

Comment Set ACC



3 September 2007

**RECEIVED
COUNTY OF SANTA BARBARA**

SEP 03 2007

PLANNING AND DEVELOPMENT
DEPARTMENT - ENERGY DIVISION

John Day, PhD
Santa Barbara County Planning and Development
Energy Division
123 E. Anapamu St.
Santa Barbara, CA 93101

Re: Applicant comments on the County EIR No. 06EIR-00000-00004 (State Clearinghouse No. 2006071008), Public Draft Environmental Impact Report on the Lompoc Wind Energy Project

Dr. Day;

Pacific Renewable Energy Generation LLC, a subsidiary of Acciona Wind Energy USA LLC, is pleased to submit comments on the Draft Environmental Impact Report for the Lompoc Wind Energy Project, prepared by the County of Santa Barbara.

As a world leader in the field of development, design, and manufacturing of wind energy technology, Acciona is pleased to bring our global experience and successes to bear on California's need for cleaner energy. In 2006, Acciona Energy produced 6,128 GWh (million kilowatt-hours) of electricity from renewable energy sources of which 93% were generated from wind power. Nearly six million tons of CO₂ emissions were avoided by this clean power generation. This represents a cleaning effect on the atmosphere equivalent to 300 million trees through the photosynthesis process.

Over the last 5 years, wind technology has improved dramatically which has resulted in lower noise levels, fewer avian fatalities, and less visual impacts. Acciona designs and builds our own turbines. Our new West Branch manufacturing plant in Iowa will be providing the Lompoc Wind Energy Project with the most technologically advanced and environmentally friendly turbines in the industry. With current technology we can replace approximately 20 of the turbines constructed in 1980 with only one constructed today. We can produce more electricity with less turbines resulting in a project that produces usable amounts of electricity with minimal environmental and social impacts.

Acciona staff is aware of the issues and impacts of developing wind energy facilities. It is without argument that all development projects will have some impact. As stated in the Draft Environmental Impact Report, this project will have several *Class I impacts* based on the County's current levels of significance. However, impacts from the Lompoc Wind Energy Project will have fewer and, orders of magnitude, less impacts than other conventional sources of energy generation. For each Megawatt of wind energy that is produced by this

Comment Set ACC, continued

Acciona Energy North America Corporation

September 3, 2007

project, 2,000 tons of carbon dioxide greenhouse gases, 10 tons of sulfur dioxide, and 6 tons of nitrogen dioxide are avoided.

Acciona applauds your efforts to move forward on sustainable clean energy sources and looks forward to assisting the County of Santa Barbara in meeting future energy needs.

