calendar days after final decision-maker action

Note: All documents will be compatible with Microsoft Word. All copies of the EIR Supplement will be double-sided, printed in color on recycled paper and comb-bound. Electronic submittals will be divided into chapters with file sizes the can be easily published on P&D's website.

Figure 2: EIR Supplement Schedule



Schedule Notes

- Scoping Hearing - Aspen Attends
- Public Comment Hearing
- Planning Commission Hearing
- Aspen Preparation
- P&D Review, Comment & Noticing/Distribution (Assumes 14 calendar days for most reviews)
- 45-day public review period for Draft SEIR

The Schedule assumes that meetings with P&D staff will be conducted at the request of staff.

7. References

Section 7.1 below provides contact information for references who can attest to Aspen's past performance and the quality of our work products and client service. Aspen has received excellent client feedback and we encourage the County to contact our references about our past performance.

See Section 7.2 for excerpts from various commendation letters that have been received by Aspen from our clients. Our work has also been repeatedly recognized through awards received from the Association of Environmental Professionals and American Planning Association (see Section 7.3).

7.1 Client References

San Luis Obispo County, Planning and Building Department

Steve McMasters, Senior Planner
Phone: (805) 781-5096
Ellen Carroll, Environmental Coordinator
Phone: (805) 781-5029

- California Valley Solar Ranch Project EIR & Monitoring
- Topaz Solar Farm Project EIR & Monitoring

County of Ventura Public Works Agency

Angela Bonfiglio Allen, Environmental Manager
Phone: (805) 477-7175
Elizabeth Martinez, Environmental Planner
Phone: (805) 658-4374

- Annual Environmental Consultant Services Contract (2018)
- Santa Clara River Levee (SCR-3) Improvements Downstream of Union Pacific Railroad Project
- Santa Clara River Levee (SCR-1) Improvements Upstream of Highway 101 Project
- Ventura River Levee (VR-1) Rehabilitation Project
- Sespe Creek Levee Improvements Project

Los Angeles Department of Water and Power

Charles Holloway, Manager
Phone: (213) 367-0285
Nadia Parker, Environmental Planning and Assessment
Phone: (213) 367-1745

- Environmental & Air Quality Services On-Call

City of Hermosa Beach

Kenneth Robertson, Community Development Director
Phone: (310) 318-0242

- Transpacific Fiber-Optic Cables Project EIR

7.2 Aspen's Client Commendations

Client satisfaction is one of Aspen's core values. The company seeks to build lasting relationships with clients through responsiveness, flexibility, working closely with clients, providing expert guidance, and tailoring environmental compliance approaches to each client's needs. Aspen does this by paying close attention to the technical, procedural, and legal requirements of clients and their projects. Aspen's goal is a positive outcome for its clients, and the establishment of a mutually beneficial long-term relationship.

Aspen considers praise from clients to be a great motivator, as well as a valued compliment. Below are some quotes from clients about Aspen's work.

