



**COUNTY OF SANTA BARBARA
PLANNING AND DEVELOPMENT**

MEMORANDUM

TO: County Planning Commission

FROM: Kathy Pfeifer, Planner
Planning and Development, Development Review Division

DATE: November 12, 2019

RE: Revisions to 18EIR-00000-0001, the proposed Final Supplemental EIR for the Strauss Wind Energy Project (16CUP-00000-00031, 18CDP-00000-00001, 18VAR-00000-00002) to add description and analysis of the impacts associated with recommended Modified Project Layout Alternative (including elimination of WTGs E-7 and E-8) and Alternative Surface Transport Route to the proposed project subsequent to completion of the proposed Final SEIR for the project and prior to decision-maker action (including potential certification of the Final SEIR)

1.0 Background

The Draft Supplemental Environmental Impact Report (Draft SEIR) for the Project was released for public review from April 23, 2019, to June 14, 2019. A public comment hearing was held May 30, 2019, in Lompoc. The Planning & Development Department received oral comments from speakers at the hearing and written comments from public agencies, organizations, members of the public, and the applicant. Chapter 8 of the Final SEIR includes all comments received and staff's responses to them. Revisions to the Draft SEIR did not result in any new significant environmental impacts or any increase in the severity of significant impacts identified in the Draft SEIR. The proposed Final SEIR was released on October 31, 2019.

The November 20, 2019, Planning Commission staff report includes staff's recommendation to conditionally approve two of the alternatives discussed in the SEIR, the Modified Project Layout Alternative (including elimination of WTGs E-7 and E-8 locations) and the Alternative Surface Transport Route. The applicant has accepted the description of the project as presented in recommended Condition 1 as the proposed project for consideration by the County decision makers. This Revision Letter No. 1 provides additional analysis to document that the recommended combination of these two alternatives would not result in any additional significant and unavoidable Class I environmental impacts, and would mostly lessen previously identified Class I or Class II impacts, as described in the Final SEIR. The mitigation measures identified in the Final SEIR apply to this recommended alternative project as well and all mitigation measures identified in the Final SEIR are included as conditions of approval in the

staff recommendation for the combination of the Modified Project Layout Alternative and Alternative Surface Transport Route (see Attachment B, Conditions of Approval, to the Planning Commission staff report).

2.0 Originally Proposed Project Description

The proposed Strauss Wind Energy Project evaluated in the Final SEIR dated October 2019 includes a request for a conditional use permit (CUP), coastal development permit (CDP), and variance for construction and operation of up to 30 wind turbine generators (WTGs), on-site power collection lines, a meteorological tower, two SODAR units, a substation, operations and maintenance (O&M) facility, on-site communications system, 7.3-mile 115-kV transmission line, and switchyard. The project also includes widening or modification of 10.8 miles of existing roads, construction of 8.2 miles of new roads, replacing wires and poles along 0.8 miles of an existing PG&E transmission line and upgrading the PG&E substation. Approximately 149 acres would be permanently disturbed for the project. When complete, the project would be capable of generating up to 102 megawatts (MW) of electrical energy. The project site is identified by the boundaries of Assessor Parcel Numbers 083-100-008, 083-250-011, 083-250-016, 083-250-019, 083-090-001, 083-090-002, 083-090-003, 083-080-004, 083-100-007, 083-100-004, 083-090-004, 093-140-016, 083-060-013, 083-030-031, 083-030-005, 083-030-006, 083-110-012, 083-110-007, 083-110-008, 083-060-017, 083-110-002, and 099-141-034, and is located in western Santa Barbara County, Third and Fourth Supervisorial Districts. The proposed project is described in more detail in Chapter 2 of the Final SEIR.

3.0 Project Description Changes

As indicated in Section 5.6 of the Final SEIR, the alternatives considered in the Final SEIR are not mutually exclusive and can be combined in order to reduce impacts. The Final SEIR determined that the combination of the Modified Project Layout Alternative (Final SEIR Section 5.5.2) and the Alternative Surface Transport Route (Final SEIR Section 5.5.4) would be the most effective in reducing adverse impacts and therefore was identified as the environmentally superior alternative. The combination of these two alternatives is the project recommended for approval.