Sincerely yours,



K. Harley McDonald
Project Manager

Comment Set ACC, continued

Acadna Energy North America Corporation

September 3, 2007

EIR SECTION	COMMENT
Executive Summary	<p>ES-1, Par 1 - The Project is in the Third Supervisory District, not the Fourth.</p> <p>ES-3, Par 2, Item 2 - Please add the following to the end of this Item. "However, Applicant Proposed Alternative Powerline Route Mitigation Measure ALT-VIS-1 would reduce this impact to a less than significant level of impact".</p> <p>ES-4&5, Environmentally Superior Alternative - The Applicant believes that the Environmentally Superior Alternative should be the full development Project as submitted. This Alternative allows for the construction of up to 120 megawatts of Renewable Energy which is critically needed to help reduce green house gases in California. The Incremental Increase in the levels of impact from the two Class 1 Impacts associated with the project in the areas of Visual and Biology between the proposed Environmentally Superior Alternative and the Full Project Development Alternative are more than offset by the increased supply of alternative renewable energy available under the Full Project Development Alternative. Additionally, adoption by the County of the proposed Environmentally Superior Alternative, most likely will result in making the Project uneconomical to develop because the best wind resources are located in the areas that the proposed Environmentally Superior Alternative proposes to remove from the Project.</p> <p>ES-6-35 Impact Summary Table - The Applicant will comment on these impacts in the appropriate Sections of the Draft EIR.</p>
1.0 Introduction	<p>1-3, Par1, Item 5 - Please insert the following after Santa Barbara County ", school districts, and special districts, including the Lompoc Hospital with additional tax revenues'.</p>
2.0 Project Description	<p>2-3, Table 2-1 - This Table needs to be updated as one of the parcels (083-090-004) has been sold. The new owners are Joseph A. Signorelli, Jr. and Gus Tom Signorelli. Remove this parcel from the Peter and Eteivina Signorelli Family Trust column and create a new ownership line for the transferred parcel.</p> <p>Par 1 - The first sentence of this paragraph should be re-written as follows to be correct. "PG&E proposes to reconductor (replace wires and possibly poles) along the Celite 115 kV power line for a distance of 2,000 feet running north from the southern terminus of the existing Divide-Cabrillo Number 2 115 kV line located on a pole adjacent to the Cabrillo Substation on San Julian Street. (Figure 2-3)."</p> <p>Sec 2.3.1, Par 4 - The generation voltage is stated at 6kv to 12kv. It should be 600 volts to 12 kv, or 600 volts to 12,000 volts.</p> <p>Sec 2.3.2, Par 1 - This paragraph states that 40 ft roads would be restored to 24 ft. It is more likely the road would be restored back to 16-18 ft</p> <p>Sec 2.3.2, Par 5 - This paragraph states that signs would be placed on roads as directed by County. I believe this should read that the County would direct placement of signs on PUBLIC roads. Site roads are on private property and the Applicant will place signs as required by site safety plan and EIR requirements.</p> <p>2-11, Par 4 - This paragraph should be changed to read as follows: "For security reasons the Applicant may request that the County close either or both of Sudden Road and Miguelito Canyon Road beyond their intersection to the public. These roads would continue to provide access to VAFB and the private ranches that abut it. The ranches that abut these roads are project participants. This action is considered to be an administrative process and would occur outside of the scope of this environmental review.</p> <p>2-11, Par 6 - Please strike the last part of sentence two: "and in all cases be constructed within the WTG corridors as shown on Figure 2-2". Not all of the access roads are within corridors and there will be power lines constructed along and under these roads that are outside of corridors.</p> <p>2-11, Par 2, Sentence 3 - This sentence needs to be re-written as follows. "Water for the O&M facility</p>

