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VOLUME I: TECHNICAL PROPOSAL
Proposal to Prepare the
**Cannabis Land Use Ordinance Project
Environmental Impact Report (EIR)**



Prepared for:
**County of Santa Barbara
Planning and Development
Long Range Planning Division**
123 East Anapamu Street
Santa Barbara, CA 93101

Prepared by:
**Amec Foster Wheeler
Environment & Infrastructure, Inc.**
104 West Anapamu Street, Suite 204A
Santa Barbara, CA 93101

April 19, 2017 (Revised April 26, 2017)

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April 19, 2017 (Revised April 26, 2017)

Jessica Metzger, Senior Planner
County of Santa Barbara
Planning and Development
Long Range Planning Division
123 East Anapamu Street
Santa Barbara, CA 93101

Subject: Revised Proposal to Prepare an Environmental Impact Report for the Cannabis Land Use Ordinance Project

Dear Ms. Metzger:

Amec Foster Wheeler Environment & Infrastructure, Inc. (Amec Foster Wheeler) is pleased to present our revised proposal to prepare the Environmental Impact Report (EIR) for the Cannabis Land Use Ordinance Project (Project) for the County of Santa Barbara (County). We are excited about this opportunity to assist the County with this important effort and have brought together an outstanding team of environmental professionals and technical experts who have unmatched qualifications for this Project. Our team is led by Ms. Rita Bright as Project Manager and Ms. Erika Leachman as Deputy Project Manager. Our team is currently preparing the *Countywide Cannabis Cultivation and Manufacturing Regulations and Licensing Program* EIR for Santa Cruz County. We are also very familiar with Santa Barbara County planning standards and have prepared several recent EIRs for similar projects for the County, including the *Cuyama Solar Array General Plan and Ordinance Amendments* Project EIR, the *Shell Guadalupe Dunes Gravel Remediation In-lieu Fee Project* EIR, and the *Winery Ordinance Amendment Program* EIR. As a result, our team has a thorough understanding of the planning and environmental issues surrounding the proposed Project.

Highlights of our team's capabilities, strengths, and approach include:

- A team with recent direct experience preparing CEQA documentation for commercial cannabis cultivation and manufacturing ordinances in California;
- A Project Principal with more than 30 years of land use and CEQA experience with all phases of environmental review, including preparation of more than 50 EIRs, including 19 Program EIRs on communitywide regulatory projects in southern California;
- A Project Manager with over 30 years of experience completing land use planning and permitting efforts and EIRs for complex regulatory programs, including cannabis and other agricultural product cultivation,

manufacturing, and distribution, as well as serving as a former Deputy Director and Environmental Hearing Officer for the County;

- A Deputy Project Manager with over a decade of CEQA environmental impact analysis and land use planning experience for land use and zoning ordinance updates, including preparing a draft EIR for commercial cannabis cultivation and manufacturing and drafting a medical marijuana ordinance addressing distribution in the County, as well as serving as a former Senior Planner for the County;
- A Project team with all required technical expertise, including substantial experience working together on complex cannabis cultivation, development, and regulatory projects and substantial experience in Santa Barbara County; and
- A firm committed to working as an extension of County staff to meet the Project's goals, scope, and schedule.

We hope that this proposal demonstrates our understanding of the County's needs and our ability to deliver high quality professional environmental services in an efficient and timely manner. We have structured our proposal to respond to the County's Request for Proposals (RFP) exactly as requested, including the design of our proposed team to match the Project issues and County needs, and a tailored approach and work schedule for the Project.

The contents of this proposal will remain effective for a period ninety (90) days from the submittal date. Should you have additional questions or need clarification on the attached scope of work, please feel free to contact Rita Bright at Amec Foster Wheeler's Santa Barbara office (805) 962-0992 or rita.bright@amecfw.com. I am authorized to represent the firm in discussions regarding this proposal. We look forward to working with you.

Respectfully Submitted,



Aaron P. Goldschmidt, *Vice President*
Environmental Planning Group
Amec Foster Wheeler
104 West Anapamu Street, Suite 204A
Santa Barbara, CA 93101

Proposal to Prepare the
Environmental Impact Report for the
Cannabis Land Use Ordinance Project
for the County of Santa Barbara

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I. INTRODUCTION

Amec Foster Wheeler Environment & Infrastructure, Inc. (Amec Foster Wheeler) is pleased to submit this proposal to prepare an Environmental Impact Report (EIR) consistent with the California Environmental Quality Act (CEQA) for the Cannabis Land Use Ordinance Project for the County of Santa Barbara (County). We have assembled an exceptional team with unmatched experience in environmental impact assessment of cannabis-related regulation. Our team is led by a Principal, Project Manager, and Deputy Project Manager with substantial experience preparing complex land use ordinances and environmental impact documents, including those addressing commercial cannabis cultivation, manufacturing, and

land use regulation programs. Our proposal offers the County a cohesive team with experience working together on high quality EIRs for complex regulatory programs. Our team is skilled with addressing key issues of concern to the County, such as agricultural land use, public services, health and safety, resource conservation, site hydrology and regional water quality, utilities demand, land use compatibility, aesthetic changes, and land use planning involving a wide range of cannabis-related operations.

Amec Foster Wheeler is well qualified to prepare the Project EIR through our extensive experience with program-level projects and ordinances. Our project management team has recent experience preparing the *Commercial Cannabis Cultivation and Manufacturing Regulations and Licensing Program* EIR for Santa Cruz County. We have assisted the County of Santa Cruz with community outreach and extensive work with multiple County departments to refine both cultivation and manufacturing ordinances. We also recently completed Santa Barbara County's *Winery Ordinance Update* EIR, a countywide ordinance that would govern both winery processing/manufacturing issues and vineyard cultivation on development on 373,000 acres countywide, as well as the *Downtown Community Plan* Program EIR for the City of Santa Monica. As former public agency planners for Santa Barbara County, our management team has prepared EIRs to address the impacts of rural or agricultural development projects countywide. In addition, our Deputy Project Manager worked on the *Medical Marijuana Ordinance* for the County and is familiar with regulatory issues and community concerns that arise for this type of Project.

Amec Foster Wheeler's Point of Contact for contractual matters is Aaron Goldschmidt, Vice President of Environmental Planning and Natural Resources Services, in the Santa Barbara office at 104 West Anapamu Street, 204A, Santa Barbara, CA 93101, or by phone at (805) 962-0992.

Amec Foster Wheeler Team Relevant Expertise

- ◆ A proven record of working closely with Santa Barbara County on complex regulatory projects with excellent client references.
- ◆ An integrated and multi-disciplinary CEQA team experienced with the complex issues involving a countywide cannabis cultivation and manufacturing program, including coastal zone evaluations.
- ◆ A Project Manager with over 30 years of experience with Santa Barbara County planning and CEQA environmental review documents involving highly complex regulatory programs, including cannabis ordinances.
- ◆ A Deputy Project Manager with over 10 years of experience with complex land use regulations, including cannabis regulations, and CEQA in Santa Barbara County.
- ◆ Proven track record of completing complex projects within schedule and budget, with excellent client references.

I.A PROJECT UNDERSTANDING

Amec Foster Wheeler understands that the County is currently preparing a Cannabis Land Use Ordinance to address commercial cannabis activities within the County, including but not limited to commercial cultivation of cannabis, manufacturing and processing of cannabis products, transportation and distribution, and business operations, such as advertising and signage. The Project would include land use regulations to control where commercial cannabis-related activities occur within the County, as well as operational regulations to address how commercial cannabis activities are undertaken. The Project may restrict cannabis-related activities in residential neighborhoods and proximate to sensitive uses, such as schools, parks, libraries, and other facilities that serve youth and sensitive populations. This Project would also involve a comprehensive licensing program for all cannabis-related activities. Licensees would be subject to site inspections and enforcement actions under the Project.

The Project has a unique regulatory setting and background as it involves commercial cannabis activities, which are considered federal criminal offenses under the Controlled Substances Act (CSA) adopted in 1970. The CSA made it unlawful to manufacture, distribute, dispense, or possess any controlled substance and reflects the federal government's view that marijuana is a controlled substance with "no currently accepted medical use." The views and laws of the state and the County have differed significantly from the federal government. For example, in 1996 the passage of Proposition 215 (also known as the Compassionate Use Act) allowed use of medical cannabis statewide without threat of criminal prosecution. Proposition 215



While Proposition 215, SB 420, and the Medical Marijuana Regulation and Safety Act (MMRSA) addressed use of medical cannabis, commercial cannabis, including medical and non-medical, is a current issue involving local action from the County to establish regulations and a licensing program, consistent with state law.

legalized possession and cultivation of cannabis for patients and their designated primary caregivers, for personal medical use as recommended or prescribed by a California-licensed physician. However, Proposition 215 did not address commercial cultivation or manufacturing of cannabis products, and expressly did not allow unlimited volumes and locations of cannabis cultivation. In 2004, SB 420 broadened Proposition 215 by further protecting patients and caregivers from state criminal prosecution for additional related activities (e.g., transporting medical cannabis) and allowed patients to form medical cultivation "collectives" or "cooperatives" to grow cannabis for medical use. SB 420 also established a voluntary state identification system administered by local public health departments.

In 2015, the California Legislature passed the Medical Marijuana Regulation and Safety Act (MMRSA or MCRSA), establishing permitting for marijuana cultivation at the state level (with local approval). The law went into effect on January 1, 2016; however, the state estimates that the program will require until January

2018 to set up the necessary agencies, information systems, and regulations to begin issuing state commercial cultivation licenses. In the interim, local governments may choose to adopt new ordinances to permit or license local businesses in preparation for state licensing. Under the MMRSA, facilities currently operating in accordance with state and local laws may continue to do so until their license applications are approved or denied.

For non-medical cannabis activity, Proposition 64, commonly known as the Adult Use of Marijuana Act (AUMA), was passed by California voters on November 8, 2016. Subject to specified restrictions, Proposition 64 legalizes cannabis under state law for use by adults 21 years or older, including cultivating cannabis for personal use. Proposition 64 also sets up a state licensing scheme for commercialization of non-medical marijuana and state licenses are to be issued by January 1, 2018. Proposition 64 imposes state taxes on sales and cultivation, provides for industry licensing and establishes standards for cannabis products. Proposition 64 allows local jurisdictions to regulate (including prohibit) and tax non-medical cannabis.



Current County regulations address medical cannabis cultivation only for personal use and limited commercial activity. Article X, *Medical Marijuana Regulations* of the County Code entirely prohibits cultivation and/or processing of cannabis with only two exceptions. First, cultivation may occur for personal medical use. That is, a qualified patient or person's primary caregiver can engage in indoor or outdoor medical cannabis cultivation for personal medical use only, where cultivation must occur on a single cultivation site that does not exceed 100 square feet, subject to restrictions. Additionally, medical cannabis cultivators that

already existed on January 19, 2016, if they are legal under California state law, are considered legal nonconforming uses and may continue to cultivate medical cannabis. Otherwise, no permit or any entitlement can be approved or issued for cannabis cultivation and no person may establish or conduct such activity in the unincorporated areas of the County. Additionally, the County zoning ordinances state that "medical marijuana dispensaries" are not allowed in any zone district in the unincorporated areas of the County.

On February 14, 2017, the Santa Barbara County Board of Supervisors created an ad hoc advisory committee and directed staff to work with the committee to develop a registry to establish a baseline for cannabis in the County. The Non-Personal Cannabis Cultivation and Related Operations Registry Program (Registry), as established by the Board of Supervisors by ordinance, opened in April 2017 and is intended to accomplish the following goals:

- Collect data regarding past, current, and planned cannabis cultivation or related operations in the unincorporated area of the County;

- Inform future County cannabis studies including, but not limited to, CEQA analysis and economic impact analysis;
- Help define important elements of the EIR Project Description and Project Alternatives; and
- Establish a pool of registrants that may receive priority review on an application for the cultivation of cannabis or related operations in the unincorporated area of the County, pending Project adoption.

Building from the registration data, the Project would set forth land use regulations and a licensing program for cannabis-related activities. The Project would allow certain cannabis activities associated with the MMRSA and the AUMA, starting on or before March 1, 2018. The Project would allow for the cultivation of cannabis, as well as other cannabis-related activities, with an appropriate license and subject to a range of regulations. Regulations may include defining cannabis activities as allowable uses under the County zoning code, setting minimum parcel sizes, restricting cannabis activities based on resources and sensitive uses, and geographic restrictions (e.g., setbacks, site design, etc.) of cannabis cultivation and related uses. The Project would also involve a licensing program to track and manage cannabis activities countywide. CEQA impact analysis would evaluate all components of the Project consistent with the state's CEQA Guidelines and the County's *Environmental Thresholds and Guidelines Manual*.

I.B PROJECT APPROACH

This section details Amec Foster Wheeler's proposed approach to management, preparation, and production of the EIR to ensure timely completion of tasks and delivery of high quality work products. Our technical approach would involve close coordination throughout the process with County staff to ensure preparation of a thorough, objective, and sustainable environmental document with appropriately detailed analyses and mitigation measures. This approach will be particularly important due to cannabis industry and community interest in this proposed Project, as well as state license program goals for 2018.

Our team is experienced in preparing EIRs that fully assess the impacts of regulatory projects involving agricultural and manufacturing development in Santa Barbara County. Our award-winning EIRs provide detailed information and thorough impact analysis to help guide decision-making for complex projects. We have a proven record of providing a high level of support and service to agency staff. Our core philosophy and business practice is to act as an extension of staff to achieve the objectives of each unique project.

Approach to Project Management

Amec Foster Wheeler's project management philosophy is that the best technical, cost, and schedule controls result from hands-on participation in the study effort. Amec Foster Wheeler practices strict management controls in the areas of task management, scheduling, cost control and tracking, quality assurance, and client communication. Our team employs Microsoft Project® and other schedule tools to ensure that complex tasks are completed on an expedited schedule. Our project managers are highly involved in the day-to-day project activities and review all analysis to see projects through from initial scoping and costing, to final document production, while assigning tasks to those best qualified to carry them out effectively and efficiently. Amec

Foster Wheeler project managers are required to complete a rigorous in-house training program to ensure consistency and excellence in scope, budget, and schedule management for a wide-range of projects. In addition to this training, our local management team continues to train and teach CEQA-based environmental planning, including the California Association of Environmental Professionals (AEP) and California Department of Forestry and Fire Protection (CalFire). This approach to project management ensures the accuracy and efficiency of our EIR preparation efforts, as well as their legal sustainability.

Approach to Consultation and Coordination with the County

Amec Foster Wheeler regularly manages preparation of EIRs on complex land use projects throughout southern and central California. We strive to establish close working relationships with agency staff from project kickoff to completion. To ensure close coordination with County staff, we would establish clear lines of communication, employ regular conference calls or Skype meetings, and provide email updates and progress reports. Our team is located two blocks from the County's offices to allow regular (i.e., weekly) and impromptu meetings. Through careful coordination with County staff, we would ensure that staff-level meetings are high production, with early identification of key issues or questions for consideration, data requests and agenda preparation, as well as follow up minutes focused on actions items, responsibility, timing, and required product.

Approach to Document Production

Our team is committed to the production of high quality environmental documents through our required QA/QC program. The fundamental objectives of Amec Foster Wheeler's QA/QC program are to assure not only that our work product fulfills the Project directive requirements for each task, but also that the client's specific and unique needs are both fully defined and met. These objectives have been accomplished by first making an across-the-board corporate commitment to the concept of quality control and assurance. Second, for each consulting contract entered into by Amec Foster Wheeler, a QA/QC responsibility is formally delegated to a qualified individual or individuals, depending on the Project scope.