Ryan Hostetter, LEEP AP **County of San Luis Obispo**	"I just wanted to send a quick note thanking everyone for your years of proactiveness on the Topaz project... It has been a fantastic experience working with all of you and learning from you all along the way. I once told Gary Hood that this project was almost perfect... well I have changed my mind, it is the perfect project and much of that is due to your team and all of your years of hard work. This project is truly a model for future large projects."
Ellen Carroll **Environmental Coordinator, County of San Luis Obispo**	"*Quality of Work:* The County continues to be extremely pleased with the high quality of the Aspen's work. The projects they have worked on are large and controversial. Work products, field work, monitoring reports and other items have all been well done and timely. It is clear that Aspen has an excellent quality control program." "*Rating of Work Completed:* Aspen performed exceptional work for San Luis Obispo County. In addition, Aspen staff is highly trained and exhibits excellent judgment in all situations such as, public hearings, staff meetings, meetings with clients and concerned public."
Elizabeth Martinez **Environmental Planner, Ventura County Watershed Protection District**	"The Aspen team has met and exceeded my performance expectations on this project [Sespe Creek Levee Improvements Project]. As the Aspen project manager, you [Lisa Blewitt] have been consistently professional, proactive, and effectual in coordinating document reviews and delivering quality work products. You have the ability to 'make my job easier' as I know that I can rely on your coordination skills, persistence, and dedication to quality. Also, with regard to cost control, I appreciate your ability to prepare realistic and tight cost proposals at the onset of the project, keeping me informed of budget issues if they arise, and providing suggested cost cutting measures when appropriate…Again, it is my pleasure to have the opportunity to express my appreciation for the quality work that Aspen Environmental Group has provided to the District over the last several years."
Paul Richins, Jr. **California Energy Commission**	"As co-lead agencies, the Energy Commission and the BLM, supported by US Fish and Wildlife Service and California Department of Fish and Wildlife, are thankful to the Aspen Team… and appreciative of its high quality work, responsiveness to a number of important tasks and challenging schedules, and the rigor of its analysis. Only through the diligent efforts of the Aspen Team was this major undertaking able to move forward."

Nadia Parker **Los Angeles Department of Water and Power**	"… the Aspen (and sub) team... have been INSTRUMENTAL in getting us through the construction process in compliance with our permits and without negatively impacting bird, tortoises, foxes… You have all been so responsive and accommodating to keep up with the crews and the sometimes every shifting schedules all while doing your jobs with the upmost integrity and attention to detail."
Kirsten Berg **Environmental Specialist, Port of Long Beach**	"Aspen has demonstrated a level of competency and consistency that is difficult to find, particularly for complicated and controversial Port projects. Aspen's dedication to meeting project schedules, and expediting them as needed, while maintaining a positive and productive rapport with Port staff is particularly noteworthy. Their commitment to maintaining open dialogues with Port staff and communicating potential challenges as soon as they are seen has been an important aspect to successful completion of projects. As a result, I would not hesitate to recommend Aspen to perform the various types of work that they have completed for the Port."
John McKenzie **County of San Luis Obispo, Planning & Building Department**	"I have appreciated and enjoyed working with … the Aspen team on this complicated (and ever-changing!) project … The team's knowledge, expertise, and professionalism … have made it as painless a process as it could possibly be for me and I think the County as a whole. Thank you!"
John Boccio **CEQA Project Manager, California Public Utilities Commission**	"I would not hesitate to recommend Aspen to other agencies requiring a knowledgeable and responsible environmental consultant, especially for large complex projects that require a consultant with intelligent, responsive and hard-working staff members. Aspen has demonstrated that they can handle a variety of challenging tasks and can be depended on to provide quality products and service."
Raphael A. Torres **Chief, Division of Engineering, Department of Water Resources**	"Words are not enough to thank the ASPEN ENVIRONMENTAL GROUP (AEG) team for their excellent service. With AEG's help, the environmental permitting process went smooth for so many difficult and challenging projects. We continue to be amazed at how quickly AEG responds. Additionally, the ease at which AEG staff interacts with the Department of Water Resources Division of Engineering is commendable…"
Ed Pert **Regional Manager, South Coast Region, California Department of Fish and Wildlife**	"With the start of the public comment period on the draft EIR I want to take the opportunity to thank you and your staff for your hard work and support of the Department... We view this document as important precedent for the Department, and your professional expertise and overall support was invaluable to the effort. Your staff and the various sub-consultants working on behalf of the Department are first-rate. I would appreciate it if you would please convey my sincere appreciation for the effort to date."