- ACC-1
- ACC-2
- ACC-3
- ACC-4
- ACC-5
- ACC-6
- ACC-7
- ACC-8
- ACC-9
- ACC-10
- ACC-11
- ACC-12
- ACC-13

Comment Set ACC, continued

Acclona Energy North America Corporation

September 3, 2007

	<p>operations will be obtained from a new shallow well on the property or from an existing spring on the property. (Trucking of potable water is no longer proposed per discussions with Santa Barbara County Environmental Health Department.)"</p> <p>2-16, Table 2-3 - This Table needs to be revised as the Applicant intends to request that the proposed work schedule include working on some Saturday's and some State holidays in order to meet the tight construction time frame in order to be operational by October of 2008.</p> <p>2-19, Table 2-5 - This Table needs to be revised as follows and reference to Total Disturbance Areas through out the document changed accordingly. The 2.95 acres of disturbance shown for the Staging area on the Larsen property should be 0 as the Larsen site is located on an already disturbed gravel pad that is part of an old rock quarry.</p> <p>[REDACTED]</p>
<p>3.0 Environmental Setting, Impacts, and Mitigation</p>	<p>[REDACTED]</p> <p>3.2-3, Par 4, last sentence - Please add after Tranquillon Mountain the following: "and Sudden Peaks the most pronounced peaks in the area". (Sudden Peak actually has more tracking facilities on it than does Tranquillon Mountain.</p> <p>3.2-3, Par 5 - The reference to oak woodland should be eliminated as there are no oak woodlands in the Project development area. There is one located on the eastern side of the Joe Signorelli property, but it is in the Coastal Zone and is not proposed to be in developed area.</p> <p>3.2-3, Par 2, Jalama Coast and Vandenberg Air Force Base - Please add at the end of this paragraph the following: "There is no public access west of Jalama Beach, thus visual impacts would only be to occasional boaters. This area also has limited pleasure boating activity due to the treacherous waters offshore."</p> <p>3.2-3, Par 1, last sentence - This sentence is incorrect in that there is lighting along the ridges at Sudden Peak, at the radar telemetry site adjacent to the project on the north, and at the numerous VAFB facility locations to the west of the project including the very large launch complexes. All of this gives the viewer the feeling of being in a developed area at night.</p> <p>[REDACTED]</p> <p>3.2-8, Par 1 - At the end of the first sentence, please add the following: "except that the individual project components will not be visible since this area is over 20 miles from the site." Also other statements in this paragraph are misleading. Such as the ocean is two miles away at the closest spot. While this is technically correct this is on VAFB and there is no public access, and boating north of Pt. Conception is very dangerous. Thus visual impacts will be minimal in this area. Also referring to visual impacts to the City of Santa Maria is disingenuous at best. Santa Maria is over 20 miles away with intervening topography.</p> <p>3.2-13, Par 6, last sentence - Please delete the reference to the power line crossing SR-1 at the southern entrance to the City, since there is already a 115 kV line crossing at the identical location or explain that the existing crossing will only be reconducted.</p> <p>3.2-17, Table 3.2-2, Summary of Visual Impacts - Figure 4 Jalama Beach.</p> <p>[REDACTED]</p> <p>The project area that is visible from Jalama Beach takes up only 23 degrees of the 360 degree view shed from Jalama Beach, and most of the turbines are partially blocked by the intervening ridges. Also the predominant view at Jalama Beach is outward toward the Ocean. Additionally because of the distance 4.5 to 5.2 miles the scale of the turbines is reduced. Please see the analysis under KOP 6 which states that at 5.5 miles "the turbines would be visible. They would be proportionally so small that they would not impair views, significantly silhouette the skyline, or provide contrast to the surrounding landscape". This location was classified as a low impact severity.</p> <p>3.2-17, Par 1 - This paragraph discusses the impacts of the power line on SR-1. It should reference somewhere in the paragraph that the Applicant has proposed an alternative that would reduce impacts to less than significant. Otherwise, the reader is left with the impression that impacts will remain</p>

ACC-13, Cont.