Amec Foster Wheeler has included Ms. Julia Pujo, a highly experienced technical editor in the Project team experienced with review of EIR documents, who would thoroughly review all submittals for grammar, readability, and consistency with the Project-specific style guide (i.e., Chicago Manual of Style). Reports would also be reviewed for internal consistency and consistency with the Project Description. No submittals would be delivered without going through full technical editing review.

Amec Foster Wheeler has also included Ms. Janice Depew, a highly experienced word processor and web content publisher, to prepare an electronic version of the EIR for posting on the County website. Ms. Depew specializes in creating PDF files "optimized for web" to minimize file size (less than 3 MB) while retaining visual quality of the documents. All hard copy deliverables will be double-sided, printed in color on recycled paper, and spiral bound. Additionally, all electronic submittals will be compatible with Microsoft Word® 2007 and provided as chapters and file sizes that are web-friendly (less than 3MB) and viewable on County workstations (i.e., Microsoft Word ® or PDF) The EIR will be provided as one complete file on a CD, as well

as separate files broken into as many logical sections as is necessary to meet the size limitations. Our team will strive to limit the size of individual files to 1 MB and the Table of Content will be compatible with HTML for web posting.

Approach to EIR Preparation

Based on the RFP, we anticipate preparing a full scope EIR to adequately assess the potential impacts of the Project, along with analysis of other alternative regulatory scenarios. The key elements of the Project's baseline and impact assessment involve determination of how much and in what manner cultivation is currently occurring in the County, and how this scenario would change under the Project and its alternatives. Defining baseline is particularly challenging given the long illegal status of cannabis cultivation and manufacturing. Our team would use advanced GIS tools, available geodata from state and local agencies, desktop research, and, if available, strategic site visits to characterize



The EIR would assess the impacts of new regulations for cannabis related activities, including indoor and outdoor cultivation, along with three (3) alternatives. This approach will allow the County to directly compare and contrast the environmental tradeoffs between different regulatory scenarios.

and, to the extent feasible, quantify the potential cultivation areas and patterns countywide. This initial task is critical to ensure a reasonable projection of the location and range of cannabis cultivation and other related activities that could occur under the Project. Additionally, we understand that the County is undertaking a registration process to gather information about potential licensees under the Project. Assuming the results of the registration process are available at Project kickoff, our team would thoroughly analyze the Registry data that is collated and organized by County staff to summarize the registration data, then integrate key industry data and local information regarding the methods and technologies for cannabis-related activities, gathered from publications and interviews, to help specify the extent of impacts that may occur. Our team has recent experience with such surveys/databases and can offer assistance based on recent experience to garner the most useful data. Our team would also review recent Initial Studies, Mitigated Negative Declarations, EIRs, and technical resources and reports that may involve cannabis-related uses, including County staff reports; information from the County Sheriff's Department and Fire Department, California Department of Fish and Wildlife (CDFW), and CalFire; and reports prepared to support the State MMRSA and other cannabis-related laws and regulations. This detailed investigation will enable the development of a robust description of the existing setting and Project for countywide cannabis-related operations.

We also understand that a high level of community and agency interest in the Project exists. Concerns often arise about the effects of cannabis-related activities in communities (e.g., crime, access by minors, grading

and other development impacts to biological and cultural resources, employment, odors, etc.). Concerns are best addressed through early community and agency outreach and clear disclosure of the Project and its potential environmental impacts. Additionally, cannabis cultivation interests may arise from regulatory agencies, such as CDFW, the Regional Water Quality Control Board (RWQCB), and California Department of Food and Agriculture (CDFA) in response to potential effects of grading and vegetation clearing on habitats and water quality, as well as commercial agriculture operations. To actively address these issues, our approach would involve early outreach to stakeholders to inform the scope of the EIR, a clear discussion of the technical aspects of indoor and outdoor medical cannabis cultivation, and concise background description and comparison of the federal and state level regulatory environments based on early outreach to the community and agencies.

With a clear understanding of the physical environmental setting and Project components, our team would work closely with County staff to develop the Notice of Preparation (NOP) immediately after Project kickoff, including incorporation of the County-prepared Project Description. We would develop a range of feasible alternatives and perform thorough resource and cumulative analyses, including identification of feasible mitigations, and determination of environmental findings, resulting in a high quality and legally sustainable EIR. We would work closely with the County to ensure that the CEQA Project Description describes the essential details and context of the Project. Our approach would involve the development of a range of reasonable alternatives that could avoid or substantially lessen potentially significant adverse effects while still achieving the Project's basic objectives. Our team is highly experienced in preparing EIRs that effectively assess the impacts of land use changes where site-specific development information is not available, such as program-based projects (e.g., zoning text, code regulation, specific plan, and general plan amendments).

Our overall technical approach to prepare the EIR reflects the scope of services requested in the County's RFP. As described in Table 1, each task is completed with a deliverable to the County (See Section IV: *Study Methodology* for detailed descriptions of the environmental resource issue areas and services included in this proposal). While all tasks identified in the RFP have been included, we recommend the following lineup of the tasks to ensure efficiency and expeditious document review and preparation; however, we would adhere to any requests from County staff for timeline and task management.

Table 1. Tasks to Prepare the EIR for the Cannabis Land Use Ordinance Project

Project Kickoff, Meetings, and Management. Amec Foster Wheeler views the kickoff process as critical to successful project completion. Our Project Manager and Deputy Project Manager would attend the Project kickoff meeting to refine the EIR scope, focus resource analyses (e.g. hazards and risk, air quality/GHGs, transportation, biological resources, water resources, etc.), and identify additional key issues. Amec Foster Wheeler would prepare an initial list of questions/data requests, and potential issues of concern and a refined Project schedule for discussion at the kickoff meeting. We recommend that the kickoff process also include a one day field tour with staff to visit key areas of cannabis activity within the County. Additionally, the preliminary EIR document outline would be provided to the County for review within one week following Project kickoff meeting.

Deliverables: Amec Foster Wheeler would prepare an initial list of questions/data request, identify any early issues or concerns, and provide a written summary of the meeting and submit the EIR document outline to the County electronically within 7 days of the kickoff meeting.

Data Collection, Technical Review, and Baseline Conditions Analysis. Our team of technical experts would work with County staff to collect and organize available information and data to support the establishment of the environmental baseline and Project impact analysis. This documentation would include but not be limited to: GIS data, license registration data (if available), technical reports, remote sensing, data from field work, and industry information regarding the regulatory setting for cannabis cultivation, as well as methods and technologies employed in both indoor and outdoor cultivation in climatic conditions typical of Santa Barbara County. If a collated database of Registry data is available at Project kickoff, we would create a GIS-based map of known cultivation sites countywide, then work with County staff to describe the existing cannabis-related industry in the County. For resource-specific data, such as biological and cultural resources, our team would provide detailed desktop research and review of the setting, methodology, and available data to document in the GIS as part of the baseline. Our team would also thoroughly review County planning and technical environmental documents (e.g., County Comprehensive Plan, recent EIRs, etc.) to identify useful information and analysis for incorporation into this EIR and to maximize utility of existing data.

Deliverables: We would collate baseline documentation into a Project administrative record to support the EIR and prepare a GIS-based map and database of existing baseline conditions as the foundation for environmental review. All new digitized data for the cultivation sites would be delivered to the County as a .shp file. The administrative record would be maintained and delivered digitally. Our methodology would be documented in a brief technical memorandum. Our team would review existing information with data requests provided through technical letters or memos with comments and questions; we will also submit a proposed methodology to analyze conditions. All submittals would be electronic (Microsoft Word® and PDF).

Table 1. Tasks to Prepare the EIR for the Cannabis Land Use Ordinance Project

Prepare Notice of Preparation (NOP). We understand that the County will prepare the NOP and provide a NOP presentation at two public scoping meetings. The NOP will be particularly important to obtain formal comments on the scope of the EIR and project alternatives from area residents, property owners, community organizations, and concerned local, state, or federal agencies. Obtaining early feedback from key stakeholders will help focus analysis and minimize the potential for project delays and unforeseen issues arising late in the process. Amec Foster Wheeler would support the County by including all comment letters received during the NOP in an appendix to the EIR and by providing a matrix indicating where such comments have been incorporated and responded to in the Draft EIR. This will assure reviewers that their comments have been responded to and to ease their review of the Draft EIR. Additionally, we would attend two public scoping meetings and also prepare a written summary of all comments recorded at this scoping meeting in the response matrix.

Deliverables: Our team would be available to attend two public scoping meetings and would provide one electronic copy of the summary of comments received from the meetings to the County.

Prepare Draft EIR Project Description and Preliminary Recommended Alternatives. Amec Foster Wheeler believes that a complete project description is the foundation of an adequate EIR. We would use the County-prepared Project Description as the basis for EIR impact analysis and integrate the Project Description into the EIR. As needed, we would also integrate information to describe existing cannabis cultivation countywide and long-term operations of indoor and outdoor grow sites, as well as Project timing and applicability. Our team would evaluate the GIS map and database to determine areas of potential effect from the Project, and help to refine Project alternatives as determined by varying geographic and operational restrictions. We would then prepare initial summaries of up to three (3) alternatives, including the “No Project” alternative and two (2) other concept alternatives, based on CEQA requirements, the County’s policy framework, and review of the proposed Ordinance, NOP, and consultation with County staff.

Deliverables: Amec Foster Wheeler would provide one electronic copy of the draft Project Description, and general environmental setting based on the County-prepared Project Description, and a draft of the proposed concept alternatives (Microsoft Word® and PDF), as well as an updated GIS map reflecting the Project Description and three (3) alternative cultivation scenarios.

Table 1. Tasks to Prepare the EIR for the Cannabis Land Use Ordinance Project

Prepare Administrative Draft EIR and Technical Studies. The Administrative Draft EIR (ADEIR) would address direct, indirect, and cumulative impacts for all relevant issues, as well as standard CEQA sections, such as growth inducement, climate change, and consistency with adopted plans and policies. Impacts associated with alternatives would also be analyzed and compared with Project impacts. The EIR would build upon and incorporate data from peer reviewed technical studies, past County plans, and EIRs using the methodology described in Section IV: *Study Methodology*. Each EIR section would contain an environmental setting description, assessment of construction and operational impacts, any required mitigation measures, and a clear statement of cumulative and residual impacts. The ADEIR would respond to issues raised during the scoping phase and public comment period, and a matrix listing those comments and EIR subsections where comments are addressed would be included.

Deliverables: Amec Foster Wheeler would provide one (1) CD of electronic versions of the ADEIR and Appendices (Microsoft Word® and PDF), and four (4) bound hardcopies of the ADEIR (appendices provided on CDs enclosed within EIR) within 55 days following scoping meeting.

Prepare Draft EIR. Upon receipt of final County comments on the ADEIR, Amec Foster Wheeler would prepare a Draft EIR (DEIR) that thoroughly addresses County comments and questions on the ADEIR. We would employ up-front coordination during preparation of the ADEIR to minimize changes needed. We would provide an electronic screencheck copy to the County prior to publication. The screencheck review of the DEIR would ensure incorporation of all County comments and provide staff with an opportunity to verify that comments were adequately addressed. Our team would also attend the Public Hearing on the DEIR and provide a presentation for the CEQA/EIR process for the Project. We would also prepare a written summary of all comments recorded at this scoping meeting in the response matrix.

Deliverables: Amec Foster Wheeler would publish and submit three (3) hard copies of the screencheck DEIR for one round of review by the County. Within 71 day days of Project kickoff, we would publish and submit ten (10) bound copies, and twenty (20) CDs containing electronic versions (Microsoft Word® and PDF) of the DEIR, including a version with files divided into searchable chapters suitable for easy download from County's website. Additionally, our team would provide one electronic copy of the summary of comments received at the Public Hearing to the County within 5 working days following the hearing.

Table 1. Tasks to Prepare the EIR for the Cannabis Land Use Ordinance Project

Prepare Response to Comments and Administrative Final EIR. Amec Foster Wheeler would work with the County to prepare responses to written and oral comments received on the DEIR during a 45-day public review period. We would incorporate substantiating technical details, CEQA references, and court cases as needed to support proposed responses and, if appropriate, develop detailed master responses to clearly and concisely respond to any recurring comments. Consistent with County standards, the Administrative Final EIR (AFEIR) would include the DEIR in its entirety with changed pages in strikeout and underline markup to address changes and corrections, a detailed Responses to Comments, and a Draft Mitigation Monitoring and Reporting Program (MMRP). To assist in maintaining project schedule, our staff would attend a working meeting with County staff to review comments, proposed responses, and potential changes to DEIR text.

Deliverables: Amec Foster Wheeler would provide one (1) electronic copy (Microsoft Word® and PDF) of the draft Response to Comments. Within 155 days from Project kickoff, Amec Foster Wheeler would also provide three (3) bound copies and one (1) CD with electronic copies (Microsoft Word® and PDF) of the AFEIR and Appendices (Microsoft Word® and PDF).

Prepare Final EIR with MMRP and Post Hearing Items. Upon receipt of the County's final comments on the AFEIR, our team would incorporate any changes into the EIR necessary to reflect County comments and final direction for the environmental analysis. We would prepare the Final EIR (FEIR), and provide review of the County-prepared MMRP, for certification by the County. Following EIR certification, we would incorporate any final edits based on County comments, hearing proceedings, and decision-maker actions to produce the FEIR.

Deliverables: Within 161 days of Project kickoff, Amec Foster Wheeler would publish twenty (20) bound copies and twenty (20) CDs with electronic copies (Microsoft Word® and PDF) of the FEIR and Appendices, including a version with files divided into searchable chapters suitable for easy download from the County's website. Within 10 working days after final decision-maker action on the Project, our team would publish one (1) CD with electronic copies (Microsoft Word® and PDF) of the FEIR and Appendices, including a version with files divided into searchable chapters suitable for easy download from the County's website.

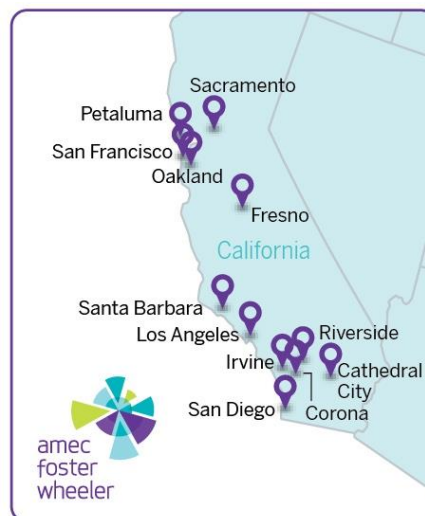
Meetings and Hearings. As a local team, Amec Foster Wheeler's Santa Barbara office is ideally situated in close proximity to County offices, allowing easy impromptu meeting attendance in both Santa Barbara and Santa Maria. The Amec Foster Wheeler would accompany County staff to meetings and public hearings for the Project. Our proposed budget assumes attendance at up to ten (10) meetings or hearings, including one (1) kickoff meeting/site visit, two (2) scoping hearings, three (3) staff-level meetings at the Planning and Development Department's Santa Barbara offices, one (1) public environmental hearing on the Draft EIR, and three (3) public meetings or hearings on the Project, which include adoption hearings before the Planning Commissions (County and Montecito) and the Board of Supervisors. Amec Foster Wheeler's Project Manager would attend the public hearings and provide a PowerPoint presentation within the existing scope if requested by County staff. Our Project Manager would attend additional meetings, as necessary, at an additional cost estimated at \$500 for a Santa Barbara meeting and \$700 for a Santa Maria meeting.