Mark Morse **Environmental Coordinator, City of Roseville**	"…Aspen staff did an outstanding job keeping the project team informed on key issues undergoing analysis during document preparation. Aspen staff was extremely dedicated to the project, working long hours and over weekends during critical document revision and production periods. I was very impressed with Aspen's overall professionalism and quality of work and would recommend Tom and his team for other similar work."
Lynette Elser **Bureau of Land Management, California Desert District**	"The staff at Aspen is professional and desires to exceed our expectations. They have consistently produced quality work. The project manager has frequently changed her schedule to attend last minute meetings to accommodate our applicant's needs. The staff responded well to changes in our directions, including redoing analysis for complex situations in very short timeframes. We would contract with Aspen again for NEPA projects."
Roger Johnson **Siting Office Manager, California Energy Commission**	"The responsive Aspen management team and the commitment of corporate resources to adequately and expeditiously serve the varied Commission's needs have been a highlight of their performance… This management team and its supporting staff have done an outstanding job with the daily management of this multi-year, multi-task statewide on-call contract…"
Pam Shields **Regional Project Manager, Western Area Power Administration, Desert Southwest Region**	"Based on your performance to date, it is clear that your firm emphasizes customer service, partnering, quality, timeliness, and efficiency. Your Project Management staff is exceptional at listening to our needs and developing complete, accurate, and cost-effective solutions. Most significant, however, is the contribution the Aspen Team has made to improve the customer service responsiveness, quality, deliverables, and standards of our environmental team. Our partnership with Aspen has enabled us to greatly enhance our service reliability and timeliness."
Cosmé Diaz **Division of Engineering, Department of Water Resources**	"Aspen Staff have been responsive, knowledgeable, personable, and cooperative. That combination, plus quality deliverables, has made working with them a pleasure. The contract was extended 2 years, partly to maintain continuity on ongoing projects, but largely because of our satisfaction with Aspen's performance."
Scott Folsom **Los Angeles Unified School District, Bond Oversight Committee**	"The Program EIR has been a valuable resource for the District as a procedure manual for environmental analysis and mitigation, as well as an informative reference for LAUSD staff, public agencies and community members. This comprehensive and easy to use document has been invaluable to the LAUSD New Construction Program and is well deserving of this award."

7.3 Aspen Awards and Recognition

Aspen has received numerous awards in recognition of its CEQA and NEPA work from the Association of Environmental Professionals (AEP), National Association of Environmental Professionals (NAEP), and American Planning Association (APA). Below is a list of the awards Aspen has received in recent years (refer to Appendix C).

- AEP 2017 Environmental Resource Document **Merit Award** for the County of San Bernardino REVEAL Initiative Report.
- APA 2017 (San Diego Section) **Award of Excellence** for the Imperial County Conservation and Open Space Element.
- AEP 2015 **Merit Award** for Environmental Analysis Document for the Analysis of Oil and Gas Well Stimulation Treatments in California EIR.
- AEP 2016 **Merit Award** for Environmental Analysis Document for the San Luis Obispo County Renewable Energy Streamlining Program (RESP)
- NAEP 2014 National Environmental **Excellence Award** for NEPA Excellence for the Burning Man 2012-2016 Special Recreation Permit EA.
- AEP 2013 **Outstanding Environmental Analysis Document for the Ocotillo Wind Energy Facility EIS/EIR**.
- AEP 2011 **Outstanding Environmental Analysis Document** for the Panoche Valley Solar Farm Project EIR.
- AEP 2008 **Merit Award** for Environmental Analysis Document for the Sunrise Powerlink Project EIR/EIS.
- APA 2006 **Environmental Award** for the Program EIR for the LAUSD New School Construction Program.
- AEP 2006 **Merit Award** for Environmental Analysis Document for the Otay River Watershed Management Plan.
- AEP 2004 **Outstanding Environmental Analysis Document** for the Jefferson-Martin 230-kV Transmission Line Project EIR.

Cost Proposal

Aspen Environmental Group has prepared this cost proposal consistent with the Request for Proposals (RFP) issued by the County of Santa Barbara for preparation of an Environmental Impact Report (EIR) Supplement for the Strauss Wind Energy Project (SWEP). As specified in the RFP, the cost proposal is presented separately from the remainder of Aspen's proposal and presents the costs associated with preparation of an EIR Supplement for the SWEP. The costs were developed by taking into account the background reports prepared for this project by the applicant and the information and analysis contained in the Lompoc Wind Energy Project Final EIR, which will be supplemented by the SWEP EIR Supplement.