The Modified Project Layout Alternative includes installation of 29 WTGs, which is one less than the proposed project, and the maximum electrical generating capacity would be approximately 98.14 MW (compared to 102 MW for the proposed project). In total, this alternative would include the construction of twenty-three 3.8-MW WTGs and six 1.79-MW WTGs. It would also include construction of all the other components of the proposed project listed above. This alternative modifies the proposed project by:

- Eliminating WTGs E-7 and E-8 and associated 0.5 mile of new roads;
- Constructing a new 1.79-MW WTG along the access road on the north string between proposed WTGs N-8 and N-9 (the new WTG location is designated as WTG N-10);
- Substituting the proposed project's 1.79-MW WTGs at locations W-7 and N-3 with larger 3.8-MW WTGs; and
- Constructing 0.2 mile of a new access road from the laydown area to WTG E-1 and 0.3 mile of a new access road from WTG E-1 to WTG E-2 to eliminate direct impacts on Coastal Zone resources.

The Alternative Surface Transport Route would further reduce the significant but mitigable impacts associated with traffic disruptions and the temporary infrastructure dismantling in the City of Lompoc. This alternative would alter a portion of the proposed surface transport route for the wind turbine blades and other large turbine components. As discussed in Final SEIR Section 2.6.2, the proposed local route for wind turbine blade transportation begins at I-5 and proceeds westerly along CA-166 to CA-101 South, and then proceeds along Highways CA-135 and CA-1 to Santa Lucia Canyon Road and Ocean Avenue, and then entering City of Lompoc from the west.

This Alternative Surface Transport Route would alter the transportation route to move the majority of the transport outside of the City of Lompoc and reduce the number of turns that are required within the City of Lompoc. The alternate surface transport route would deviate from the proposed transport route at the intersection of CA-1 and Santa Lucia Canyon Road. The blades would then travel south along Santa Lucia Canyon Road, which becomes Floradale Avenue. The blades would proceed south along Floradale Avenue, making an easterly turn at W. Ocean Avenue. The blades would then proceed east along W. Ocean Avenue, entering the City of Lompoc and proceeding to South I Street where the route would turn south for one block before re-connecting with proposed transport route at the intersection of South I Street and Cypress Avenue. This alternative surface transportation route is shown on Final SEIR Figure 5-4. This surface transportation route alternative would require one less turn from CA-1 through to South I street. This route would increase the overall route by about one mile but would reduce the length of transport within the City of Lompoc by approximately 0.75 miles from approximately 2.67 miles to approximately 1.9 miles. Additionally, this route would move one of the required turns outside of the City of Lompoc, as the CA-1 and W. Ocean Avenue turn would now be made outside of the City.

4.0 Environmental Analysis of the Modified Project Layout Alternative

The Final SEIR compares the impacts of the Modified Project Layout Alternative and the Alternative Surface Transport Route to those identified for the proposed project for each issue area and Final SEIR Chapter 5 identifies this alternative as environmentally superior to the proposed project (after the No Project alternative), pursuant to CEQA Guidelines §15126.6(e)(2). The impacts of the Modified Project Layout Alternative and the Alternative Surface Transport Route are discussed below by issue area.

Aesthetics/Visual Resources, Final SEIR Section 4.2. The Modified Project Layout Alternative would result in a slight reduction in project visibility and the associated impacts. While the removal of WTGs E-7 and E-8 would reduce by two the number of visible WTGs from SR-1 (KOP 1) and La Purisima Mission (KOP 8), there would be no change in the impact from Jalama Beach County Park (KOP 4). The elimination of E-7 and E-8 combined with the addition of N-10 would result in a net reduction of one visible WTG when viewed from the northern portion of Lompoc Valley including Harris Grade Road (KOP 9) and SR-1 (KOP 10). From both of these locations, the change in WTG size for N-3 and N-7 would result in no readily discernible difference. From some locations in the northern portion of the City of Lompoc, an additional WTG (N-10) would be visible under this alternative while the WTG change at N-7 would result in no readily discernible difference. Overall, this alternative would result in a slight reduction in project visibility and the associated visual impact but not to the degree that any of the visual impact significance findings would change. The Alternative Surface Transport Route

would neither introduce a new significant visual impact, nor eliminate or reduce significant and unavoidable impacts that would occur with implementation of the proposed project.