II. QUALIFICATIONS

II.A COMPANY PROFILE

Amec Foster Wheeler is part of Amec Foster Wheeler plc (Tax Identification No. 91-1641772), an international engineering services company with more than 44,000 employees in 40 countries worldwide. Amec Foster Wheeler operates more than 100 offices in North America comprising more than 4,000 scientists, geologists, engineers, biologists, environmental planners, and other specialists, including 500 professionals in California. Amec Foster Wheeler operates 12 California offices, including Santa Barbara, Fresno, and Riverside, which are well positioned to serve the County. Our management team is located two blocks from the County's Engineering Building in Santa Barbara to allow for impromptu meeting attendance and high levels of responsiveness and support to County staff.

Amec Foster Wheeler's Santa Barbara office is the headquarters of our company's Environmental Planning Group, which specializes in preparation of CEQA- and NEPA-compliant documents and planning/permitting support to local, state, and federal agencies. Work on this Project would be performed mainly by staff in our Santa Barbara office. In addition, our California offices maintain in-house expertise in environmental, land use, transportation and infrastructure planning, biological resource surveys, cultural resources investigations and outreach, endangered species assessment (e.g., California Tiger Salamander), wetland delineation, groundwater quality and basin characterization, visual resource assessment, socioeconomics, environmental justice and community impact assessment, hydrological resources analysis and engineering, hazardous materials studies, noise and air quality analyses, geological and geotechnical investigations, and assistance with state and federal permits (e.g., Fish and Game Code Section 1602 as well as Clean Water Act [CWA] Section 404 and 401 permits).



Amec Foster Wheeler California Locations

Amec Foster Wheeler is well qualified to prepare the Cannabis Land Use Ordinance Project EIR. Our project management team has unmatched experience with rural planning in Santa Barbara County. We have prepared three recent EIRs for the County, as well as several that address land use regulations in the County's rural and agricultural areas. Our team's Project Manager has managed preparation of complex agricultural development EIRs for the County, including the *Cuyama Solar Array General Plan and Ordinance Amendments* Project EIR, the *Winery Ordinance Amendment Program* EIR, and the *Shell Guadalupe Dunes Gravel Remediation In-Lieu Project Supplemental* EIR, and is extensively familiar with the County's agricultural and rural land policies and regulatory framework and related environmental and planning issues. In addition, our Deputy Project Manager has also assisted with recent County EIRs, and has managed

several other EIRs in the County (e.g., *South Ellwood Field* EIR). As a result, we are very familiar with the issues that arise from such projects and related public and agency concerns. Amec Foster Wheeler also has strong in-house expertise in oak woodland and native grassland habitats, cultural resources, hazards and risks associated with cannabis product manufacturing, agricultural resource management, cannabis cultivation and manufacturing technologies, and rural land planning issues.

Amec Foster Wheeler has consistently provided high-levels of service and responsiveness to County staff to prepare thorough, timely, and defensible analyses under strict timelines for delivery. Our team is noted for our ability to respond to complex issues raised in letters of comment, including those from land use attorneys and technical experts. Our team also has substantial experience with EIR preparation in Central Coast communities and with land use projects, as described in Section II.B, *Project Experience*. Amec Foster Wheeler's clients include the California State Lands Commission; Santa Barbara, Santa Cruz, Ventura, and San Diego counties; the cities of Los Angeles, Santa Barbara, Ventura, San Luis Obispo, Santa Monica, Fountain Valley, Sunnysvale, and San Diego; US Air Force; Port of Los Angeles, Port of Long Beach, UC Santa Barbara, UC San Diego, Los Angeles Air Force Base; and U.S. Department of Veteran Affairs (San Francisco, Los Angeles ACC, and Sepulveda OPC).

II.B RELATED PROJECT EXPERIENCE

Our team has substantial directly relevant experience and expertise with preparation of the proposed EIR. Our management team has substantial experience working on programmatic environmental investigations and translating such countywide findings into meaningful mitigations that can be successfully implemented at a project-level. We understand County staff expectations for EIR content and quality, and we are supported by a technical team of specialists with hands-on experience working on similar projects. Detailed below are selected examples of projects performed by our team.

"Amec Foster Wheeler has provided very high quality environmental services in responsive manner and I would not hesitate to recommend your firm for employment to other City agencies and jurisdictions."

Joe Salaices, Superintendent, Griffith Park, City of Los Angeles

COMMERCIAL CANNABIS CULTIVATION AND MANUFACTURING REGULATIONS AND LICENSING PROGRAM EIR

COUNTY OF SANTA CRUZ, CA

Amec Foster Wheeler is preparing a Program EIR for the Santa Cruz County Commercial Cannabis Cultivation and Manufacturing Regulations and Licensing Program. We have performed extensive public outreach with cannabis cultivators and manufacturers, holding multiple focus group meetings and touring more than a dozen indoor, outdoor, and greenhouse grow operations. Some operations observed include non-volatile manufacturing. We have met with cannabis product manufacturers to refine definitions for non-volatile and volatile extraction, including higher intensity processes to produce Butane Hash Oil (BHO), and less volatile CO₂ processing for end products such as oil extracts, hash, rosins, tinctures, and infusions. We have coordinated with multiple County departments, including Planning, Code Compliance, County Sheriff, County Fire Marshal, and the new Cannabis Licensing Office, along with interagency coordination involving the California Department of Fish and Wildlife, Regional Water Quality Control Board, and CalFire. We have also conferred with concerned neighbors and residents in small focus groups and through heavy public participation in the Notice of Preparation process. For technical work, we have completed GIS mapping to help define the location of existing grows, ordinance applicability, parcels excluded by development standards and acreage of allowable and projected cannabis canopy under different scenarios. Submittal of a detailed draft Project Description, existing environmental baseline, and the EIR approach to impact methodology has assisted the County in understanding the totality of the draft ordinances and led to targeted updates and refinements. The detailed approach to baseline and methodology has permitted the County to consider the legal implications of differing approaches to analysis. A key issue which has emerged during initial research is to what extent passage of the cultivation and manufacturing ordinances would spur a “green rush” and how much of such activity would occur within the “shadows” as illegal cultivation and manufacturing due to ordinance restrictions. We are also working with the County up front on possible ordinance modifications or mitigation measures to maximize participation in legal cultivation and manufacturing while also protecting neighborhoods and public health, safety, and welfare. We are assisting the County with implementation of an aggressive schedule to complete the Program EIR within 8 months and facilitate adoption of the program and regulations in advance of state licensing program requirements in January 2018. Our team increases schedule and budget efficiency by overlapping tasks to the extent feasible and coordinating multiple technical experts to ensure high quality deliverables on an expedited schedule. The Administrative Draft EIR is due in spring of 2017 and project completion is scheduled for late summer of 2017.

Client Name and Contact

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Santa Cruz, CA 95060
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(831) 454-5317

Project Team Key Personnel

- Dan Gira, Project Principal
- Rita Bright, Project Manager
- Erika Leachman, Deputy Manager



SANTA BARBARA COUNTY WINERY ORDINANCE AMENDMENT PROGRAM EIR COUNTY OF SANTA BARBARA, CA

Amec Foster Wheeler prepared the Program EIR for the County of Santa Barbara's Winery Ordinance Amendment Program Update for all new wineries and new or revised permit applications for existing wineries within an estimated 373,000 acres of agricultural zoned lands (AG-I and AG-II) within the Rural and Inner-Rural lands in the inland portion of unincorporated Santa Barbara County. The Project included new winery regulations including development criteria within a tiered-level permitting system of winery-related regulations, including permit review requirements based upon proposed winery uses (e.g., tasting rooms, tours, food service and preparation, winemaker meals, winery special events, etc.) and specific development standards for each permitting tier (e.g., acreage, planted vineyard, maximum structural size, visitor hours, etc.). Our team worked closely with County staff on development of the EIR to address key community concerns, including agricultural resources, Williamson Act-Uniform Rules consistency, land use compatibility or new wineries within rural neighborhoods, hydrology and water quality, biological resources, noise, traffic safety, air quality. The EIR was subject to extremely high levels of community interest from both vintners and residents of potentially affected rural neighborhoods.

Client Name and Contact
David Lackie County of Santa Barbara Planning and Development Department 123 East Anapamu Street Santa Barbara, CA 93101 (805) 568-2023
Project Team Key Personnel
■ Rita Bright, Project Manager ■ Julia Pujo, Deputy Project Manager


"The County has recently awarded consulting contracts to AMEC given the firm's excellent reputation in the environmental and planning fields...AMEC's performance on these complex and controversial projects has been extremely effective, timely, and efficient...AMEC's analyses meet the high quality expectations of the County and involved stakeholders."
Kevin Drude, Former Deputy Director, Santa Barbara County Planning & Development Department

SOCAL GAS COUNTYWIDE ADVANCED METERING ORDINANCE AMENDMENTS & PROGRAM EIR

COUNTY OF SANTA BARBARA, CA

Amec Foster Wheeler is assisting the County with development of a countywide ordinance to govern allowable development of smart meters within a 400,000-acre study area. Southern California Gas Company (SoCal Gas) plans to install up to 105 pole-mounted data collection units (DCUs) in public right-of-ways throughout inland areas of Santa Barbara County. Our team is scheduled to prepare the amendment package to the Telecommunications Ordinance in coordination with County staff to streamline the permitting process for the installation of the DCUs. We are facilitating the public outreach process on this Project; this Project contains high levels of public interest due to the appearance of the utility poles and public health concerns associated with telecommunications facilities. The draft ordinance would include detailed siting criteria to govern location of the DCUs as well as completion of community outreach and coordination. Our team will prepare the appropriate level of CEQA environmental analysis, which is currently under review. Major environmental resource areas of concern are anticipated to be visual resources, land use and neighborhood interest, and temporary construction impacts (e.g., noise).

Client Name and Contact

Mindy Fogg
 County of Santa Barbara
 Planning and Development Department
 123 East Anapamu Street
 Santa Barbara, CA 93101
 (805) 884-6848

Project Team Key Personnel

- Rita Bright, Project Manager
- Shawn Gaver, Deputy Project Manager



PLAN SANTA BARBARA GENERAL PLAN UPDATE PROGRAM EIR

CITY OF SANTA BARBARA, CA

This EIR evaluated the impacts of the update of the City's General Plan over a 12,000-acre planning area, including both urbanized and rural foothill regions. Amec Foster Wheeler worked collaboratively with City staff to transform general project goals for sustainable development into a Project Description of sufficient detail to support EIR analysis. The EIR was developed concurrently with the General Plan, with the EIR providing key elements of the final General Plan. The plan included policy goals for protection of open space and biological resources and a strong emphasis on green building and energy conservation. Key EIR issues included impacts to biological resources, loss of open space, mobility and traffic congestion, air quality, human health risks of diesel particulates, aesthetic impacts within established neighborhoods, GHG generation, and the adequacy of infrastructure and utilities. The EIR provided a full environmental justice evaluation regarding changes to neighborhoods as well as other potential socioeconomic effects on low-income communities that occur throughout Downtown Santa Barbara.

Client Name and Contact

Barbara Shelton, Senior Planner
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 Community Development Department
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Project Team Key Personnel

- Dan Gira, Project Manager
- Rita Bright, Deputy Project Manager

CUYAMA SOLAR ARRAY GENERAL PLAN AND ORDINANCE AMENDMENTS PROJECT EIR

COUNTY OF SANTA BARBARA, CA

Amec Foster Wheeler prepared the Final Certified EIR for a proposed 40-megawatt (MW) commercial solar photovoltaic (PV) system on 327 acres of agricultural land near the small rural town of Cuyama, in the northeastern corner of Santa Barbara County. The Project was approved by the Board of Supervisors and includes legislative amendments to the County Comprehensive Plan and Land Use Development Code to potentially permit utility-scale solar energy projects in agricultural zones within the Cuyama Valley Rural Region, a major agricultural production area in inland Santa Barbara County. Project development would entail a new, 3-mile 70-kilovolt (kV) generation tie-line to distribute the Project’s generated power to the Taft-Cuyama substation. Our team worked closely with County staff over a 2-year period to help refine the ordinance and its applicability to address concerns of rural residents, winery owners, and the Vintners Association, with the ordinance eventually being narrowed to apply a more selective subset of agricultural land in order to minimize conflicts with both agricultural operations and rural neighborhoods. Key issues included impacts to agricultural resources, land use, visual resources, and candidate scenic highways. Key issues addressed in the EIR included loss of prime agricultural soils, impacts to cultural biological resources, groundwater reliability, and visual and aesthetic impacts. Our team worked directly with the Department of Conservation to compile an acceptable mitigation package of loss of Williamson Act contract land.

Client Name and Contact

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Project Team Key Personnel

- Rita Bright, Project Manager
- Erika Leachman, QA/QC



DOWNTOWN COMMUNITY PLAN PROGRAM EIR

CITY OF SANTA MONICA, CALIFORNIA

Amec Foster Wheeler is preparing the Final Program EIR for the Santa Monica Downtown Community Plan for the City of Santa Monica to enable approximately three million additional square feet of development in the 240-acre downtown. One of the Plan’s four key elements includes public right-of-way and pedestrian improvements through the City’s capital improvements program, to install sidewalk enhancements along 4 miles of strategic corridors to better the pedestrian environment, access, safety, and connections to transit. Sidewalk improvements include safer intersection crossings, improved design, and installation of street trees, treatment of problem Indian laurel fig trees through root and crown pruning and installation of rot barriers and tree grates. The Program EIR provides project-level analysis of two major land use and circulation alternatives to maintain

Client Name and Contact

Rachel Kwok, Project Manager
 Strategic & Transportation Planning
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Project Team Key Personnel


- Dan Gira, Project Manager
- Nick Meisinger, Deputy Project Manager
- Erika Leachman, Former Deputy Project Manager/ Current Senior Technical QA/QC Manager

decision-maker flexibility along with assessment of additional alternatives. The EIR addresses the impacts of construction of two new urban roads and provides detailed assessment of construction-related effects over the project’s 20-year planning horizon. As with several other of our recently completed City of Santa Monica EIRs, our team provided particular attention to construction traffic management issues, neighborhood compatibility, noise and vibration impacts, air quality impacts to sensitive receptors, and impacts to subsurface water and sewer utilities within a highly urbanized area.

GOLETA BEACH MANAGED RETREAT PROJECT 2.0 EIR

COUNTY OF SANTA BARBARA, GOLETA, CA

Amec Foster Wheeler prepared the Certified Final EIR for this project, which has been approved by the County Board of Supervisors. Amec Foster Wheeler worked closely with County staff on this project, which garnered high levels of public interest. The project involves the removal of 1,200 feet of emergency rock revetment and the landward relocation/retreat of key park infrastructure and utilities to address Coastal Commission policy concerns and reduce potential for damage from wave attack and eventual sea level rise. The project involves close coordination with Coastal Commission staff. Key tasks include detailed analysis of shoreline and coastal process issues, including regional sand supply, longshore transport, wave run-up and their relationship to oscillations in climatic cycles. This analysis also informed a detailed assessment of project consistency with adopted plans and policies. Important environmental considerations include potential impacts to coastal access, coastal dependent and related recreation, aesthetics, special status wildlife (e.g., globose dune beetle), and water quality. Amec Foster Wheeler worked with County staff to craft alternatives to address adverse effects to coastal recreation due to coastal erosion and shoreline retreat, while addressing concerns over changes to natural coastal processes and key associated Local Coastal Plan and State Coastal Act policies. Amec Foster Wheeler has been retained by County Executive Office to assist with the Coastal Commission hearing process for this project.