Table 4 in Section 3 of Aspen's proposal provides the total hours per team member and their percentage of the total labor hours estimated for preparation of the EIR Supplement. Our estimated not-to-exceed cost for completion of our proposed scope of work is **$310,814**, or $357,436 with a 15 percent contingency included, as requested in the RFP. A summary of the proposed budget by task is attached to this cost proposal followed by a detailed cost breakdown of labor hours, labor costs, and expenses for each task for each member of the Aspen team.

Our estimated cost is based on the following assumptions:

- The budget assumes that our project manager will attend up to five meetings with County staff over the course of preparing the EIR Supplement. It is assumed that each meeting would be one hour in length. If meetings are needed with any of Aspen's issue area specialists, it is assumed that those meetings will be conducted via teleconference. The unit cost for our project manager to attend additional meetings, if desired by the County, is $684 per meeting and the unit meeting cost for Aspen's deputy project manager is $564 per meeting. Unit costs for attendance at meetings by additional team members can be provided upon request.
- If selected, Aspen will be expected to attend and participate in one public comment hearing on the Draft EIR Supplement in the Lompoc area, and two public hearings before the County Planning Commission and Board of Supervisors. Per page 16 of the RFP, attendance at the EIR scoping meeting is not included in our budget. The budget assumes that Aspen's project manager attend each of these public meetings and hearings. We have estimated that each hearing could be up to four hours in length. The unit cost for our project manager to attend additional meetings or hearings, if needed, is $894 per meeting/hearing.
- Our budget assumes that the applicant's revised technical studies (referenced in the RFP) will be adequate for use in preparing the necessary descriptions of existing environmental conditions and preparing the impact analysis for the EIR Supplement. Also, our proposed schedule is based on receiving revised technical studies and any other necessary information from the applicant at the start of the EIR process, and that the applicant can provide timely responses to any questions or data requests about the project or any of the technical studies. If resolution of outstanding data needs cannot be readily corrected and necessitates additional research, field investigation, or analysis by Aspen beyond what is outlined in our scope of work (see Section 4, Study Methodology, of our proposal), a commensurate cost modification may be requested to cover the additional costs associated with such work.
- Energy & Minerals Division staff will provide all applicable planning documents and ordinances if they are not readily available on the Planning and Development Department's website.

- The proposed budget is based on review and comment by Planning and Development staff and one unified set of review comments to respond to on the Administrative Draft EIR Supplement and Administrative Final EIR Supplement.
- The proposed budget assumes that responses will need to be prepared for no more than 350 individual comments (public and agency), including Public Hearing comments. Responses will be within our proposal's scope and budget consist of explanations, elaborations, or clarifications of the data contained in the Draft EIR Supplement. If responses to comments result in the need for new analyses, the assessment of additional issues or alternatives, or the evaluation of substantial changes to either the project or the geographic area of study, a commensurate budget amendment and/or schedule revision would likely be requested to cover the additional costs associated with such work.
- Because the work product is an EIR Supplement, the scope of work and budget assumes that only new or revised information from the previous EIR will be included in the EIR Supplement. For information that is unchanged, the reader will be referred to the Final EIR prepared for the Lompoc Wind Energy Project.
- Energy & Minerals Division staff will be responsible for distributing all CEQA notices and postings, and for distributing the Draft and Final EIR Supplements. It is also assumed that Energy & Minerals Division staff will prepare the CEQA Findings of Facts and, if necessary, Statement of Overriding Considerations.
- The budget assumes that the deliverables to be submitted to the Energy & Minerals Division are those outlined in Section 4 of our Technical Proposal, which reflects the specifications of the RFP. Our costs also assume that the EIR will not exceed a total of 500 pages (with appendices on a CD) for printing and publication costs.
- The approximate unit price for the preparation of additional visual simulations of the project, if needed, would be approximately $1,510 per simulation.
- Additional assumptions regarding the work methodology for technical sections of the EIR Supplement are presented in the Study Methodology section (Section 4) of Aspen's proposal.