Visual resource Impacts VIS-1, VIS-2, VIS-5, VIS-7, and VIS-8 would remain significant (Class I), Impact VIS-6 would remain Class II, other visual impacts would remain Class III under this alternative and the same mitigation measures would apply. As for the proposed project, visual impacts would not be cumulatively considerable, with the exception of Impact VIS-5 where the transmission line and switchyard would be in the same visual field as the cumulative projects.

Agricultural Resources, Final SEIR Section 4.3. The Modified Project Layout Alternative would involve construction of a new WTG (N-10) in an area of the project site that is currently developed for dryland farming, which would slightly increase permanent disturbance to active agriculture. As WTG N-10 would only be located on designated Grazing Land, this alternative would have no effect on Important Farmland. Impacts to agricultural resources would be less than one acre greater than the proposed project due to the added disturbance to an actively farmed area, but there would be no change in the severity of impact compared to the proposed project. Furthermore, the proposed location of the WTGs, substation, and access roads relative to existing agricultural activities would not change. Impacts would remain less than significant.

The Alternative Surface Transport Route would pass by areas of Prime Farmland for approximately 3.4 miles. Prime Farmland has been designated by the California Department of Conservation both east and west of Floradale Avenue as it extends south of the Federal Correctional Institution towards W. Ocean Avenue. Prime Farmland has also been designated north and south of W. Ocean Avenue until it intersects with V Street, with the exception of a 0.25-mile stretch of W. Ocean Avenue between North Z Street and V Street that borders residential development to the north. This alternative does not require the widening of existing roadways into adjacent Farmland, and no new impacts to agricultural resources would occur. Impacts to agriculture resources under this alternative would not differ from the proposed project and would remain less than significant, Class III. Similar to the proposed project, the Modified SWEP's contribution to cumulative impacts to agricultural resources would not be significant.

Air Quality, Final SEIR Section 4.4. The Modified Project Layout Alternative would reduce the short-term construction and long-term operation air pollutant emissions in comparison with the proposed project. The construction emission reductions would occur due to one fewer WTG being constructed, a reduction in overall grading requirements, and a substantial reduction in tree removal. However, these construction emissions reductions are not substantial enough to change the project's unmitigated and mitigated impact significance levels, nor affect the recommended air quality mitigation measures. The operation emissions, which would be slightly reduced due to 0.3 mile less of unpaved road and one fewer WTG to maintain, would remain less than significant. Overall, this alternative would marginally reduce the adverse air quality impacts in comparison with the proposed project.

The air quality impacts for Alternative Surface Transport Route would not differ substantially from the proposed project. The small increase in the overall blade transportation route by about one mile would slightly increase the construction emissions associated with transportation miles. However, the emissions increase would be minor in the context of the proposed project's total construction emissions increases, and the same mitigation measures would apply. This alternative route would, to a small extent, reduce the short-term localized construction emissions impacts of blade transportation, while moving the location of these impacts, based on the

reduction of the route length through populated areas within Lompoc. Air quality Impact AQ-1 would remain less than significant after mitigation (Class II) and Impact AQ-2 would not be significant (Class III). Similar to the proposed project, the Modified SWEP's contribution to cumulative air quality impacts would not be significant.

Biological Resources, Final SEIR Section 4.5. The Modified Project Layout Alternative would reduce impacts to oaks by approximately 63 percent by eliminating WTGs E-7 and E-8 and the access roads to those WTGs. The proposed project would remove approximately 607 oak trees; with this alternative, approximately 225 oak trees would be removed, saving 382 oak trees. One fewer WTG would marginally decrease potential for bird and bat strikes with the WTGs; however, this reduction is expected to be minor. Larger WTGs at W-7 and N-3 would have a negligible effect on bird and bat strike potential, as the difference in height is only 65 feet. The realigned access roads to WTG E-2 and E-3 would impact an additional 1.1 acres of native grassland, as well as have an additional impact of 3.9 acres to Gaviota tarplant. The realigned access road to WTG E-1 would affect an additional 1.8 acres of native grassland and result in an additional impact of 2.9 acres to a mapped population of Gaviota tarplant. Direct impacts in the Coastal Zone would be eliminated with the alternative. Overall, this alternative would substantially reduce impacts to oaks, would result in a minor increase in impacts to Gaviota tarplant, and would not appreciably change the severity of impacts to other biological resources. Nonetheless, because oak woodlands are sensitive and take decades to recover even when restoration is successful, the impacts to approximately 225 oaks (Impact Bio-2a) under this alternative would remain significant and unavoidable.