Client Name & Contact	
Alex Tuttle, Planner County of Santa Barbara Planning & Development Department 123 E. Anapamu Street Santa Barbara, CA 93101 (805) 884-6844 atuttle@co.santa-barbara.ca.us	
Amec Foster Wheeler Key Personnel	
<ul style="list-style-type: none"> ■ Dan Gira, Project Manager ■ Erika Leachman, QA/QC Manager 	
	

“Amec Foster Wheeler’s familiarity with the complexities of general plan preparation and implementation were of great assistance to City staff in completion of this project.”

John Ledbetter, Principal Planner, City of Santa Barbara

III. STAFF

Amec Foster Wheeler has assembled a strong management team based on our experience preparing CEQA documents for the County. As set forth in the organizational chart below, our team includes the full complement of staff necessary to meet the County's needs to manage this project, address technical issues, and deliver a high-quality product in a timely manner. With managers and technical leads experienced in the project's key issues, our team provides an exceptional balance of Santa Barbara County experience, CEQA experience, and technical expertise to successfully address the unique challenges of this project. Our team will not change without approval from the County.

Amec Foster Wheeler's team consists of:

- **Dan Gira, Project Principal** – Mr. Gira will ensure the adequate resources are allocated to complete this Project and provide oversight to ensure consistency with CEQA requirements, County standards, and approach to analysis.
- **Rita Bright, Project Manager** – Ms. Bright will be the County's primary contact on all matters related to the Project and will manage this effort from kickoff to completion. She will provide oversight to ensure consistency with County standards and policies and the technical adequacy of all deliverables. She will be responsible for overall project management, team coordination, timely submission of high-quality deliverables, and budget and schedule management.
- **Erika Leachman, Deputy Project Manager** – Ms. Leachman will be responsible for coordinating technical analysts to assure accuracy of the analysis, internal team coordination, and oversight of technical team members, as well as adherence to Project timeline and budget. Ms. Leachman will handle the day-to-day activities associated with document assembly and production.
- **Julia Pujo, Quality Assurance/Quality Control Technical Manager** – Ms. Pujo will ensure all deliverables meet County document standards, format preferences, organization, analytical approach, and will provide final QA/QC for all submittals.
- **Technical Experts** – Our team includes in-house technical experts and project scientists with extensive experience with key issues of concern for the proposed Project, including hazardous materials and hazards, biological resources, hazardous materials and site contamination, water resources, transportation, energy and utilities, and land use planning and policy.

The Amec Foster Wheeler project team organization, relationship to the County, and communication structure is depicted below in the organizational chart. Summaries of team member qualifications and experience are provided below in Table 3 and division of labor is described in Table 4. Resumes for all team members are provided on the enclosed flash drive.



Key EIR Resource Areas and Technical Team Members

<p>Aesthetics & Visual Resources Rita Bright Marie Laule</p> <p>Agricultural Resources Rita Bright Erika Leachman Matt Buggert</p> <p>Air Quality/Greenhouse Gas Emissions Steve Ochs Laura Ingulsrud</p> <p>Biological Resources Angie Harbin-Ireland Jason Erlich</p>	<p>Cultural Resources Jesse Yorck, RPA, MA Laura Ingulsrud</p> <p>Geology & Soils Scott Kerwin, PG, CEG Marie Laule</p> <p>Hazards & Hazardous Materials Brian Londquist, RG Taylor Lane</p> <p>Hydrology & Water Quality Craig Stewart, PG, CHG Matt Buggert</p>	<p>Land Use & Planning Rita Bright Marie Laule</p> <p>Noise Brian Cook Marie Laule</p> <p>Public Services/Utilities Debra McGrew, PE Matt Buggert</p> <p>Transportation & Circulation Brian Fellows, PE Taylor Lane</p>
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Project Alternatives Rita Bright & Erika Leachman
Policy Consistency Review Rita Bright & Marie Laule
Other CEQA Analysis Laura Ingulsrud

Project Support Services:
Word Processing Janice Depew
GIS Aaron Johnson
Graphic Design Deirdre Stites
Administration Rosann Malloch, Rita Samaniego, and Tisha Martz

III.A KEY MANAGEMENT TEAM MEMBERS

Dan Gira – Project Principal

Mr. Gira has over 30 years of public agency and consulting experience, including 20 years of public agency environmental, land use planning, and management experience. As a public agency manager, he oversaw a long-range planning division with a staff of 26 professionals and an annual budget in excess of \$2 million. Mr. Gira has extensive experience with applying CEQA to a wide range of projects, including early determinations of what constitutes a project under the law and dozens of Initial Studies (IS) and Mitigated Negative Declarations (MNDs), which identify mitigation measures to permit complex projects to proceed forward without an EIR. Mr. Gira has prepared over 50 EIRs on a wide variety of projects, including 19 Program EIRs. He is currently Project Principal for the *Countywide Commercial Cannabis Cultivation and Manufacturing Regulations* Program EIR for Santa Cruz County, where he has assisted County staff with addressing the complexities of establishing a clear environmental baseline, identifying direct, indirect and secondary impacts associated with legalization, and bringing cannabis into compliance with the law. He has prepared the *Griffith Observatory Circulation and Parking Enhancement Plan* IS/MND for the City of Los Angeles and multiple EIRs for the City of Santa Monica, including the *Downtown Community Plan* Program EIR. He is Amec Foster Wheeler’s Program Manager for Land Use & CEQA. Mr. Gira is expert at community outreach and engagement and has managed multiple public outreach efforts, including dozens of community workshops and oversight of multiple citizen’s advisory panels. He typically works on projects subject to review by an informed and engaged citizenry and has provided presentations at more than 500 public hearings. Mr. Gira is 15 percent committed to the *Countywide Commercial Cannabis Cultivation and Manufacturing Regulations* Program EIR for Santa Cruz County and would have availability for this project.

DAN GIRA SPECIALIZED EXPERTISE
<ul style="list-style-type: none">➤ More than 30 years of CEQA experience➤ Experience with preparing environmental documents for major countywide planning projects➤ Familiar with environmental, planning and regulatory concerns that arise with ordinance development, including cannabis regulation

“I would like to commend Amec Foster Wheeler for the excellent environmental consulting services provided to the City of Los Angeles as we have navigated this key project through a complex regulatory process. Your team, led by Mr. Dan Gira with assistance from Nick Meisinger, has ably assisted the City in every step of the process and proved very responsive to City request for assistance.”

Joe Salaices, Superintendent, Griffith Park, City of Los Angeles
Griffith Park Circulation Enhancement Plan IS/MND

Rita Bright – Project Manager

Ms. Rita Bright has 30 years of environmental document, land use planning and permitting experience, including more than 20 years as a public agency planner and former County Deputy Director of the Division of Development Review. She has managed multiple EIRs ranging from programmatic documents that address land use planning initiatives, including general plan and ordinance amendments across hundreds of thousands of acres. As a Supervising Planning in Santa Barbara

County's Long Range Planning Division, she managed the Agricultural Element Implementation Programs, including environmental review for the countywide Agricultural Commercial Zone District, the Farmland Security Zone, and rezones of antiquated agricultural districts into the County's current zones. She is currently the Project Manager for the *Countywide Commercial Cannabis Cultivation and Manufacturing Regulations Program EIR* for Santa Cruz County where she has assisted the County with refining the cultivation and manufacturing ordinances, as well as with development of alternatives. She has experience preparing EIRs and MNDs in diverse communities, including the cities of Santa Monica, Ventura, Santa Barbara, Sunnysvale, and Fountain Valley. She has recently completed the *Cuyama Solar Facility and Comprehensive Plan/Land Use Development Code Amendments Project EIR* for Santa Barbara County, and the *Winery Ordinance Update Program EIR* to address winery development on over 370,000 acres for the County. Ms. Bright has provided presentations at over 400 public hearings and is expert at addressing and responding to public concerns. Her more than 20 years at Santa Barbara County provide her with a clear understanding of staff needs and expectations. Ms. Bright is 20 percent committed to the *Countywide Commercial Cannabis Cultivation and Manufacturing Regulations Program EIR* for Santa Cruz County and would have availability for this project.

RITA BRIGHT SPECIALIZED EXPERTISE

- Over 30 years of experience, including all aspects of complex planning regulations
- Management of two recently completed EIRs that address ordinance amendments affecting allowable uses on rural agricultural land, including cannabis regulation
- Experience speaking at over 400 public hearings

"Ms. Bright's role in providing planning and environmental consultation services...has been very effective and collaborative. Her expertise in CEQA and the fields of renewable energy development and general planning have been instrumental in the County's refinement of our Utility-scale Renewable Energy Project scope and analysis."

Kevin Drude, Former Deputy Director, Santa Barbara County Planning & Development Department

Erika Leachman – Deputy Project Manager

Ms. Leachman has 11 years of professional experience as an environmental planner and CEQA project manager, including EIR management and land use and community planning. As a senior planner at Santa Barbara County, she managed amendments to an Inclusionary Housing Ordinance and a Medical Marijuana Ordinance. As Deputy Project Manager for the *Countywide Commercial Cannabis Cultivation and Manufacturing Regulations* Program EIR for Santa Cruz County, she assisted County staff with exploring the wide range of cannabis cultivation, manufacturing and processing techniques to assist in ordinance development. She also has substantial experience acting as a Deputy Project Manager on complex Project and Program EIRs, including the *Downtown Community Plan* Program EIR for the City of Santa Monica, and the *Peery Park Specific Plan Master* EIR in Sunnyvale. She has also prepared IS/MNDs for the cities of Santa Monica and Ventura. Ms. Leachman is 35 percent committed to the *Countywide Commercial Cannabis Cultivation and Manufacturing Regulations* Program EIR for Santa Cruz County and would have availability for this project.

ERIKA LEACHMAN SPECIALIZED EXPERTISE
<ul style="list-style-type: none"> ➤ Over 11 years of professional planning and environmental experience, including 6 years as a senior planner with County P&D Long Range Planning Division ➤ Experience in EIR preparation for cannabis regulation, including medical and non-medical cannabis cultivation and manufacturing ➤ Expert in timeline and budget management ➤ Certified Amec Foster Wheeler Project Controller

“Peery Park was a much longer-term project than originally anticipated.... Dan, Rita, and Erika were with us 100 percent through the whole thing. I found everyone at Amec Foster Wheeler very straightforward and easy to work with and I would use them again anytime.”

Amber Blizinski, AICP, Principal Planner, City of Sunnyvale

III.B TEAM MEMBER QUALIFICATIONS

Our team offers an integrated and multi-disciplinary group of environmental and technical professions with recent experience working together to address the environmental impacts of complex regulatory programs consistent with CEQA, including cannabis-related ordinances.

Table 2. Amec Foster Wheeler Key Team Member Qualifications and Specializations		
Name and Project Role	Experience & Expertise	Role on this Project
<p>Dan Gira <i>Project Principal</i></p>	<ul style="list-style-type: none"> ➤ Over 30 years of CEQA public agency/consulting experience. ➤ Preparation of 19 Program EIRs and more than 30 project-level EIRs, including a Cannabis Regulations EIR. ➤ Provided presentation at over 400 community meetings and public hearings. 	<ul style="list-style-type: none"> ➤ Responsible for allocation of Amec Foster Wheeler staff resources. ➤ Will ensure project schedule expectations are met. ➤ Will assist with overall management and provide senior CEQA technical review

	<ul style="list-style-type: none"> ➤ Expert at establishing systems for tiering off Program EIRs and associated permit streamlining. 	<ul style="list-style-type: none"> ➤ Available to attend key meetings/ hearings.
<p>Rita Bright <i>Project Manager</i></p>	<ul style="list-style-type: none"> ➤ 30 years of CEQA public agency planning/consulting experience. ➤ Preparation of several Program EIRs for zoning ordinance amendments that implement regional planning programs, including a Cannabis Regulations EIR. ➤ Extensive experience translating EIR mitigations into effective ordinance amendment development standards. ➤ Experience with complex projects and public concerns. ➤ Expert with budget and schedule management. 	<ul style="list-style-type: none"> ➤ Responsible for team coordination and overall project management and direction. ➤ Will be key contact with County staff and subconsultants. ➤ Will attend all coordination meetings with the County. ➤ Will attend and provide presentations at all public hearings and meetings.
<p>Erika Leachman <i>Deputy Project Manager</i></p>	<ul style="list-style-type: none"> ➤ 11 years of experience in land use and CEQA environmental planning. ➤ Experience with medical and non-medical cannabis regulation and environmental impact analysis. ➤ Substantial experience with preparation of Program EIRs, including specific plan EIRs in the Los Angeles area. ➤ Experience with planning programs and costing. 	<ul style="list-style-type: none"> ➤ Responsible for day-to-day project operation and team coordination. ➤ Will ensure adherence to schedule and budget. ➤ Will be responsible for technical accuracy of key analyses and policy issues. ➤ Will attend and provide presentations at all public hearings and meetings.
<p>Julia Pujo <i>QA/QC Technical Editor</i></p>	<ul style="list-style-type: none"> ➤ 4 years of environmental planning experience. ➤ Experience with complex projects and public concerns. ➤ Experience with technical document preparation and publication of EIRs. ➤ Expert at document production and team coordination. 	<ul style="list-style-type: none"> ➤ Will provide final document quality control and ensure consistency with County standards and procedures. ➤ Available to assist with key Program EIR tasks if required. ➤ Will ensure consistency with County standards continuity of approach with other recent County EIRs.

<p>Brian Londquist, RG <i>Hazardous Materials Specialist</i></p>	<ul style="list-style-type: none"> ➤ 8 years of professional hazardous materials experience. ➤ Experience with hazardous materials site assessments and remediation. 	<ul style="list-style-type: none"> ➤ Oversee preparation of the Hazards and Hazardous Materials section. ➤ Provide general support for peer review.
<p>Angelique Harbin-Ireland <i>Senior Biologist</i></p>	<ul style="list-style-type: none"> ➤ 14 years of professional experience in conducting habitat assessments and surveys for special status species and the development and oversight of resource management and mitigation and monitoring plans. ➤ Extensive experience in collaborative solutions to land use planning issues, and knowledge of protected habitat types, listed species, and local natural resource protection policies. ➤ Senior biologist for a Cannabis Regulations EIR. 	<ul style="list-style-type: none"> ➤ Provide senior review and preparation for the Biological Resources section and any technical reports. ➤ Ensure consistency between technical reports and EIR analysis.
<p>Jason Erlich <i>Biologist</i></p>	<ul style="list-style-type: none"> ➤ 10 years of profession biological field experience. ➤ Specialization in GIS based habitat impact analysis. ➤ Biologist for a Cannabis Regulations EIR. 	<ul style="list-style-type: none"> ➤ Provide support for assembly of the Biological Resources EIR section. ➤ Support for peer review of biological field work.
<p>Scott Kerwin, RG <i>Geology and Soils Specialist</i></p>	<ul style="list-style-type: none"> ➤ 30 years of professional experience for geotechnical aspects of civil and land development projects. ➤ Extensive expertise with roads, dams, levees, landfills, tanks, hospitals, commercial structures, and pipelines. ➤ Responsible for evaluation of a wide variety of slope stability problems. 	<ul style="list-style-type: none"> ➤ Provide peer review of geological investigations and field work. ➤ Oversee preparation of the Geology and Soils section.
<p>Steve Ochs, PE <i>Air Quality Specialist</i></p>	<ul style="list-style-type: none"> ➤ 12 years of experience. ➤ Preparation of air quality and GHG models for CEQA and NEPA impact analyses. 	<ul style="list-style-type: none"> ➤ Preparation of air quality and GHG emissions estimates using CalEEMod. ➤ Provide emissions estimates and air dispersion modeling.