Strauss Wind Energy Project EIR Supplement

Budget Summary

	Task 1 PD, Setting, & Alternatives	Task 2 Admin. Draft SEIR	Task 3 Draft SEIR	Task 4 PH Comment Summary	Task 5 Responses to Comments	Task 6 Admin. Final SEIR	Task 7 Proposed Final SEIR	Task 8 Final SEIR	Total
ASPEN ENVIRONMENTAL GROUP									
Aspen Labor	$10,527	$113,759	$31,499	$4,950	$22,889	$16,968	$10,696	$7,327	$218,615
Aspen ODCs	$221	$961	$2,654	$12	$99	$513	$2,357	$732	$7,549
Aspen Environmental Group Total	$10,748	$114,720	$34,153	$4,962	$22,988	$17,481	$13,053	$8,059	$226,164
SUBCONTRACTORS									
Michael Clayton & Associates		$44,782	$3,303		$3,002	$600			$51,688
Geotechnical Consultants, Inc.		$13,813	$1,642		$929	$173			$16,556
Garland Associates		$13,457	$1,966		$702	$281			$16,405
Subcontractor Total		$72,052	$6,910		$4,633	$1,054			$84,649
Total Budget Per Task	**$10,748**	**$186,772**	**$41,062**	**$4,962**	**$27,622**	**$18,535**	**$13,053**	**$8,059**	**$310,814**

Total Budget with 15% Contingency Added	$357,436

Strauss Wind Energy Project EIR Supplement

Budget

Prime Contractor: Aspen Environmental Group

Labor Costs

Category or Name	Role	Hourly Rate*	Task 1 PD, Setting, & Alternatives		Task 2 Admin. Draft SEIR		Task 3 Draft SEIR		Task 4 PH Comment Summary		Task 5 Responses to Comments		Task 6 Admin. Final SEIR		Task 7 Proposed Final SEIR		Task 8 Final SEIR		Total	
			Hours	Amount	Hours	Amount	Hours	Amount	Hours	Amount	Hours	Amount	Hours	Amount	Hours	Amount	Hours	Amount	Hours	Amount
Jon Davidson	Project Manager	$210.00	15	$3,150	37	$7,770	24	$5,040	5	$1,050	28	$5,880	22	$4,620	16	$3,360	10	$2,100	157	$32,970
Stanley Yeh	Deputy Project Manager	$170.00	24	$4,080	85	$14,450	60	$10,200	18	$3,060	36	$6,120	48	$8,160	27	$4,590	19	$3,230	317	$53,890
Vida Strong	Project Advisor	$195.00	1	$195	1	$195	1	$195			2	$390	1	$195					6	$1,170
Scott White	Biological Resources	$210.00			16	$3,360	4	$840			2	$420			1	$210			23	$4,830
Jennifer Lancaster	Biological Resources	$135.00			130	$17,550	8	$1,080			9	$1,215	2	$270	1	$135			150	$20,250
Associate Biologist	Biological Resources	$127.00			26	$3,302													26	$3,302
Will Walters	Air Quality, GHG	$212.00			60	$12,720	6	$1,272			3	$636	1	$212					70	$14,840
Brewster Birdsall	Noise, Air Quality	$220.00			58	$12,760	6	$1,320			3	$660	1	$220					68	$14,960
Phil Lowe	Hydrology/WQ	$175.00			30	$5,250	6	$1,050			4	$700	1	$175					41	$7,175
Michael Macko	Cultural Resources	$130.00			20	$2,600	6	$780			2	$260	1	$130					29	$3,770
Alison Jaqua	Cultural Resources	$75.00			14	$1,050													14	$1,050
Sarah Mace	Cultural Resources	$58.00			20	$1,160	4				2	$116	2						28	$1,276
Joe Stewart	Paleontological Res.	$135.00			20	$2,700	2	$270					2	$270					24	$3,240
Tatiana Inouye	Land Use, Recreation	$140.00			70	$9,800	32	$4,480			14	$1,960	2	$280					118	$16,520
Patrick Meddaugh	Pub. Services, Utilities	$96.00	5	$480	120	$11,520	20	$1,920	8	$768	10	$960	4	$384	4	$384	5	$480	176	$16,896
GIS Specialist II	Mapping/Analysis	$95.00	10	$950	40	$3,800	4	$380					4	$380	1	$95	1	$95	60	$5,700
Graphics Specialist	Graphics/Mapping	$125.00	12	$1,500	24	$3,000	10	$1,250			16	$2,000	4	$500	4	$500	4	$500	74	$9,250
Admin. Specialist	Accounting, Invoicing	$72.00	1	$72	1	$72	1	$72	1	$72	1	$72	1	$72	1	$72	1	$72	8	$576
Sr. Administrative III	Document Production	$125.00			4	$500	10	$1,250			12	$1,500	8	$1,000	10	$1,250	6	$750	50	$6,250
Sr. Administrative I	Clerical	$100.00	1	$100	2	$200	1	$100					1	$100	1	$100	1	$100	7	$700
TOTAL			**69**	**$10,527**	**778**	**$113,759**	**205**	**$31,499**	**32**	**$4,950**	**144**	**$22,889**	**105**	**$16,968**	**66**	**$10,696**	**47**	**$7,327**	**1446**	**$218,615**