The Alternative Surface Transport Route would not introduce a new significant biological resource impact, nor eliminate or reduce significant and unavoidable impacts that would occur with implementation of the proposed project. Class I (BIO-2a and BIO-10) and Class II impacts (BIO-1a and 1b, BIO-3, BIO-5a and 5b, BIO-6, BIO-7, BIO-8, BIO-9, BIO-11, and BIO-14) to biological resources would remain significant under this alternative and the same mitigation measures would still apply. As for the proposed project, the Modified SWEP's contribution to cumulative impacts would be significant for loss of native vegetation and wildlife habitat, loss of woodland and forest resources, habitat for common and special-status plant and wildlife species, including Gaviota tarplant and nesting birds and the project's contribution to cumulative impacts due to avian and bat collisions or displacement related to the WTGs, transmission lines and meteorological tower would not be cumulatively considerable.

Archaeological and Tribal Cultural Resources, Final SEIR Section 4.6. No cultural or tribal resources are located at the sites of WTGs E-7 and E-8. Therefore, the removal of these two WTGs would not eliminate any impacts on archaeological or Tribal Cultural Resources associated with the proposed project. The addition of WTG N-10 would increase the impacts to the western one-fifth of resource SBA-3847 by adding a larger turbine pad with its associated grading. The turbine proposed at N-10 would also be visible from the locations of two Tribal Cultural Resource sites where Tribal cultural practices occur periodically. Increasing the size of the turbines at WTGs W-7 and N-3 could increase grading and may result in increased impacts on sites SBA-3992 and SBA-3840, respectively. The new access road to WTG E-1 would increase disturbance at cultural resource sites SBA-2757 and SBA-3848, and the new access road to WTG E-2 may result in additional impacts to sites SBA-3848, SBA-2754, and SBA-2757, the latter being eligible for the California Register of Historical Resources. The additional impacts under this alternative would require implementation of mitigation measures identified in Final

SEIR Section 4.6.4 to reduce impacts. Overall, while some impacts to specific archeological sites may increase, the significance of impacts under this alternative would remain the same as the proposed project, Class II (Impacts CULT-1, CULT-2, and CULT-3) and Class III (Impact CULT-4).

The Alternative Surface Transport Route would not introduce a new significant impact to cultural and tribal resources, nor eliminate or reduce significant impacts that would occur with implementation of the proposed project. Impacts to cultural and tribal resources would be the same as for the proposed project and the mitigation measures identified in Final SEIR Section 4.6.4 would be required to reduce impacts.

Similar to the proposed project, cumulative impacts to cultural resources would be less than significant.

Energy, Final SEIR Section 4.7. Under the Modified Project Layout Alternative, the adverse impacts to energy would be identical to the proposed Project while the beneficial effects would be slightly reduced. Given that the design and construction of this alternative would be very similar to the proposed project, with the exception of the installation of one less WTG, this alternative would consume nearly the same quantity of fossil fuels during construction and would require identical modifications to PG&E's electrical system. The potential generation capacity under this alternative (98.14 MW) would be approximately 4 MWs less beneficial for federal and State renewable energy goals than under the proposed project (102 MW). Similar to the proposed project, this alternative would continue to support renewable energy goals and would continue to have a less-than-significant impact on nonrenewable energy resources as well as on the existing electrical system.

There would be no change to energy-related impacts with the Alternative Surface Transport Route. The design and construction of this alternative would not substantially change from the proposed project, as this alternative would only differ in the proposed transport route through the City of Lompoc. While an alternative route may require a slight increase in fossil fuel consumption during transport due to a transportation route that is about one mile longer, the total fossil fuel use during construction would be comparable to the proposed project. Furthermore, potential generation capacity would be identical to the proposed project and this alternative would continue to support renewable energy goals. Both the transportation alternative and the proposed project would have a less-than-significant impact on nonrenewable energy resources as well as on the existing electrical system. As for the proposed project, cumulative energy impacts associated with the Modified SWEP would not be significant.

Fire Hazards & Emergency Services, Final SEIR Section 4.8. Under this alternative, the elimination of two WTGs along the eastern string and the addition of one WTG along the northern string would not alter the types or severity of impacts to emergency service response times or to anticipated fire risk identified for the proposed project. Impacts associated with fire hazards and emergency services would remain significant but could be reduced to a less-than-significant level (Class II) with implementation of the mitigation measures identified in Final SEIR Section 4.8.4.