	<ul style="list-style-type: none"> ➤ Experience with multiple Air Basin, APCD, and CARB regulatory environments. 	
<p>Craig Stewart, PG, CHG <i>Hydrogeologist</i></p>	<ul style="list-style-type: none"> ➤ 30 years of experience. ➤ Preparation of geology and hydrologic analyses for CEQA and NEPA impact analyses. ➤ Experience throughout Central California. 	<ul style="list-style-type: none"> ➤ Provide senior expert input and review for the Hydrology and Water Resources section. ➤ Oversee preparation of the hydrology and water quality report.
<p>Debra McGrew, PE <i>Utilities Engineer</i></p>	<ul style="list-style-type: none"> ➤ 35 years of professional experience in design, construction, and consulting for water and wastewater infrastructure. ➤ Expertise in pump station design, pipeline analyses, materials evaluations, load and thrust analyses, and corrosion control. 	<ul style="list-style-type: none"> ➤ Provide senior expert input and review for the Utilities section and associated infrastructure information.
<p>Jesse Yorck, RPA, MA <i>Cultural Resources Specialist</i></p>	<ul style="list-style-type: none"> ➤ 17 years of experience in cultural resource management, with private, federal, state, and Native American agencies. ➤ Experience in historical building documentation and analysis in Los Angeles area 	<ul style="list-style-type: none"> ➤ Support for all report assembly. ➤ Review of Cultural Resources section.
<p>Brian Cook <i>Noise Specialist</i></p>	<ul style="list-style-type: none"> ➤ 15 years of experience associated noise generation and noise attenuation issues. ➤ Noise and operational hazards specialist. 	<ul style="list-style-type: none"> ➤ Oversee construction and long-term noise technical analyses. ➤ Address sensitive receptor issues.
<p>Brian Fellows, PE <i>Transportation Engineer</i></p>	<ul style="list-style-type: none"> ➤ 26 years of experience transportation planning ➤ Experience in impact assessment in California 	<ul style="list-style-type: none"> ➤ Support for all report assembly. ➤ Review of Transportation section.
<p>Aaron Johnson <i>GIS Specialist</i></p>	<ul style="list-style-type: none"> ➤ 14 years of experience. ➤ Lead GIS analysis for a Cannabis Regulations EIR. ➤ Skilled with large scale GIS land use and impact analyses 	<ul style="list-style-type: none"> ➤ Prepare environmental baseline GIS map and database. ➤ Prepare Project Description GIS maps and database.

<p>Matt Buggert <i>Environmental Analyst</i></p>	<ul style="list-style-type: none"> ➤ 2 years of experience. ➤ Experience with a Cannabis Regulations EIR. ➤ Experience with CEQA alternatives analysis related to agricultural land conversion. 	<ul style="list-style-type: none"> ➤ Provide initial data collection support. ➤ Prepare EIR sections as needed.
<p>Laura Ingulsrud <i>Environmental Analyst</i></p>	<ul style="list-style-type: none"> ➤ 1 year of experience. ➤ Prepared resource area sections for multiple complex EIRs. ➤ Experience with a Cannabis Regulations EIR. ➤ Experience in air quality and GHG emissions modeling. 	<ul style="list-style-type: none"> ➤ Provide initial data collection support. ➤ Prepare EIR sections as needed.
<p>Taylor Lane <i>Environmental Analyst</i></p>	<ul style="list-style-type: none"> ➤ 1 year of experience. ➤ Prepared resource area sections for multiple complex EIRs. ➤ Experience with a Cannabis Regulations EIR. ➤ Experience in air quality and GHG emissions modeling. 	<ul style="list-style-type: none"> ➤ Provide initial data collection support. ➤ Prepare EIR sections as needed.
<p>Marie Laule <i>Environmental Analyst</i></p>	<ul style="list-style-type: none"> ➤ 1 year of experience. ➤ Prepared resource area sections for multiple complex EIRs. ➤ Experience with a Cannabis Regulations EIR. 	<ul style="list-style-type: none"> ➤ Provide initial data collection support. ➤ Prepare EIR sections as needed.

***Full resumes for new team members are including on enclosed flash drive.*

Table 3. Amec Foster Wheeler Key Team Member Estimated Hours			
TITLE	NAME	ESTIMATED HOURS	% TOTAL HOURS
Project Principal	Dan Gira	120	5.17%
Project Manager	Rita Bright	252	10.86%
Deputy Project Manager	Erika Leachman	512	22.06%
QA/QC Technical Manager	Julia Pujo	50	2.15%
Senior Hydrologist	Craig Stewart, PG, CHG	14	0.60%
Senior Geologist	Scott Kerwin, PG	8	0.34%
Utilities Engineer	Debra McGrew, PE	18	0.78%
Noise Specialist	Brian Cook	11	0.47%
Biologist	Jason Erlich	7	0.30%
Biological Resource Specialist	Angie Harbin-Ireland	14	0.60%
Archeologist	Jesse Yorck, RPA	18	0.78%
Air Quality Specialist	Steve Ochs	30	1.29%
Hazardous Materials Specialist	Brian Londquist, RG	18	0.78%
Transportation Engineer	Brian Fellows, PE	22	0.95%
Senior Environmental Analyst	Matt Buggert	274	11.81%
Environmental Analyst	Marie Laule	274	11.81%
Environmental Analyst	Laura Ingulsrud	274	11.81%
Environmental Analyst	Taylor Lane	195	8.40%
GIS Analyst	Aaron Johnson	140	6.03%
Project Administrator	Rosann Malloch	12	0.52%
Word Processing	Janice Depew	40	1.72%
Administrative	Rita Samaniego	18	0.78%
TOTAL DIRECT LABOR		2,321	100.00%

IV. STUDY METHODOLOGY

IV.A GENERAL DESCRIPTION OF CEQA METHODOLOGY

Amec Foster Wheeler understands that the EIR must address direct, indirect, and cumulative environmental impacts associated with construction and operation of commercial cannabis cultivation and related activities under the Project. From the RFP, resource areas to address in the EIR include Aesthetics, Agriculture, Air Quality, Biological Resources, Hazards/Hazardous Materials, Hydrology/Water Quality, Noise, Transportation/Traffic, and Utilities and Service Systems, including energy issues, as well as standard CEQA Mandatory Findings of Significance. Based on our recent experience with cannabis regulation impact analysis, we suggest that additional resources to address also in the EIR analysis include Cultural Resources, Geology/Soils, Greenhouse Gases/Climate Change, and Public Services, as further described below. In addition, resources that would be addressed as less than significant under Other CEQA issues are expected to include Population/Housing, Forestry, and Mineral Resources. However, we would work with the County as part of Project kickoff and contracting to ensure the scope is suitable to the Project. For example, if through the NOP/Scoping process any Other CEQA issues are identified as creating potentially significant impacts, our team would prepare augmented analysis. We assume that the Project would not have any effect on CEQA issues related to population and housing; however, the analysis may identify potential impacts to population and housing if the Project results in changes to employment in the cannabis industry (e.g., jobs related to cultivation and product manufacturing). If this scenario arises, we would recommend the analysis include impacts to housing supply, including affordable/farmworker housing. If the County determines that



Our team has met with dozens of cultivators and toured over a dozen indoor, outdoor and greenhouse grows to understand cultivation processes, potential for environmental impacts, and neighborhood compatibility issues and concerns.



Our team has met with cannabis manufacturers to review techniques such as this rosin press which uses heated plates to press cannabis at 300 to 600 pounds per square inch to convert trimmings into rosin, a product with high THC content.

extensive additional resource analysis is required, our in-house specialists and land use planners would lead such analyses on a time and materials basis.

Description of EIR Components

Executive Summary: The EIR would include an Executive Summary with a condensed Project Description, project history, a brief description of impacts found not to be significant, issues of known public controversy, a matrix summarizing impacts and mitigation measures, and discussion of Project alternatives. As potentially the most referenced portion of an EIR, we would prepare the Executive Summary in an easily accessible format with summary tables and figures.

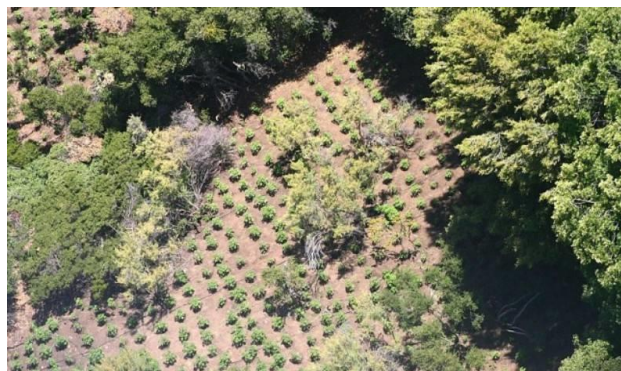
Introduction: The Introduction sets the stage for overall project consideration, the EIR's role in decision-making, the Project's overall purpose and need, a discussion of potential areas of controversy, and a clear description of the Project's objectives. We recognize that a clearly defined set of project objectives is central to supporting the alternatives analysis and is thus critical to the EIR's legal defensibility. This section would also provide a discussion of background information and technical data that help to inform the Project specifications and uses, including the applicability of MMRSA, AUMA, Proposition 215, SB 420, and the federal CSA, and the processes of indoor and outdoor cannabis activities currently employed in the County. This upfront analysis of cultivation techniques/technologies will provide context for the Project to support review of the Project and Alternatives by agencies and interested parties. We will work with County staff to ensure that the Introduction provides:

- A clear purpose and need statement for the Project in support of clearly defined objectives;
- A clear discussion of goals, objectives, and fulfillment of needs, including a summary of the Project in relation to County's objectives, goals, and policies;
- An introduction to the overall purpose of the EIR;
- A summary of the public review and Project approval process;
- A discussion of areas of known controversy and related background information;
- An overview of state law and standards for adequacy of the EIR, pursuant to CEQA Guidelines §15151; and
- A general discussion of the methodology and utility of the EIR to disclose applicable thresholds of significance and impacts that would result from construction and operation of the Project.

Environmental Setting: The Environmental Setting will provide an overview of the existing physical setting with a focus on key features and known environmental issues, including description of key features and constraints to cultivation, such as schools, libraries, state and local parks, alcohol and drug treatment facilities, County correctional facilities, municipal boundaries, public rights-of-way, and creeks, as well as groundwater basins, topography, vegetation, wildlife, and hydrology. This discussion will also identify other factors that may limit or encourage cultivation, such as state regulations or available information related to regional demand. Building from the Project's GIS, we would describe the environmental setting and use

appropriate photographs, maps, and diagrams to facilitate understanding of the area's environment, including a description of surrounding land uses, and appropriate planning area maps. We will coordinate with County staff to ensure that this baseline accurately reflects known information and conditions.

To address baseline conditions for cannabis cultivation sites currently operating in the County, our team would build from the licensing process data and other information collected as part of the Project setting. We understand the registration process will not capture all existing cannabis operations in the County. To augment the registration data and ensure a more complete and accurate depiction of the existing baseline, our team would draw on law enforcement and fire response data, calls for service, code enforcement, neighbor complaints,



The EIR analysis will include a GIS-based assessment of areas of the County that would be eligible for cannabis activities to allow for comparison with potentially sensitive resources.

aerial photography, online research, state-level databases, direct consultation with stakeholders and advocacy groups, and other readily available sources of information. If the opportunity is available, Amec Foster Wheeler would work with County staff to visit a representative subset of the County's existing cannabis operation sites and use that sample to better characterize the baseline conditions. Preparing the baseline conditions includes understanding the current level of impact in each EIR resource area described in Section IV.B, *Scope of Environmental Impact Analysis*, to enable comparison between the baseline and impacts that are expected under the Project and alternatives.

Project Description: The Project Description will provide the key elements of the Project and include Project area maps in sufficient detail to perform impact analysis. Amec Foster Wheeler will integrate and build upon the County-prepared Project Description into the EIR. Discussion of the relationship of the Project to County Code regulations and General Comprehensive Plan policies will be included. Amec Foster Wheeler would work with the County to ensure clear maps and graphics are employed to depict the expected changes to the Project area that would result from the Project using the Project's GIS, and to support key issues and analyses. Additionally, we would research and identify any applicable standard Best Management Practices (BMPs) that would reasonably apply to cannabis cultivation and include BMPs that the County would incorporate into the Project in the Project Description. Preparing the Project Description in advance of impact analysis and focusing on document clarity and accessibility will ensure the Project Description provides sufficient details to support environmental analysis for the Project.

Building from the environmental setting/baseline, we will work with County staff to customize the methodology for anticipating the demand for cannabis products and the resulting amount of cultivation and production that is likely to occur under the Project. The methodology will likely include the following steps:

- (1) Using the County’s Registry of existing sites and sites that are proposed to be used when licensing begins, we will map the extent and locations of existing cultivation sites and identify the areas or characteristics of the County that are currently most used for cultivation. For example, the clustering of existing sites in different zoning designations, vegetation types, and/or geographic locations may indicate the most suitable locations in the County for cultivation, which would indicate where continuing cultivation would likely occur under the Project.
- (2) Identify exclusion areas based on the proposed Project’s land use/zoning restrictions. This exercise may help to reduce the number of sensitive resources (e.g., biology, geology, sensitive receptors) that are potentially subject to adverse impacts.
- (3) If the opportunity is available, visit a representative sample of sites in different zoning designations and/or geographic locations where licensed cultivation may occur. The goal would be to assess the types of areas typically affected, the potential indirect effects, the extent of the cultivation area, etc. – to programmatically determine what resources might be impacted in different areas of the County where cultivation would be allowed.
- (4) Map the areas of the County where new or continued demand for cannabis operations under the Project is foreseeable under the Project, and describe the expected amount of cultivation and/or production, to the extent that information may be reasonably foreseen.
- (5) Use the results of the Project mapping to inform the Project Description and convey in the EIR what the potential for, and approximate magnitude of, impacts to various resources. This effort is not intended to provide a site-specific impact assessment where our team would assess impacts to individual cultivation sites, as any quantification we do under this approach would be of a program-level scale; this methodology would focus on the CEQA resources that could be impacted and disclose the approximate magnitude of potential impacts countywide. However, it is possible and intended that the EIR would be able to provide CEQA compliance for most future licensed cultivation sites if the sites are within the parameters of the Project Description, impact analysis, appropriately incorporate needed mitigation measures and/or BMPs, and comply with County Codes.

Environmental Impact Analysis: Amec Foster Wheeler’s approach to the format and content of the EIR is presented below. Our analysis of the Project and the Alternatives (see below) would analyze the potential impacts of the various components of the proposed Ordinance (such as minimum parcel size, zoning, setbacks, etc.) in a manner that will allow County decision-makers the flexibility to select among the elements of the Project “cafeteria style”. Each environmental resource area discussion would include the following subsections for the Project:

- *Existing Setting* describes the physical and human environmental setting that forms the baseline for the analysis of the Project and alternatives impacts. For this Project, this will include a description of the Project area features and an up-to-date description of any existing or planned public or private improvements in the area, including areas of cannabis cultivation and operations.