* Including fringe benefits, overhead, and fee.

Non-Labor Costs

Direct Project Cost Item	Unit Cost									
Printing & CD reproduction	-			$2,190	$6	$65	$380	$2,120	$548	$5,309
Mileage - 2 Wheel Drive (per mile)	$0.54	$205	$840	$205			$68		$68	$1,386
Mileage - 4 Wheel Drive (per mile)	$0.75									
Travel	-									
Postage/Delivery	-			$62	$5	$27	$27	$62	$62	$245
Outside Services	-									
Document/Data Acquisition	-									
Miscellaneous	-		$50							$50
Subtotal ODC Cost		$205	$890	$2,457	$11	$92	$475	$2,182	$678	$6,990
Aspen Fee 8%		$16	$71	$197	$1	$7	$38	$175	$54	$559
Total ODC Cost		**$221**	**$961**	**$2,654**	**$12**	**$99**	**$513**	**$2,357**	**$732**	$7,549

Total Cost by Task	**$10,748**	**$114,720**	**$34,153**	**$4,962**	**$22,988**	**$17,481**	**$13,053**	**$8,059**	**$226,164**

Strauss Wind Energy Project EIR Supplement

Budget

Subcontractor: Michael Clayton & Associates

Labor Costs

Personnel	Role	Hourly Rate*	Task 1 PD, Setting, & Alternatives		Task 2 Admin. Draft SEIR		Task 3 Draft SEIR		Task 4 PH Comment Summary		Task 5 Responses to Comments		Task 6 Admin. Final SEIR		Task 7 Proposed Final SEIR		Task 8 Final SEIR		Total	
			Hours	Amount	Hours	Amount	Hours	Amount	Hours	Amount	Hours	Amount	Hours	Amount	Hours	Amount	Hours	Amount	Hours	Amount
Michael Clayton	Aesthetics, Visual	$139.00			285	$39,615	22	$3,058			20	$2,780	4	$556					331	$46,009
TOTAL					**285**	**$39,615**	**22**	**$3,058**			**20**	**$2,780**	**4**	**$556**					**331**	**$46,009**

* Including fringe benefits, overhead, and fee.

Non-Labor Costs

Direct Project Cost Item	Unit Cost									
Printing & CD reproduction	-									
Mileage - 2 Wheel Drive (per mile)	$0.65									
Mileage - 4 Wheel Drive (per mile)	$0.75									
Travel	-		$1,850							$1,850
Postage/Delivery	-									
Outside Services	-									
Document/Data Acquisition	-									
Miscellaneous	-									
Total ODC Cost			**$1,850**							**$1,850**
Subtotal Cost by Task			**$41,465**	**$3,058**		**$2,780**	**$556**			**$47,859**
Aspen Fee 8%			$3,317	$245		$222	$44			$3,829
Total Cost by Task			**$44,782**	**$3,303**		**$3,002**	**$600**			**$51,688**

Strauss Wind Energy Project EIR Supplement

Budget

Subcontractor: Geotechnical Consultants, Inc.