ACC-14

ACC-15

ACC-16

ACC-17

ACC-18

ACC-19

ACC-20

ACC-21

ACC-22

ACC-23

ACC-24

ACC-25

ACC-26

Comment Set ACC, continued

Academa Energy North America Corporation


September 3, 2007

<p>Significant Class 1 Impacts. Not every reader will work their way back to the Alternatives section of the Draft EIR.</p>	<p>ACC-26, Cont.</p>
<p>3.2-17, KOP 4 Jalama County Park - There are several problems with this discussion. First the visible project is 4.5 to 5.2 miles west of the park. The park does not face the Channel Islands. The Channel Islands are mostly south-east and east of the Park at a distance of 30 miles. Only San Miguel could be seen on a very clear day. Classifying the sensitivity as high just because visitors stay longer is purely subjective. First, as discussed above, the Project only takes up 23 degrees of the horizon and at a distance that surely does not "dominate the landscape" thus causing impact severity to be high according to Table 3.2-1 (Sindalr-Thomas Model. In fact, the longer the visitors stay at the park, the more they will become accustomed to the turbine locations. The EIR attempts to use the Sindalr-Thomas Model as objective science, whereas it is merely a fairly insensitive tool that relies on subjective analysis. Again the dominant visual experience at the Park is associated with Ocean and immediate coastal beach views. One has to look back at the 23 degree view of the project area to even see the partially shielded turbines that are dominated by the extent of the ridge area and ocean views.</p>	<p>ACC-27</p>
<p>3.2-23, KOP 4 Jalama Beach County Park (night time views) - Please see the discussions above on general impacts to the park. The simulation of night time views is inaccurate as it shows white lights on the towers instead of red thus falsely increasing the sense on impact. Again the 23 degree of horizon does not "dominate" the setting, or significantly change the character of the night time views. At night there are many lights from the campers tents and RV's. Also there is very little use of the beach area at night due to the very cold windy nature of the site, even in the summer. Much of the year the area is also covered in fog from late afternoon until late morning.</p>	<p>ACC-28</p>
<p>3.2-23, Impact VIS-2 - All of the above comments on Impacts to Jalama Beach apply to this section as well. Additionally construction impacts that would be visible to beach users would only be very short term in duration. Just the crane work during erection of the turbines, which usually takes one to two days per turbine would be visible.</p>	<p>ACC-29</p>
<p>3.2-26 & 27, Synthesis of Project's Contribution to Cumulative Impacts & Mitigation Measure VIS-1 - Again the Draft EIR uses the subjective analysis that visual impact of the project to Jalama Beach causes a Class I cumulative impact by degradation of scenic resources in the coastal zone area of the Lompoc Valley and northern Santa Barbara County. Please see previous comments on Impacts to Jalama Beach.</p>	<p>ACC-30</p>
<p>After 3.2-28, KOP 4 - Jalama Beach Visual Simulations and Night Time Visual Simulations In General - The visual simulation site for Jalama Beach is located on the beach instead of in the campground where most persons spend most of their time. This has the affect of creating a feeling of a more pristine view than really exists. It also has the affect at night of eliminating the lighting from the tents, RV's, and store/restaurant. Additionally the night lights on the turbines show white in the simulation making them appear larger and closer than they really are. This happens in all of the night time simulation. Look at Figure 3.2-26 KOP 9, and note the red car tail lights. That is what the turbine lights should look like except much smaller and much dimmer at a distance.</p>	<p>ACC-31</p>
<p>3.3-3, Table 3.3-3 - LWEP Agricultural Land Acreages - This Table is incorrect. There are 2,950 acres in the project area, plus the Power Line route. Not a total of 387.3 acres.</p>	<p>ACC-32</p>
<p>3.4-7, Par 5 - Second to last sentence - This sentence should read: "Nevertheless, anticipated GHG emissions and benefits from the Project warrant qualitative discussions".</p>	<p>ACC-33</p>
<p>3.5-59, Par 2 - Second to last sentence - The Applicant did not propose any language that would restrict construction activity within 300 feet of a passerine nest. According to our Biologist passerines can move their nests several times during a nesting season, so disturbance of a nest is not as critical as it would be with a raptor nest. Please delete reference to this proposed mitigation, because it could have a significant adverse impact on the construction schedule, which is tight at best.</p>	<p>ACC-34</p>
<p>3.5-62, first sentence - Live trapping is not an applicant proposed mitigation measure. It is expensive and no person or entity wants to move ground squirrels on their property because of the disease that they carry and the damage that they to the land. Please remove this reference from the Proposed Mitigation Measures.</p>	<p>ACC-35</p>
<p>3.5-65, A-BIO-15 - Native Perennial Bunch Grass - There seems to be some confusion in this proposed Mitigation Measure. Bunchgrass and native grasslands are used interchangeably. The Applicant's intent is to mitigate if the project disturbs 10% of total native grass lands found on the 3,000 acre project site, not 10% of just bunchgrass.</p>	<p>ACC-36</p>