- Up-to-date local, federal, and state requirements for the resource areas are summarized in *Regulatory Setting*.
- The thresholds for determining impact significance and the impact analysis methodology are included in *Environmental Impacts*. Our team would work with the County early on to define the appropriate range of thresholds of significance for this unique Project from CEQA Guidelines Appendix G and the County's *Environmental Thresholds and Guidelines Manual*.
- The *Project Impacts and Mitigation Measures* will subsequently be identified. Each mitigation measure will include a stated condition, along with a mitigation monitoring component (*plan requirements, timing, and monitoring responsibility*). Mitigation will be tailored to be suitable for inclusion as new or modified Project provisions or other required actions that must take place prior to approval of permits and construction and/or operation of cannabis operations under the Project. To the extent feasible, BMPs identified as part of the Project Description will be referenced and applied to address potential impacts. This analysis will also evaluate how existing cultivation would change under the Project and would identify any beneficial impacts of the Project in alleviating existing environmental impacts from illegal cultivation.
- A clear statement of *Residual Impacts* after the application of mitigation for each resource area impact is considered with reference to the applicable threshold(s) of significance.
- A statement regarding the impact of the Project in conjunction with implementation of other past, present, and probable future plans and/or projects will be presented in *Cumulative Impacts*. We would work closely with the County at Project kickoff to identify the appropriate cumulative setting for the Project.

Alternatives: Amec Foster Wheeler will work closely with County staff to define up to three (3) alternatives for the Project, including the No Project Alternative and up to two (2) additional alternatives. The primary purpose of alternatives under CEQA is to reduce or avoid significant environmental effects while also attaining project objectives. Amec Foster Wheeler would work with County staff to review and consider alternatives capable of meeting Project objectives while minimizing or avoiding significant impacts. This would permit the County to weigh environmental, policy, and economic tradeoffs of various options. Amec Foster Wheeler will clearly set forth the requirements of CEQA Section 15126.6, which governs the type and range of alternatives that should be considered and factors that affect the feasibility of such alternatives (e.g., economic viability, site suitability, availability of infrastructure, etc.). Our goal will be to present the alternatives in a manner that permits straightforward comparison of impacts. Key issues addressed will include:



Alternatives Considered and Discarded: A discussion of alternatives considered and discarded is an important component of an adequate and legally sustainable alternatives analysis. Amec Foster

Wheeler would work with County staff to review various alternatives and identify those that appear infeasible or incapable of meeting Project objectives, or those that would create impacts that are significant or more severe than the Project. The reasons for discarding the alternatives would be described and could include different regulatory frameworks that would either not meet the Project's objectives or would cause greater damage to the environment and the community. The Alternatives Considered and Discarded analysis will provide a clear record of County decision-making for such issues, a crucial consideration when considering potential impacts of the Project.

- **No Project:** This analysis would briefly describe the impacts and benefits of not adopting the proposed Project. This would also include a discussion of continued uses and impacts under the existing County Code Article X. This alternative is required by CEQA.

Additional Possible Project Alternatives: Given cannabis-related activities are currently occurring in the County, an aspect of CEQA analysis for this unique type of baseline is to consider the environmental benefits that may be realized from a cannabis land use project that seeks to permit and manage existing “shadow operations”, operations that could be creating ongoing and potentially significant environmental effects. Our team has identified specialized cannabis-related CEQA alternatives that emphasize permitting and eligibility requirements, which by the nature of their permissiveness, could expand or contract cannabis licensing and the County’s oversight abilities:

- **More Permissive Alternative:** If an objective of the County is to convert “shadow growing” operations that can have significant resource impacts into licensed and permitted operations, a More Permissive Alternative may actually reduce environmental impacts of ongoing unlicensed cultivation under the Project. This analysis would maintain emphasis on meeting Project objectives while varying development standards, including adjustments to siting criteria that would accommodate an increased number of existing cannabis cultivators or operators, as indicated by the County’s Registry data. The analysis of this alternative would address potential impacts to determine if such adjustments could minimize or avoid significant environmental impacts/policy conflicts and address land use consistency concerns.
- **Less Permissive Alternative:** We would discuss with the County the tradeoffs and potential benefits and feasibility of a Reduced, or Less Permissive Alternative, particularly one that is consistent with feedback from the ad hoc committee. Possible options could include further limiting cannabis cultivation development by zoning, by increasing geographic constraints, or by establishing siting criteria to reduce land use conflicts and physical change to cannabis cultivation or operation sites.

Amec Foster Wheeler would work closely with County staff to identify required and desired alternatives, which could meet policy and economic goals within the broad policy framework. The analysis of alternatives would result in the identification of the Environmentally Superior Alternative (ESA) consistent with CEQA Guidelines Section 15126.6.

Cumulative Impacts: Cumulative impacts will be addressed in each resource section in a manner consistent with CEQA Guidelines §15130, considering implementation of other past, present, and probably future plans

and projects. We will work closely with County staff to identify the appropriate cumulative setting for the Project, including regional projects to address cannabis related to resource agencies (e.g., RWQCB, CDFW, CalFire, etc.). As stated in the Guidelines, the nature of each environmental resource being evaluated and the type and location of a specific project affect whether it is included in the cumulative analysis. The EIR will describe the impacts of all known and relevant existing and future land use in the County, as well as additional growth in nearby areas, with a focus on forecasted amount of cannabis products projected to be produced in the County and the region.

Mitigation Measures & the Mitigation Monitoring and Reporting Program (MMRP): The MMRP is a key element for implementation of long-term regulatory programs such as the Project. Crafting adequate and feasible mitigation and establishing mechanisms for tracking implementation will be key to both addressing potential impacts and ensuring concerned agencies or members of the public that the Project can be safely implemented and that ongoing monitoring and reporting will be provided. Mitigation measures will be developed in coordination with County staff and appropriate agencies for all significant Project-specific and cumulative impacts and for adverse but insignificant project and cumulative impacts, as appropriate. We will build such measures from applicable existing County programs and regulations, including the County Code, and tie mitigation to required actions or County authorizations (e.g., grading and building permits). We would create a useable MMRP in table format for easy tracking, along with clearly crafted mitigation measures for each potentially significant impact (responsible party, required timing, relationship to the Project, monitoring milestones, etc.). Tracking and monitoring would involve the use of checklists and forms for regular reports to the County. Amec Foster Wheeler has extensive experience translating mitigation into enforceable requirements of approvals, such as licenses. These would be accompanied by clear and realistic goals for implementation, timing, and identification of potential funding sources.

Residual Impacts: After implementation of mitigation measures, residual impacts will be discussed and the level of significance identified.

Other CEQA Sections: Other CEQA Sections include an introduction, summary impact table, resources areas that are determined to be less than significant (e.g., mineral resources) based on the NOP and scoping process, nonrenewable resources, and growth-inducing impacts. CEQA Guidelines, §15358(b), states that growth-inducing effects analyzed under CEQA must be related to a physical change in the environment. Therefore, the focus of the growth-inducing section will be focused on the potential for the Project to have adverse or beneficial effects on County services (e.g., sheriff, fire, water supply, etc.). See Section IV.B, *Scope of Environmental Impact Analysis* for additional details.

Bibliography and List of Preparers: Our team will maintain the list of resources referenced and cited in the EIR on an ongoing basis to ensure a complete administrative record to accompany delivery of the EIR to the County. We will also identify EIR preparers and any persons, firms, or agencies consulted in the development of the EIR.

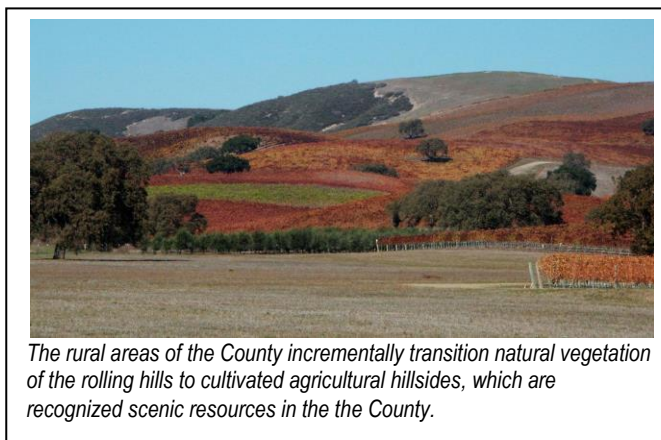
Technical Appendices: The technical appendices in the EIR will include Project-specific studies. Also included will be any studies deemed necessary to support EIR analysis and conclusions. To ensure a concise EIR, technical background and studies prepared by Amec Foster Wheeler to support analysis of resources would be collated and provided as a technical appendix to the EIR.

IV.B SCOPE OF ENVIRONMENTAL IMPACT ANALYSIS

Amec Foster Wheeler would structure the analysis within the EIR to address overall impacts of the proposed Project, using a format that is similar to other Amec Foster Wheeler-prepared County EIRs, and to the extent possible, incorporate and build upon data and analysis from recent EIRs, other relevant County planning and environmental documents, and any other recent environmental documents or technical studies. Throughout this environmental assessment process, we would work closely with County staff to ensure analysis supplements previous studies and craft mitigation measures that appropriately address Project impacts. We would focus evaluation on the following resource areas:

Aesthetics and Visual Resources:

The County supports diverse important scenic resources, from the coastal terrace and ocean views along the south coast and pristine Gaviota Coast, to the iconic oak savannahs and grazing lands of the Lompoc and Santa Ynez Valleys, to the large expanses of farmland in the Santa Maria and Cuyama areas. This inherent visual quality results from the natural and agricultural/rural environment. Scenic roads, such as State designated Scenic Highway 154, U.S. Highway 101 along the Gaviota Coast, and



State Highway 1 from U.S. Highway 101 to Lompoc, afford public views of scenic undeveloped areas, largely undeveloped open space, and agricultural lands, which are recognized as scenic resources in County plans. Impacts to these key visual resources may result from grading of hillsides, fencing, light and glare from greenhouses, and conversion of existing agricultural/grazing land to support cannabis cultivation and related activities, as well as limited effects on neighborhood aesthetics associated with indoor cultivation in commercial, industrial, and potentially agricultural areas. Amec Foster Wheeler would approach the analysis of aesthetic and visual issues within the existing County policy framework, which stresses the importance of scenic resource preservation. To address potential aesthetic impacts, we would:

- Characterize the existing physical setting in terms of public views and scenic vistas, state and local scenic routes, gateways, rural areas and neighborhoods, and relevant aspects of the built and natural environment, including the character of small towns, public open space, and recognized landmark, iconic and historic structures.

- Review information gathered during public outreach to better understand and address public concerns, particularly at a neighborhood level.
- Describe potentially scenic resources within or adjacent to the County, including areas outside of adopted community plan boundaries that have not received specific recognition or analysis in the countywide 1980 Land Use Element or subsequent planning effort.
- Describe adverse and beneficial changes to the visual character of the County associated with allowable development of cannabis cultivation sites, accounting for the existing resource protective policy framework and proposed development standards, and resultant incremental changes to both local and regional features, including public viewsheds, night-lighting, construction of new buildings, and driveways/roads, particularly as visible from state and local scenic routes, as well as to public views in towns and neighborhoods.
- Identify direct and indirect impacts associated with the proposed Project due to loss of scenic resources, obstruction of scenic views, loss of open space and public vistas, effects on vegetation, increased or decreased light, construction of support facilities and fencing, and overall changes in community character, while ensuring the analysis accounts for existing policies and proposed Project development standards.
- Use graphics and photographs to illustrate and describe potential Project-specific and cumulative changes in the character of the County, including photographs of existing cultivation sites to illustrate potential changes to existing view corridors, including damage to or loss of vegetation, hillside grading, etc.
- Identify mitigation measures, including potential refinements to Project development standards, (e.g., cultivation siting and scale, site regulations and design, setbacks, and vegetation protection measures), and possibly added protection of public view corridors along local scenic routes.

Amec Foster Wheeler's certified visual resource specialist Rita Bright would oversee this effort assisted by Marie Laule, an Environmental Analyst.

Agricultural Resources:

The County includes large areas of prime and non-prime soils that currently support grazing operations, as well as a wide range of productive cultivated agricultural operations, including vineyards, berries, alfalfa hay, walnut, and stone fruit orchards and truck crops. Implementation of the proposed Project could utilize and/or cover prime and non-prime soils or displace existing crop and grazing land. Existing crop and grazing land could be lost with the potential conversion of food crops and grazing land to cannabis cultivation, as well as the conversion of existing agricultural buildings to indoor cultivation sites, especially if construction of new buildings occurs to replace functionality lost when existing buildings convert to cannabis cultivation. In this way, the Project could have an overall effect in the composition of agricultural products being produced in the County and may have different requirements for cultivation, including water use, equipment, employees, peak season activities, harvesting, trimming, soil preparation with fertilizers and pesticides, and use of rodenticides and other wildlife control. To address such potential impacts, we would:

- Describe existing agricultural operations in the County, including cultivated agriculture, grazing and equestrian operations, crop types and acreages, and general locations based on available data from existing sources, including the Agricultural Commissioner's Agricultural Production Report, Statewide Important Farmland Maps, Williamson Act contracts in the County, and recent EIRs. Our team would utilize maps based on available crop data (e.g., crop type, acreage, greenhouses) to depict the relationship between existing agricultural operations and proposed cannabis operations under the proposed Project.



The Project could change the composition of agricultural production. For example, greenhouses that historically produced cut flowers or berries could have a portion converted for the purpose of growing cannabis.

- Summarize the current policy and regulatory setting regarding Agricultural Resources, including the Agricultural Element and Implementation programs, County Uniform Rules, and Right to Farm Ordinance.
- Assess potential for direct and indirect impacts to agricultural resources from adoption of the Project, including loss of prime and non-prime soils, conflicts with surrounding agricultural operations, such as a general analysis of increased water demand and possible effects on local wells, increased traffic/conflicts with farm equipment use of rural roads, noise, dust, lighting, etc.
- Describe cumulative impacts to agricultural resources from existing and new cannabis cultivation sites and other pending development projects.
- Identify mitigation measures to reduce impacts to agricultural resources, such as siting criteria to minimize loss of prime soils and conflicts with adjacent agriculture, setbacks from or screening of adjacent agricultural operations, etc.

Amec Foster Wheeler's Project Manager Rita Bright would oversee this effort with assistance from Environmental Analyst Matt Buggert.

Air Quality and Greenhouse Gas Emissions:

The Air Quality and Greenhouse Gas/Climate Change section(s) would document existing climatic and air quality conditions in Santa Barbara County, relevant Air Pollution Control District (APCD), State, and Federal regulatory standards and thresholds, and describe attainment/non-attainment pollutants for the South Central Coast Air Basin. Particular attention would be paid to potential generation of objectionable odors. Odor impacts are expected to be focused upon operation related activities of cannabis cultivation sites throughout the County, including fumes from equipment and cannabis odor during harvest, trimming, storage, manufacturing, and transport activities.

Additionally, the March 2010 revisions to the CEQA Guidelines require evaluation of potential impacts to climate change. The issue of global climate change involves environmental implications beyond air quality, affecting hydrology and water supply and quality, agriculture, open space, and ecosystems and wildlife.

Accordingly, the issue of climate change typically involves an analysis of whether a project's contribution of greenhouse gases (GHGs) towards an impact is cumulatively considerable such that it constitutes a significant cumulative impact. This section of the EIR will briefly evaluate the GHG emissions associated with the proposed land uses, and identify the need for additional mitigation measures where necessary. The analysis will consider both potential short-term construction-related and potential cumulative impacts to GHG emissions associated with development of the County.