Labor Costs

Personnel	Role	Hourly Rate*	Task 1 PD, Setting, & Alternatives		Task 2 Admin. Draft SEIR		Task 3 Draft SEIR		Task 4 PH Comment Summary		Task 5 Responses to Comments		Task 6 Admin. Final SEIR		Task 7 Proposed Final SEIR		Task 8 Final SEIR		Total	
			Hours	Amount	Hours	Amount	Hours	Amount	Hours	Amount	Hours	Amount	Hours	Amount	Hours	Amount	Hours	Amount	Hours	Amount
James Thurber		$190.00			5	$950					2	$380							7	$1,330
Aurie Patterson		$160.00			64	$10,240	7	$1,120			3	$480	1	$160					75	$12,000
Staff Geologist		$100.00			16	$1,600	4	$400											20	$2,000
TOTAL					**85**	**$12,790**	11	**$1,520**			5	**$860**	1	**$160**					**102**	**$15,330**

* Including fringe benefits, overhead, and fee.

Non-Labor Costs

Direct Project Cost Item	Unit Cost									
Printing & CD reproduction	-									
Mileage - 2 Wheel Drive (per mile)	$0.56									
Mileage - 4 Wheel Drive (per mile)	$0.75									
Travel	-									
Postage/Delivery	-									
Outside Services	-									
Document/Data Acquisition	-									
Miscellaneous	-									
Total ODC Cost		-	-	-	-	-	-	-	-	-

Subtotal Cost by Task		**$12,790**	**$1,520**		**$860**	**$160**			**$15,330**
Aspen Fee 8%		$1,023	$122		$69	$13			$1,226
Total Cost by Task		**$13,813**	**$1,642**		**$929**	**$173**			**$16,556**

Strauss Wind Energy Project EIR Supplement

Budget

Subcontractor: Garland Associates

Labor Costs

Personnel	Role	Hourly Rate*	Task 1 PD, Setting, & Alternatives		Task 2 Admin. Draft SEIR		Task 3 Draft SEIR		Task 4 PH Comment Summary		Task 5 Responses to Comments		Task 6 Admin. Final SEIR		Task 7 Proposed Final SEIR		Task 8 Final SEIR		Total	
			Hours	Amount	Hours	Amount	Hours	Amount	Hours	Amount	Hours	Amount	Hours	Amount	Hours	Amount	Hours	Amount	Hours	Amount
Richard Garland	Traffic/Transportation	$130.00			72	$9,360	10	$1,300			5	$650	2	$260					89	$11,570
Engineering Technician	Traffic/Transportation	$65.00			40	$2,600	8	$520											48	$3,120
TOTAL					**112**	**$11,960**	**18**	**$1,820**			**5**	**$650**	**2**	**$260**					**137**	**$14,690**

* Including fringe benefits, overhead, and fee.

Non-Labor Costs

Direct Project Cost Item	Unit Cost									
Printing & CD reproduction	-									
Mileage - 2 Wheel Drive (per mile)	$0.56		$500.00							$500.00
Mileage - 4 Wheel Drive (per mile)	$0.75									
Travel	-									
Postage/Delivery	-									
Outside Services	-									
Document/Data Acquisition	-									
Miscellaneous	-									
Total ODC Cost			**$500.00**							**$500.00**

Subtotal Cost by Task		**$12,460**	**$1,820**		**$650**	**$260**			**$15,190**
Aspen Fee 8%		$997	$146		$52	$21			$1,215
Total Cost by Task		**$13,457**	**$1,966**		**$702**	**$281**			**$16,405**