The Alternative Surface Transport Route would not introduce a new fire hazard compared to the proposed project, nor would it create a new conflict with an adopted emergency evacuation/response plan. Impacts to fire hazards and emergency services would remain

significant but could be reduced to a less-than-significant level with implementation of the mitigation measures identified in Final SEIR Section 4.8.4.

With implementation of required mitigation measures, the Modified SWEP's contribution to cumulative impacts due to increased wildland fire risk during construction and operations, increased demand for fire protection and emergency medical services, and interference with controlled burns and emergency evacuations would not be cumulatively considerable.

Geology and Soils, Final SEIR Section 4.9. The elimination of two WTGs along the eastern string would not avoid potential impacts associated with geology or soils that may occur from construction and operation of the proposed project. The addition of WTG N-10 would not create a new impact that has not already been discussed for the proposed project. Similarly, the construction of new access roads under this alternative would not result in new or more severe impacts to soils or geology compared to the proposed project. Earth movement in the Coastal Zone would be eliminated with the alternative. The total amount of graded area would be reduced by about 1.3 acres compared to the proposed project. Geology- and soils-related impacts under this alternative would be basically the same as the proposed project (Impacts GEO-2, GEO-3, GEO-4, GEO-5 and GEO-7) and would require the implementation of mitigation measures to reduce impacts to a less-than-significant level. Impacts GEO-1 (fault rupture) and Impact GEO-6 sewage effluent disposal) would remain Class III.

The Alternative Surface Transport Route would not introduce a new significant impact to geology and soils, nor eliminate or reduce significant impacts that would occur with implementation of the proposed project. Impacts to geology and soils would remain less than significant with implementation of the mitigation measures identified in Final SEIR Section 4.9.4.

Similar to the proposed project, cumulative impacts would be less than significant for the Modified SWEP.

Greenhouse Gas Emissions, Final SEIR Section 4.10. While there may be reductions in GHG emissions from the construction and operation of this alternative, the primary factor in the long-term GHG emissions reduction is the total electrical generating capacity of the project. Given that the proposed project is marginally larger than this alternative in generating capacity (102 MW compared to 98.14 MW), the beneficial GHG emissions effects, as well as the local and State GHG emissions regulations and policy conformance, of this alternative would be marginally less than under the proposed project (approximately 4 MW).

The total electrical generating capacity of the project would not be affected by implementation of the Alternative Surface Transport Route. Likewise, there would be no change in either the beneficial GHG emissions effects or the local and state GHG emissions regulations and policy conformance under this alternative as compared to the proposed project. There would be a minor increase to the construction GHG emissions due to the slightly longer blade transportation route, but this increase is minimal in comparison to the beneficial GHG emissions impacts of the proposed project. As for the proposed project, the Final SEIR GHG analysis addresses global cumulative impacts.

Hazards and Hazardous Materials, Final SEIR Section 4.11. The elimination of two WTGs along the eastern string would not avoid potential hazard-related impacts to the public from construction and operation of the proposed project. The location of alternative WTG N-10 would

be over 3,000 feet from the nearest participating or nonparticipating residence and, therefore, would not create a new impact that has not already been discussed for the proposed project. Similarly, the new access roads to WTGs E-1 and E-2 associated with this alternative would not result in new or greater hazards than the proposed project. All hazard-related impacts under this alternative would be identical to the proposed project. Both project-specific and cumulative impacts associated with blade icing and ice throw, blade throw, tower failure, EMF exposure, worker safety, and release of hazardous materials would remain less than significant (Class III).

The Alternative Surface Transport Route would not create a new hazard-related impact that has not already been discussed for the proposed project, nor would the alternative avoid any of the potential impacts that would occur with implementation of the proposed project. Impacts associated with blade icing and ice throw, blade throw, tower failure, EMF exposure, worker safety, and release of hazardous materials would remain less than significant.