Comment Set ACC, continued

Acciona Energy North America Corporation

September 3, 2007

	<p>3.5-65, A-BIO-17, Tree Protection and Replacement Plan - The Applicant proposed protection and replacement measures are for native oak trees. The Applicant is unaware of any Board of Supervisors adopted policies that require protection and replacement of all native trees. Please remove the reference to native trees in favor of oak trees.</p>	<p>ACC-37</p>
	<p>3.5-69, A-BIO-19, Protection of Creeks, Springs, and Wetlands, second sentence - The applicant did not propose to "consult with a wetlands hydrologist", so this is not an Applicant Propose Mitigation Measure. We will certainly consult with our Biologists and Fish & Game regarding avoidance and mitigation. Because of the very limited impact on these areas, bringing in a Wetlands Hydrologist is an unnecessary expense. The requirement should be that for road construction or improvements that cross any drainage features should be reviewed and approved by a road engineer or fluvial hydrologist.</p>	<p>ACC-38</p>
	<p>After 3.5-75, Figure 3.5-1, Avian Point Count Locations - 90% of these locations are incorrectly mapped.</p>	<p>ACC-39</p>
	<p>Within the planning stages of this project the state-of-the-science was evolving with regard to raptor and bat surveys specific to wind generation. This science continues to evolve and methods and protocols for pre- and post-construction monitoring are ever-improving. As indicated by all formal publications regarding standard methods to evaluate and quantify avian and bat impacts, this project will use adaptive management and coordination to implement mortality mitigation as an ongoing process.</p>	<p>ACC-40</p>
	<p>3.6-17, A-CULT-1, Additional Archeological Surveys - Mitigation Measures in this Section are out of order in terms of sequencing of events. The Applicant has already conducted Phase 1 Cultural Work. The next step will be to analyze the potential impacts of the existing sites on proposed Project construction activities. Then the Applicant and the County would see what sites can be avoided. Following that, the Applicant and the County will decide which sites can be capped in order to avoid impacts. Finally, the Applicant will conduct Phase 2 and Phase 3 investigations on sites that cannot be avoided or capped. Some Phase 2 work might be needed to determine avoidance and capping extent. Phase 3 work will only be done on sites that cannot be avoided or capped. Please restructure this section to reflect this sequence of events.</p>	<p>ACC-41</p>
	<p>3.7-4, Impact EEU-3, New/Altered PG&E Facilities - PG&E will not have to build any temporary facilities to keep the Celite facility in operation. Delete the third sentence, "Additionally...constructed."</p>	<p>ACC-42</p>
	<p>Sec 3.8, FPES-1 Access Roads - The mitigation measure proposes that access roads be limited to 12% maximum slope and roads exceeding 10% shall be paved or covered with aggregate approved by the Fire Department. While the project designers strive to limit the grades to as low as possible, less than 12% may not be achievable on portions of this site. The civil designers will design the roads based on existing terrain, runoff, slope stability, equipment capabilities, and other factors to design the most cost effective, least environmental impact, and longest lasting route for site access. In some cases slopes may exceed 12%. Paving is not generally a good solution because of the heavy equipment using the site. The Applicant suggests removing the maximum slope of 12% requirement and any reference to paving and approval by the Fire Department.</p>	<p>ACC-43</p>
	<p>3.8-8, Impact FPES-6, Emergency Evacuation/Response - The first and second sentences should read: "For security reasons, the Applicant may request that the County close Sudden Road and Miguelito Canyon Roads beyond their intersection to their terminus at the VAFB property line. The resulting closed road would serve VAFB and the property owners that have access rights off of these roads, all of which are Project participants." Add the following sentence: "At the end of the Project life, the roads would be re-opened to the public."</p>	<p>ACC-44</p>
	<p>3.8-8, Mitigation Measure FPES-1: Access Roads - Restriction on degree of slope should be deleted from this Section, as the Fire Department has informed the applicant that since there are no habitable structures on the ridges, they are not concerned with the degree of slope. Obviously, the Applicant intends to keep the degree of slope as flat as possible because of the large loads that need to access the turbine sites, and the need for long term maintenance access.</p>	<p>ACC-45</p>
		<p>ACC-46</p>
	<p>3.10-14 Policy 4, Par 2 - Water from the O&M facility operations will be obtained from a new shallow well on the property or from an existing spring on the property. (Trucking of potable water is no longer proposed per discussions with Santa Barbara County Environmental Health Department.)</p>	<p>ACC-47</p>
	<p>Sec 3.11, NOI-1 Construction Hours - The County proposes construction hours be limited to Monday</p>	<p>ACC-48</p>