In order to provide a defensible analysis of potential Air Quality and GHGs impacts, our team would conduct the following:

- Describe existing conditions within the South Central Coast Air Basin and in the Project vicinity, including attainment status for criteria pollutants, climatic conditions, and local emissions sources and sensitive receptors, such as schools, elder care facilities, park visitors and adjacent neighborhoods. Our team will also describe contributors to local air emissions.
- Provide a brief up-to-date description of the current regulatory setting regarding Air Quality and GHGs, including APCD rules related to odors.
- If feasible, coordinate with County and APCD staff to develop scenarios to allow modeling of air emissions of the Project using the California Emissions Estimator Model (CalEEMod) 2016.3.1, or latest version.
- Per the APCD's *Scope and Content of Air Quality Sections in Environmental Documents*, GHG emissions from mobile sources (autos and trucks) will be estimated using CalEEMod to the extent possible. If data is readily available, operational sources (water heating and space heating equipment), and indirect emissions from electricity usage and other activities (such as solid waste disposal, water conveyance, and wastewater conveyance and treatment) will be estimated using CalEEMod.
- Assess consistency with the policies and measures recommended by the APCD, the Attorney General, the County's Climate Action Plan, and the Sustainable Communities Strategy (SCS) that was recently adopted by SBCAG. As appropriate, new or revised policies and programs will be recommended to address any identified inconsistencies with applicable climate change policies.
- Briefly analyze the Project's consistency with the most recent Clean Air Plan (2013) to determine whether proposed changes in land use and development patterns would interfere with progress toward the attainment and maintenance of State and Federal ambient air quality standards.
- Address issues related to construction and operational emissions, including objectionable odors. Amec Foster Wheeler's Air Quality Specialist would perform a screening level assessment of objectionable odors related to both outdoor and indoor cultivation sites. Our analysis will consider proximity of sensitive receptors and best available data on how odor degrades or diffuses over distances.
- Identify mitigation measures for air quality and GHG impacts, including BMPs to help reduce objectionable odor impacts to the maximum extent feasible.
- Describe cumulative impacts associated with the proposed Project in the vicinity.

Amec Foster Wheeler's Air Quality Engineer, Steve Ochs, PE, will oversee this effort with assistance from Environmental Analyst, Laura Ingulsrud.

Biological Resources:

The County encompasses a diverse range of habitats, including wetlands of the Goleta Slough and Carpinteria Salt Marsh, grasslands, oak woodland and savannah, sage scrub and chaparral, and riparian woodlands along the Santa Ynez and Santa Maria Rivers, as well as on major streams, such as Maria Ygnacia Creek, San Jose Creek, and Carpinteria Creek. Cannabis licensing under the Project may result in incremental direct loss of vegetation and habitats due to grading and vegetation removal to prepare for new cannabis cultivation sites and associated structures, potential interference with wildlife from cultivation activities and management including rodenticide and pesticides, and possible secondary consequences, such as aquifer drawdown from new wells and indirect impacts to riparian habitats. Additional indirect adverse effects on sensitive species could include increased water demand, noise, fences and night-lighting, and increased human activity in open spaces. To the extent that the Project promotes installation of new cultivation sites and cannabis development projects, secondary effects of such activity would also be described.

To address potential impacts to the biological resources within the County, our team would:

- Describe existing biological resources in the County based on data from existing sources such as state and federal data (e.g., critical habitat designations, California Natural Diversity Database) and local County data including potential known sensitive vegetation and habitats (e.g., valley oak savannah) and special status species (e.g., California tiger salamander, California red-legged frog).
- Summarize best available data and reports on impacts from cannabis cultivation on wildlife (e.g., the Mitigated Negative Declaration for the Humboldt County Medical Marijuana Land Use Ordinance, Public Library of Science (PLOS) One Journal, etc.).
- Identify any relevant policies and ordinances that govern biological resource protection, including relevant Community Plan policies and development standards, those from the 1980 Land Use Element, and relevant State and Federal regulations (USFWS, CDFW, etc.).
- Assess potential direct and indirect impacts of the Project on biological resources, particularly oaks and oak habitats, riparian corridors, wetlands, and special status species. Such impacts could include direct loss of habitat, incremental impacts of cumulative cannabis cultivation through direct habitat removal, increased disturbance, changes in runoff or clearance for fire protection. This assessment would also address the impacts of existing cannabis sites that may relocate, and the establishment of new sites.
- Describe potential cumulative impacts to biological resources associated with other pending development proposals, and/or County projects or programs.
- Identify potential mitigation measures as needed to address impacts of growing operations and associated construction necessary to bring an existing or proposed site into conformance with Project requirements, including adjustments to existing and proposed policies and developments standards, as needed (e.g., increased setbacks, extension of utility lines, bridge construction, driveway access, restoration requirements, etc.) and requirements for BMP cultivation practices.

Amec Foster Wheeler's Biologist, Angie Harbin-Ireland, would oversee this effort with technical support from Environmental Analyst Taylor Lane.

Cultural Resources:

The County contains many recorded archaeological sites, and known historic resources and buildings, as well as the potential for unrecorded archaeological sites, historic structures, and landscapes. Potential for development of cannabis cultivation sites, supporting structures, parking areas, and driveways could impact both known and potential cultural resources. To address potential impacts to cultural resources, our team would:

- Review existing County records and GIS data to determine the areas of cultural sensitivity for the environmental baseline analysis. Consult with County staff regarding the Inventory of Historic Resources. Review available published and unpublished geologic mapping and literature to identify the general geology and paleontology of the County.
- Provide a brief overview of the County's history, including the Native American, Spanish/Mexican and American periods.
- Initiate consultation with the NAHC and review the list of Native American individuals and organizations that may be knowledgeable about the County, consistent with the Tribal Consultation Policy adopted by the California Natural Resources Agency. We would also assist the County with required Assembly Bill (AB) 52 consultation at the outset of the Project in order to obtain early feedback on tribal cultural resource issues, as well as required Senate Bill (SB) 18 consultation prior to amending or adopting any general plan amendment, if needed. Consultation letters seeking input on cultural resources potentially affected by cannabis cultivation sites, and follow-up phone calls, will be addressed to each tribal representative recommended by the NAHC.
- Describe existing known cultural resources, including general description of known pre-historic sites and the locations of known historic structures.
- Assess the potential for direct and indirect effects on cultural resources, including direct disturbance of subsurface remains, conversion or demolition of historic structures, and increased activity within areas of cultural significance.
- Describe cumulative impacts associated with existing and future cultivation sites in the County.
- Identify potential mitigation measures during as needed to address impacts, building from existing County Code regulation for adequate response to discovery of cultural resources. The impact analysis will address whether existing County Code requirements are sufficient to mitigate potential impacts to cultural resources from implementation.

Amec Foster Wheeler's Cultural Resource Specialist Jesse Yorck, RPA would oversee this task with assistance from Laura Ingulsrud, our Environmental Analyst.

Geology & Soils:

The County encompasses diverse topography and geologic features and soils, including level valleys, steep foothills and mountains, known and potential earthquake faults and seismic hazards, and a wide range of soil types with varying constraints (e.g., expansion, liquefaction). New and existing cannabis cultivation sites under the Project could both be impacted by regional seismicity, unstable slopes and soils, and other geotechnical hazards, and be contributing factors to those hazards where grading and erosion are not well controlled. Indoor cannabis operations could also be subject to earthquake hazards. To address potential impacts to geologic resources for the Project, Amec Foster Wheeler's team will:

- Review existing available maps and data regarding the geologic hazards (e.g., Dibblee Digital Geologic Map Collection, Seismic Safety Element, Alquist-Priolo maps, and maps suggested by County technical staff), focusing on key geologic or soils constraints, particularly for the areas projected for existing and new cultivation sites.
- Describe the existing geologic setting, including a general characterization of County terrain, soils, seismicity, and other geologic features, such as groundwater basins and faults.
- Describe the existing regulatory setting, including the County's Seismic Safety and Safety Element, Grading Ordinance, existing community plans and Land Use Element policies, the Alquist-Priolo Act, Uniform Building Code, etc.
- Assess direct, indirect, and cumulative geologic hazards and impacts posed by new cannabis cultivation and related operations, including grading for terracing and access roads, which may have the potential to increase erosion, landslides, unstable slopes, sedimentation, and seismic hazards (fault rupture, ground shaking, liquefaction, expansive soils). The analysis will be a screening level analysis that identifies any potential "fatal flaws" for cannabis sites.
- Assess the effectiveness of the existing regulatory framework adequacy with respect to siting, grading and slope constraints, hillside development, and erosion control to reduce potential impacts.
- Identify recommended mitigation measures as needed to address geologic impacts, building from the California Building Code and the County Code. Our team would identify any applicable existing regulations or BMPs identified in the Project Description to address potential geologic effects of the Project.



Cannabis cultivation sites require grading, vegetation clearing, and site preparation activities. The EIR would address measures to control erosion, stabilize soils, and restore disturbed areas to the extent feasible.

Amec Foster Wheeler Senior Geologist, Scott Kerwin, would oversee this task with assistance from Marie Laule, Environmental Analyst.

Hazards & Hazardous Materials:

Cannabis cultivation could require the use of fertilizers, pesticides, herbicides, and rodenticides, all of which are hazardous materials to the natural environment. Additionally, cannabis product manufacturing may involve use of hazardous materials, such as flammable solvents, and/or hazardous equipment. To evaluate potential hazards and hazardous materials-related impacts associated with the storage, handling, and application of these hazardous materials for the Project, Amec Foster Wheeler would:

- Review existing available/applicable data, reports, and hazardous materials reporting records, specifically related to agricultural use of fertilizers, pesticides, herbicides, and rodenticides, including data prepared for recent environmental documents.
- Conduct a targeted records search of available hazardous materials databases (i.e., Envirostor, Santa Barbara County Fire Department [SBCFD]) for areas affected where cultivation may occur.
- Describe the hazards and hazardous materials setting for the County based on existing reports and maps, including the Hazardous Waste Element and Hazardous Materials Management Plans from the Department of Environmental Health.
- Assess hazards and hazardous materials impacts from cultivation and manufacturing sites by considering storage, handling, and application practices of hazardous materials (e.g., open blast concerns associated with butane hash oil (BHO) processes of non-licensed manufacturers).
- Identify mitigation measures necessary to address hazards and hazardous material concerns, including consideration of existing regulation and BMPs, or development standards to address how and where hazardous materials would occur on cultivation sites.

Brian Londquist, RG, Amec Foster Wheeler's Hazardous Materials Specialist would oversee preparation of this analysis, with assistance from Environmental Analyst, Taylor Lane.

Hydrology & Water Quality:

The County is traversed by major drainages, such as the Santa Ynez and Santa Maria Rivers and Gaviota and San Antonio Creeks, as well as numerous smaller creeks, such as Maria Ygnacio, Tepusquet, and Carpinteria Creeks. Construction of new cultivation sites could impact in-stream water quality and hydrology through increased grading, vegetation clearing, erosion, and sedimentation or be impacted by flood flows from nearby rivers and creeks. Note that municipal water supply and demand would be addressed under *Utilities and Service Systems*. To address hydrology and water quality issues for the Project, Amec Foster Wheeler would:

- Describe the existing hydrologic setting that is sufficiently detailed to support a programmatic analysis of potential impacts to resources. This would be based on existing available federal, state, and County maps and data, including the FEMA Flood Insurance Rate Maps, available hydrology and groundwater studies, and consultation with water management agencies and purveyors in the County.
- Provide an estimate of current water use, which varies with cultivation practice, and characterizing of water sources for existing cultivation operations, and analyze any change in water use associated with new cannabis cultivation and potential crop conversion to accommodate cannabis, and change of use in

commercial buildings to accommodate cannabis cultivation and manufacturing, after implementation of the regulatory and licensing program. Assess impacts of importing water to cultivation sites and impacts to aquifers (e.g., overdraft, seawater intrusion).

- Describe the existing regulatory setting for management of ground and surface waters within the County, including Project Clean Water Storm Water Management Program, County Flood Control and Floodplain Management Plan, Regional Water Quality Control Board's the Basin Plan, etc.
- Assess potential direct and indirect impacts of cannabis cultivation sites, accounting for the effectiveness of existing regulations, including risk of exposure to flood hazards, potential for increased grading, sedimentation, and increases in polluted runoff, increased water demand from new cultivation operations, and potential impacts to groundwater supplies, including potential secondary impacts associated with cannabis cultivation or other cannabis-related activities. We would also evaluate impacts from bulk water delivery and steam diversions to cultivation sites.
- Describe potential cumulative impacts to water resources associated with the proposed Project along with other pending projects in the area.
- Identify mitigation measures necessary to reduce the severity of impacts to water resources, including modification to proposed development standards, implementation of BMPs, and conservation and Low Impact Development (LID) criteria that minimize use, runoff and erosion/ sedimentation.

Amec Foster Wheeler's Senior Hydrogeologist Craig Stewart, PG, CHG would oversee this analysis with assistance from Matt Buggert, an Environmental Analyst.

Land Use and Planning:

The County encompasses tens of thousands of acres, including large tracts of primarily rural agricultural land, as well as areas where agriculture and ranchette or estate residential uses abut agricultural lands in production. Land use and development within the County is governed by a range of County plans and policies, including those from the 1980 Land Use Element, the 1991 Agricultural Element, the amended 1980 Circulation Element, the eight community plans, and a range of County and state regulations and ordinances. A land use concern is the potential for intensified cannabis operations to create conflicts with nearby rural residential uses related to noise, odors, dust, security, and traffic associated with development and operation of cannabis cultivation sites. In addition, the proximity of commercial agriculture and sensitive uses can result in conflicts between County policies, which strongly promote agricultural uses and those which protect rural area quality of life and neighborhood character. Land use analysis will need to address how much cultivation and cannabis-related activities is projected in each zoning district and consider the tradeoffs related to conversion of existing uses to cannabis cultivation.

We would work closely with County during the kickoff process to ensure a clear understanding of key policy issues to be addressed in the EIR. In particular, we would address potential policy consistency issues regarding the conversion of existing space in industrial and commercial areas to cannabis activities, neighborhood compatibility, resource preservation, traffic congestion, and other land use issues of possible community concern while acknowledging the priority placed on commercial agriculture by County Agricultural

Element policies and the Right to Farm Ordinance and impacts associated with crop conversion. To address these land use and development issues, our team would:

- Review existing relevant data sources (e.g., past staff reports, public comments) to briefly describe existing agricultural land use and residential neighborhoods, projected changes in agricultural and warehouse/industrial development patterns, and uses that may result if food crops and industrial operations are converted to cannabis cultivation, including small (i.e., home occupation) to large scale (e.g., warehouse) cannabis operations.
- Identify potential key land use goals and policies as they relate to the proposed Project, including the County's Comprehensive Plan, such as the Land Use and Agricultural Elements, Right-to-Farm Ordinance, Community Plans, Grading Ordinance, etc.
- Provide an overview of the existing policy framework regarding both urban and rural issues, particularly the Land Use Element, Conservation Element, Open Space Element, housing and resource protection policies, and neighborhood compatibility. Identify both direct and indirect impacts associated with existing and new cannabis cultivation sites, including impacts resulting from the construction of homes in compliance with the proposed Ordinance.
- Assess potential direct, indirect, and cumulative land use impacts of existing and new cultivation sites, particularly those that would impact existing agricultural operations and those near existing communities.
- Identify potential mitigation measures as needed to address any adverse land use impacts, including adjustments in proposed geographic restrictions, canopy size limits, and setbacks.