Hydrology and Water Quality, Final SEIR Section 4.12. The elimination of two WTGs along the eastern string would not avoid potential impacts to hydrology and water quality that would occur from construction and operation of these WTGs. Further, the addition of WTG N-10 would not create a new impact that has not already been discussed for the proposed project. All hydrology and water quality-related impacts under this alternative would be identical to those for the proposed project. Impacts associated with erosion/sedimentation (Impact WAT-1), pollutant discharge (Impact WAT-2), and stormwater runoff (Impact WAT-3) would remain less than significant (Class III), while impacts associated with groundwater depletion (Impact WAT-4) and riparian vegetation removal (Impact WAT-5) would remain significant but could be reduced to less-than-significant levels with implementation of the mitigation measures identified in Final SEIR Section 4.12.4.

The Alternative Surface Transport Route would not introduce a new significant impact to hydrology and water quality, nor eliminate or reduce significant impacts that would occur with implementation of the proposed project. Impacts to hydrology and water quality would remain less than significant with implementation of the mitigation measures identified in Final SEIR Section 4.12.4.

Similar to the proposed project, the Modified SWEP's contribution to cumulative hydrology and water quality impacts would not be significant.

Land Use and Planning, Final SEIR Section 4.13. Construction and operation of the proposed project's eastern WTG string, including WTGs E-7 and E-8, would be supported by access roads and grading activities that extend into the Coastal Zone. The Modified Project Layout Alternative would eliminate all construction and grading within the Coastal Zone. This alternative would not be subject to the requirements of the County's Coastal Land Use Plan and Coastal Zoning Ordinance but would be subject to the requirements of the Comprehensive Plan and the Land Use and Development Code.

This Modified Project Layout Alternative would result in substantially reduced impacts to trees (including coast live oaks) than the proposed project, in both the Coastal Zone and Inland areas. This alternative would reduce the number of trees lost from approximately 607 to 225 and eliminate altogether the loss of 81 trees in the Coastal Zone. Whereas the proposed project was found to have a Class I significant impact due to its potential inconsistency with County policies and ordinances concerning tree protection, this alternative would reduce that Class I impact to a Class II impact and, with mitigation, would be consistent with County policies and ordinances

concerning tree protection. This alternative would also be consistent with other County plans, policies, and ordinances. Quality of life impacts related to traffic and noise (Impacts LU-4, LU-5a and LU-5b) during project construction and operation would not be significant with implementation of the mitigation measures (Class II) identified in Final SEIR Section 4.13.4. Impacts LU-1 (visual impact development standards), LU-2 (FAA air navigation requirements), and LU-3 (VAFB operations compatibility) would remain less than significant (Class III).

With the Alternative Surface Transport Route, increased noise from transport vehicles would shift west of CA-1 and would primarily affect communities along Floradale Avenue and W. Ocean Avenue (mainly agricultural/open space land with a few residences). While the specific communities affected by transport noise would slightly vary, this alternative would not introduce a new significant impact nor eliminate or reduce significant impacts that would occur under the proposed project.

All land use impacts described in Final SEIR Section 4.13.4 would remain the same except that Land Use Impact 1b (Tree Protection) would be reduced from a Class I to Class II. As for the proposed project, cumulative land use and planning impacts would not be significant.

Noise, Final SEIR Section 4.14. The elimination of two WTGs along the eastern string would not avoid potential noise impacts to residences from construction and operation of the proposed project. The location of alternative WTG N-10 would be over 3,000 feet from the nearest participating or nonparticipating residence and, therefore, would not create a new impact that has not already been discussed for the proposed project. All noise-related impacts under this alternative would be identical to the proposed project. Impacts associated with temporary construction noise (Impact NOI-1) and long-term operational noise (Impact NOI-2) would remain Class II, significant but could be reduced to a less-than-significant level with implementation of the mitigation measures identified in Final SEIR Section 4.14.4.

The Alternative Surface Transport Route would not introduce a new significant noise impact, nor eliminate or reduce significant impacts that would occur with implementation of the proposed project. Receptors in the City of Lompoc that would experience increased construction traffic noise under the proposed project would have reduced impacts under this alternative, because the transport route would avoid off-site locations north of W. Ocean Avenue. Impacts to residences and other receptors in the City of Lompoc south of W. Ocean Avenue would not change and would remain less than significant with implementation of the mitigation measures identified in Final SEIR Section 4.14.4.

Similar to the proposed project, the Modified SWEP's contribution to noise impacts would not be cumulatively considerable.

Paleontological Resources, Final SEIR Section 4.15. Impacts to paleontological resources under this alternative would be identical to the proposed project (Impacts PALEO-1 and Paleo-2; Class II). The elimination of two WTGs along the eastern string would not avoid impacts to High Potential Rock Units occurring within the project area, as shown in Figure 4.15-1 and Table 4.15-1. Further, the addition of WTG N-10 and the new access roads to WTGs E-1 and E-2 would not create a new impact that has not already been discussed for the proposed Project. Impacts during construction and operation would remain significant but could be reduced to a less-than-significant level with implementation of the mitigation measures identified in Final SEIR Section 4.15.4.

The Alternative Surface Transport Route would not introduce a new significant impact to paleontological resources, nor eliminate or reduce significant impacts that would occur with implementation of the proposed project. Impacts to paleontological resources would remain less than significant with implementation of the mitigation measures identified in Final SEIR Section 4.15.4.

Similar to the proposed project, the Modified SWEP's contribution to impacts to paleontological resources would not be cumulatively considerable.

Recreation, Final SEIR Section 4.16. Impact REC-1 (loss of recreational resources) under this alternative would be identical to the proposed project (Class II). The elimination of WTGs E-7 and E-8, and the addition of WTG N-10, would not change the temporary or permanent impacts to recreational groups who use the project area.

Impacts to recreational resources under the Alternative Surface Transport Route would be identical to the proposed project. The alternative transportation route would not change the temporary or permanent impacts to recreational groups who use the project area. Impacts would remain significant but mitigable with implementation of the mitigation measures identified in Final SEIR Section 4.16.4.

Similar to the proposed project, the Modified SWEP's contribution to impacts to recreational resources would not be cumulatively considerable.

Transportation and Traffic, Final SEIR Section 4.17. Impacts to transportation and traffic under this alternative would not substantially differ from the proposed project. The elimination of WTGs E-7 and E-8 and the addition of WTG N-10 would slightly reduce construction traffic levels due to the installation of one less WTG, which would not change LOS nor substantially alter the potential for safety concerns along roadways, road blockages and traffic delays, or roadway damage (Impacts TC-1, TC-2, TC-4, and TC-5). Construction impacts would remain significant but could be reduced to a less-than-significant level with implementation of the mitigation measures identified in Final SEIR Section 4.17.4.

The Alternative Surface Transport Route would not introduce a new significant transportation/traffic impact, nor eliminate or reduce significant and unavoidable impacts that would occur with implementation of the proposed project. However, it would reduce the need for temporary removal of public infrastructure along streets in the City of Lompoc and reduce the short-term disruptions associated with blade transport through the City described in Impacts USS-4 (public infrastructure), TC-2, and TC-4. The alternative would transfer the impacts of oversized truck movements to different roadways and transfer one of the critical turning locations from the W. Ocean Avenue/H Street intersection to the W. Ocean Avenue/Floradale Avenue intersection. This shift would result in a reduction in impact severity because the turning activities would be transferred from an intersection in the Lompoc central business district to an intersection within a largely residential area; however, one turn in the Lompoc central business district would still be required (at Ocean Avenue/I Street). The overall change in impacts would be relatively small as both the proposed project and the Alternative Surface Transport Route would both result in significant but mitigable transportation/traffic impacts.

Similar to the proposed project, the Modified SWEP's contribution to impacts to transportation infrastructure and traffic would be temporarily significant and mitigable during construction and would not be cumulatively significant during operations.

Utilities and Service Systems, Final SEIR Section 4.18. Impacts to utilities and service systems under this alternative would be very similar to the proposed project. The elimination of WTGs E-7 and E-8 would not substantially reduce the total amount of solid waste generated during construction (Impact USS-1), and the siting of a new WTG along the northern string would not create a new impact to existing utilities (Impacts USS-2, USS-3, and USS-4). Construction impacts would remain significant but would be reduced to a less-than-significant level (Class II) with implementation of the mitigation measures identified in Final SEIR Section 4.18.4.

This Alternative Surface Transport Route would not introduce a new significant impact to utilities and service systems, nor would it eliminate or reduce any significant impacts associated with the proposed project, but it would reduce the need to temporarily remove some infrastructure (e.g., light poles, signs, traffic signals) in the City of Lompoc described in Impact USS-4. Impacts to utilities and service systems would remain less than significant with implementation of the mitigation measures identified in Final SEIR Section 4.18.4.