Erika Leachman, Amec Foster Wheeler's Deputy Project Manager would oversee this effort with assistance from Marie Laule, Environmental Analyst.

Noise:

Cannabis operations can produce nuisance noise during planting and harvest while development and operation of cannabis facilities can create additional increased noise due to incremental increases in traffic or security. To address potential impacts related to noise, our team would:

- Describe the existing noise setting, focusing on roadway corridor and agricultural operation-related noise particularly in relation to proximity with sensitive receptors such as residential uses, schools, and hospitals.
- Consider both short-term construction impacts and long-term operational impacts. Short-term or construction-related analysis would describe sensitive receptors within the vicinity of anticipated cannabis-related cultivation and operations. Construction-related noise at sensitive receptor locations will be described based on typical construction noise levels reported by the U.S. Environmental Protection Agency and the distance to receptor locations.
- Analyze long-term impacts based on potential increased traffic along roadways associated with changes or intensification of cannabis-related operations. We will use available noise contour maps, existing information on rural noise levels, and past environmental documents to determine whether the land use changes may result in exposure to excessive noise.

- Assess the adequacy of recommended development standards to reduce noise levels and describe potential for noise levels to exceed regulatory standards or to create a substantial nuisance. Noise control requirements would be considered for inclusion in policies or development standards, if appropriate.

Brian Cook, Amec Foster Wheeler's senior noise analyst, would prepare this section with assistance from Environmental Analyst, Marie Laule.

Public Services:

The Project may incrementally increase demand for public services, particularly fire and police protection. Incremental increases in demand for code enforcement along with other services (e.g., road maintenance) may also occur. We would provide brief overview of public service issues and focus on services that could be adversely affected by the Project. Most of the County is designated as a high fire hazard area by the County of Santa Barbara and is served by a range of fire stations operated by the SBCFD and CalFire, as well as U.S. Forest Service firefighters. In the event of fire, emergency access to cannabis sites is critical to ensure adequate and timely response from SBCFD resources. County standards generally require primary and secondary access to new structures; however, the potentially remote rural locations may present response challenges. The County is served by a range of police stations operated by the Santa Barbara County Sheriff's Department and the City of Santa Barbara Police Department, as well as the California Highway Patrol. To assess potential public service impacts, we would:

- Review available information on public services in the County and confirm any known public service issues or demands associated with existing cultivation sites through consultation with appropriate public service providers to focus the analysis, most likely on fire protection and law enforcement services.
- Review and confirm existing staffing, equipment, and response times from fire protection agencies, particularly SBCFD; consult with the County Sheriff's Department and Fire Department and the California Highway Patrol to identify any potential issues or concerns, as well as any other public service issues.
- Assess fire protection issues and potential increases in demand for other public services associated with cannabis cultivation and production sites (e.g., access, response times, defensible space, etc.) or accounting for existing regulations and development standards.
- Evaluate the impacts of the Project to SBCFD resources and the potential for the Project to increase risk of fire, and increased demand for fire protection or other public services associated with cannabis cultivation site development, including an evaluation of the cumulative effects of regional development trends.
- Identify mitigation measures necessary to reduce public service and fire protection impacts, including Project modifications or components that minimize risk of fire and strain on existing firefighting and law enforcement resources and abilities to respond adequately to fire and code enforcement issues.

Amec Foster Wheeler's Deputy Project Manager, Erika Leachman, would oversee this effort with assistance from Matt Buggert, an Environmental Analyst.

Transportation and Traffic:

The County is served by a network of highways, primary and secondary roads, and rural roadways that extend across the County. State Highways are managed by Caltrans while local roadways are managed by the County Public Works Department. Community Plans and the countywide Circulation Element provide primary policy guidance for traffic capacity on these roads while the County's Road Design Manual provides design standards. Many of the County's local roads are narrow, lack road shoulders, and are windy in places. These narrow roads often carry large farm equipment and trucks, particularly during planting and harvest time. Many these roads also support substantial recreational bicycle traffic. Development of cannabis cultivation sites could increase vehicular traffic and potentially add more equipment to the road network, along with increase employment in the County's rural areas. To address potential transportation impacts, our team would:

- Review existing County traffic volume data, project trip generation/distribution, level of service calculations, accident data, and safety issues.
- Ensure that existing road design and safety issues are addressed and that potential conflicts with or impacts to recreational biking are described.
- Ensure that typical potential construction traffic impacts are identified (e.g. typical length of construction period, number of workers per day, number of trucks per day, etc.).
- Assess the Project's long-term operational impacts associated with cannabis cultivation site development (e.g., distribution, transportation, and sale), including changes in levels of service at intersections, as well as transportation safety issues (e.g., access, speeding, equestrian/ pedestrian vehicle conflicts) on County roads, including potential increases in incidents while driving under the influence.
- Evaluate the Project's cumulative effects to traffic and transportation based on regional development trends.
- Identify mitigation measures to address any congestion-related impacts, as well as adverse safety impacts and any neighborhood circulation issues.

Amec Foster Wheeler's Transportation Engineer, Brian Fellows, PE, would oversee this effort with assistance from Taylor Lane, an Environmental Analyst.

Utilities & Service Systems:

Southern California Edison (SCE) and Pacific Gas and Electric (PG&E) provide electricity to the County, Southern California Gas Company (SoCal Gas) provides natural gas, and Marborg Industries provides solid waste hauling services. Sanitation districts providing wastewater management and treatment include the Carpinteria Sanitary District, Goleta Sanitary District, Goleta West Sanitary District, Laguna County Sanitation District, Montecito Sanitary District, and Summerland Sanitary District. Water suppliers include the Santa Barbara County Water Agency, Carpinteria Valley Water District, Goleta Water District, Montecito Water District, Golden State Water Company, La Cumbre Mutual Water Company, and others. The County's domestic water is supplied from groundwater withdrawal, storm runoff collected in reservoir systems (e.g., Lake Cachuma), the State Water Project, recycled water, and desalination planned in the near future. The

Project would increase demand for water and power to support cannabis activities and may generate wastewater requiring treatment and solid waste requiring landfill disposal. While many cultivation sites are anticipated to be rural and served by wells, indoor cultivation is likely to require municipal water sources and use of existing infrastructure. To assess utility issues for the Project, our team would:

- Investigate the energy availability and demand associated with commercial-scale cannabis cultivation and manufacturing, including energy diversity and options for alternative energy sources.
- Consult with water purveyors about potential limits to supply.
- Obtain infrastructure data from the County and service providers including use data and the location of utility lines within the County, connection points into the local systems, pipeline diameter sizes, etc.
- Review and compile information from existing plans and studies, including any recently updated documents and describe existing utility infrastructure and service and any shortfalls or inadequacies in existing infrastructure or services, particularly the adequacy of existing water lines and storm drains serving the area and potential impacts associated with wastewater (e.g., sewer lines or septic systems). Describe the capacity of existing systems that would serve cultivation sites, including water, wastewater, solid waste, and energy systems.
- Investigate whether indoor industrial scale use of hydroponics, fertilizer, and grow medium creates issues for municipal wastewater treatment or solid waste management.
- Identify impacts from cannabis cultivation sites upon the existing utility system and services and operation-related impacts from existing and new cultivation sites related to the increase in demand for utility services and increase in waste associated with cultivation.
- Assess energy impacts consistent with Appendix F of the CEQA Guidelines.
- Describe cumulative impacts associated with proposed projects in the vicinity.
- Identify potential mitigation measures as needed to address impacts.

Amec Foster Wheeler's Utilities Engineer, Ms. Debra McGrew, PE, will oversee this effort, with assistance from Environmental Analyst, Matt Buggert.

V. COST PROPOSAL (SEE VOLUME II)

Amec Foster Wheeler's team has prepared under separate cover a cost proposal and project assumptions to provide a detailed description of the level of effort – by task and within each phase of the Project as described in this document. Please see **Volume II: Cost Proposal** for this portion of our proposal.

VI. TIMELINE

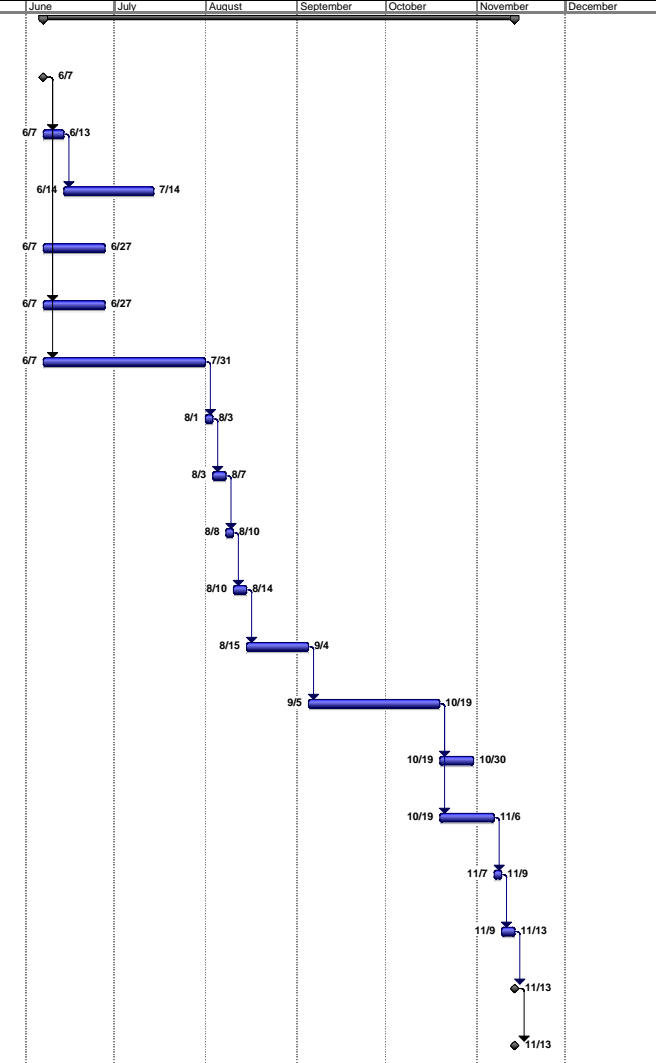
Amec Foster Wheeler has prepared an aggressive EIR schedule to complete the DEIR and FEIR within 7 months from Project kickoff, presumed to occur in early June 2017. Amec Foster Wheeler anticipates completion of Administrative Draft EIR in late July 2017. This would permit completion of the public review Draft EIR by August 2017 and the Proposed Final EIR by November 2017. Consideration of adoption and certification of the DEIR would commence in December 2017 to allow for adoption of the Project in early 2018. This schedule permits time for public and stakeholder responses during a 45-day public comment period on the DEIR. Amec Foster Wheeler's preliminary schedule would deliver the EIR well within the County's desired timeframes for each deliverable and permit flexibility to respond to decision-maker concerns and direction. Amec Foster Wheeler is committed to meet the County's scheduling needs and to work with staff to ensure that these goals are met.

Proposed Schedule to Prepare the Environmental Impact Report for the Cannabis Land Use Ordinance Project



Amec Foster Wheeler Environment & Infrastructure

ID	Task Name	Duration	Start	Finish	May	June	July	August	September	October	November	December
1	Cannabis Land Use Ordinance Project EIR	22.8 wks	Wed 6/7/17	Mon 11/13/17								
2	Kickoff Meeting	0 wks	Wed 6/7/17	Wed 6/7/17								
3	Prepare Notice of Preparation (NOP)	1 wk	Wed 6/7/17	Tue 6/13/17								
4	Scoping Process (30 days), including scoping meeting/workshops	4.5 wks	Wed 6/14/17	Fri 7/14/17								
5	Review Background and Technical Review of Existing Setting	3 wks	Wed 6/7/17	Tue 6/27/17								
6	Establish Baseline Conditions (GIS mapping and database, fieldwork if available)	3 wks	Wed 6/7/17	Tue 6/27/17								
7	Prepare Administrative Draft EIR	7.8 wks	Wed 6/7/17	Mon 7/31/17								
8	County Review of Administrative Draft EIR	0.5 wks	Tue 8/1/17	Thu 8/3/17								
9	Prepare Screencheck Draft EIR	0.5 wks	Thu 8/3/17	Mon 8/7/17								
10	County Review of Screencheck Draft EIR	0.5 wks	Tue 8/8/17	Thu 8/10/17								
11	Prepare and Publish Public Draft EIR	0.5 wks	Thu 8/10/17	Mon 8/14/17								
12	County Counsel review; Prepare NOC/NOA and Distribute Public Draft EIR	3 wks	Tue 8/15/17	Mon 9/4/17								
13	Public Review Period (45 days), including public EIR hearing	6.5 wks	Tue 9/5/17	Thu 10/19/17								
14	Prepare Response to Comments (RTC)	1.5 wks	Thu 10/19/17	Mon 10/30/17								
15	Prepare Administrative Final EIR & Mitigation Monitoring & Reporting Plan (MMRP)	2.5 wks	Thu 10/19/17	Mon 11/6/17								
16	County Review Administrative Final EIR, RTC, MMRP, Findings	0.5 wks	Tue 11/7/17	Thu 11/9/17								
17	Prepare and Publish Final EIR	0.5 wks	Thu 11/9/17	Mon 11/13/17								
18	Prepare Notice of Determination (NOD) and Distribute Final EIR	0 wks	Mon 11/13/17	Mon 11/13/17								
19	Begin County Decision-maker Hearings	0 wks	Mon 11/13/17	Mon 11/13/17								



Assumed Start Date: Wed 6/7/17
Date: Wed 4/19/17

Task Split Progress Milestone Summary Project Summary External Tasks External Milestone Deadline

VII. REFERENCES

The following project references correspond with project examples discussed in this proposal.

Shell Guadalupe Dunes Gravel Remediation In-lieu Fee Project Environmental Impact Report

Matt Young, (Former Project Planner, Hydrologist)

County of Santa Barbara

Public Works, Water Agency

123 E. Anapamu Street

Santa Barbara, CA 93101

(805) 568-3440

mayoung@countyofsb.org

Performance/Completion Dates: 2014-2016

Project Manager: Rita Bright

Cuyama Solar Array Project Environmental Impact Report

Kathy Pfeifer, Senior Planner

County of Santa Barbara

Planning & Development Department

123 E. Anapamu Street

Santa Barbara, CA 93101

(805) 568-2507

kathypm@co.santa-barbara.ca.us

Performance/Completion Dates: 2013-2014

Project Manager: Rita Bright

Downtown Specific Plan &

500 Broadway Mixed Use Development Projects Environmental Impact Reports

Rachel Kwok, Project Manager

Strategic & Transportation Planning

1685 Main Street, Room 212

Santa Monica, CA 90407

(310) 485-8341

rachel.kwok@smgov.net

Performance/Completion Dates: 2013-2015

Deputy Project Manager: Erika Leachman

*Additional references provided above in Section II.B, *Qualifications – Related Project Experience*

VIII. INSURANCE & CONTRACT AGREEMENT TERMS

Amec Foster Wheeler maintains insurance at a level and type that meets the County's minimum insurance requirements, including limits no less than \$1,000,000 per occurrence and \$2,000,000 in the aggregate for general and specified liabilities as identified in the County's Indemnification and Insurance Requirements. Proof of insurance will be provided to the County upon selection for Project contracting. Amec Foster Wheeler acknowledges terms and conditions and confirms the ability to conform to terms and conditions addressed in the County's standard contract, included as Attachment C of the RFP.