As for the proposed project, the Modified SWEP would generate minor amounts of waste during operations and implementation of mitigation measure USS-1 (Source Reduction and Solid Waste Management Plan) would ensure Project operations do not generate solid waste quantities in excess of the County's 40 tons/per year threshold for long-term waste generation. Therefore, the Modified SWEP's contribution to cumulative utility and service systems impacts would not be significant.

Policy Consistency

The Final SEIR includes an evaluation of the proposed project's consistency with applicable policies of the Santa Barbara County Comprehensive Plan, Coastal Land Use Plan, and Coastal Zoning Ordinance. That evaluation concluded that the proposed project would be inconsistent with the following identified policies related to oak tree preservation:

- Santa Barbara County Comprehensive Plan, Conservation Element, Oak Tree Protection Supplement of the Conservation Element, Oak Tree Protection Policy 1;
- Santa Barbara County Comprehensive Plan, Development Standards for Development, Development Standard 1: Protection of all species of mature oak trees;
- Santa Barbara County Comprehensive Plan, Land Use Element, Hillside and Watershed Protection Policies, Policy 2;
- Santa Barbara County Coastal Land Use Plan, Hillside and Watershed Protection, Policy 3-14;
- Santa Barbara County Coastal Land Use Plan, Environmentally Sensitive Habitat Areas, Policy 9-35;
- Santa Barbara County Article II Coastal Zoning Ordinance, Section 35-97.18 Development Standards for Native Plant Community Habitats; and
- Santa Barbara County Article II Coastal Zoning Ordinance, Section 35-140. Tree Removal.

The Final SEIR indicates that the Modified Project Layout Alternative would substantially reduce impacts to oak trees. Implementation of this alternative would bring the project into compliance with these policies because there would be no tree removal in the Coastal Zone. It would also be consistent with the Oak Tree Protection Supplement and the Land Use Element,

notwithstanding that some 225 trees would be removed for transmission line construction and San Miguelito Road widening. The consistency determination can be made, because (with the mitigation measures described in Section 4.5.4.2), impacts to trees, and oak trees in particular, would be avoided to the maximum extent feasible.

The Final SEIR analysis concluded that Strauss Wind's proposed project would be consistent with each of the other applicable policies identified in the Final SEIR.

The policy consistency analysis in Table 6, Section 6.2 of the November 20, 2019, Planning Commission staff report accurately reflects the Modified Project Layout Alternative and Alternative Surface Transport Route project.

Other CEQA-Mandated Sections

The discussions of these mandated topics for the proposed project in the Final SEIR apply to the Modified Project Layout Alternative and Alternative Surface Transport Route as well.

Mitigation Monitoring Program

The mitigation measures and mitigation monitoring program listed and discussed in Chapter 9 of the Final SEIR also apply to the Modified Project Layout Alternative and Alternative Surface Transport Route.

CONCLUSION: Based on the foregoing, impacts resulting from implementation of the Modified Project Layout Alternative and Alternative Surface Transport Route project would result in a reduction in the significance of impacts on oak trees (see Impacts LU-1b and BIO-2a) described in the analyses in the Final SEIR, and would reduce impacts associated with traffic safety and traffic delays in the City of Lompoc (see Impacts TC-2, TC-4, and USS-4). Other impacts would also be reduced, such as impacts on visual resources (due to visibility of one less WTG) and air quality (due to reduced construction emissions), although the significance determinations for these impacts would remain unchanged. Direct impacts in the coastal zone would be avoided. Overall, the Modified Project Layout Alternative and Alternative Surface Transport Route project reduces 18 impacts compared to the proposed project, including impacts associated with aesthetics, air quality, biological resources, land use, and vegetative waste disposal.

A few impacts would be slightly increased with the Modified Project Layout Alternative and Alternative Surface Transport Route project, but not enough to change the significance of these impacts or require additional mitigation. Increased impacts include a small increase in disturbance of actively farmed area, a small increase in impacts on Gaviota tarplant and native grassland, and slightly increased potential for disturbance of cultural resource sites near WTGs N-10, W-7, and N-3. Also, this project would slightly decrease the potential to offset GHG emissions due to its reduced generating capacity compared to the proposed project.

Incorporation of this Revision Letter #1 dated November 12, 2019, into the Final SEIR fulfills the environmental review requirements for the Modified Project Layout Alternative and Alternative Surface Transport Route and the information contained herein does not require recirculation of the project SEIR pursuant to CEQA Guidelines Section 15088.5.