Comment Set ACC, continued

Acadent Energy North America Corporation

September 3, 2007

4.0 Cumulative Impacts	<p>thru Friday from 7am to 6pm and no work on State Holidays. Due to the tight construction schedules, the Contractor will need the flexibility to plan work for some weekends and work after 6pm, in order to meet delivery schedules and weather conditions. While this would most likely not be the normal schedule, wind conditions are such that certain work must be done during periods of calm winds for safety reasons. Also prohibiting work on State Holidays should not be a requirement for the same reason. Contractors do not recognize many State Holidays and will have to pay for manpower and equipment even though they can't work. Given the site is in remote areas and not near residences or businesses, extended work hours should have no impact on the surrounding area.</p> <p>Sec 3.11, xx – The noise model used in this report presents a worst-case-scenario. In the actual build out of the project, the Applicant will not be using as many turbines as is represented in the model, the turbines will be quieter than those in the model, and the model does not take into account the topography or the noise reducing benefit of the vegetation and trees. The Applicant expects the noise impact of the project will be within the County's regulations that are identified in the report. In addition, the Applicant currently plans on using a turbine with a noise rating of 106 dBA; however, if a different turbine with a higher noise rating (for example, 112 dBA) is used, the Applicant will ensure that the noise on the properties will remain within the County's threshold.</p>
5.0 Alternative Analysis	<p>LWEF Alternative 1 (Limit WTGs on South/West Corridors) - This proposed Alternative would have a significant adverse impact on the economics of the entire project, and would make it infeasible to develop, if it were adopted by the County. Tranquillon Ridge has the highest capacity factor in the entire project. It carries other turbine locations that would not be developed as stand alone areas.</p> <p>The County needs to balance the need for renewable energy versus the impacts to visual resources.</p> <p>5-13, Alternative 2 (Phase 1 Only) - This Alternative has an even worse economic impact to the Project. Not only are the most productive turbines eliminated but the total production is limited to 82.5 megawatts. The Lompoc Project is very expensive to develop because of the rough terrain. Unlike oil and gas projects, wind projects operate on a very thin economic margin. Even with the Federal Production Tax Credit most projects do not start to break even economically for 8-10 years. Anything that adversely impacts the economics of the project must be carefully weighed against any environmental benefit to be gained. Even though the Applicant proposes to possibly build only 82.5 megawatts, as a Phase 1, that Phase will certainly contain all of the turbines located on Tranquillon Ridge. The more megawatts that a Project can develop the more the operational costs can be spread over a greater amount of production, making the project more economical. The statement that Alternative 2 may be feasible because the Applicant is proposing it is incorrect because it does not take into account the fact that this Alternative eliminates a large number of the most productive turbines.</p> <p>5-29 & 30, Environmentally Superior Alternative - The domino effect is in place in the Draft EIR's selection of the Environmentally Superior Alternative. First the report subjectively finds that there is a Class I Adverse Visual Impact to Jajama County Beach. Next the report concludes that the solution to this perceived problem is to propose a totally uneconomic solution by eliminating the most productive turbines in the Project. It then goes on to make an incorrect assumption that since the Applicant has proposed a Phase 1 of 82.5 megawatts, then any turbines making up 82.5 megawatts are a viable Alternative. Through this tortured logic the report makes it way to naming this alternative the Environmentally Superior Alternative.</p> <p>The Applicant strongly disagrees with this Alternative being named the Environmentally Superior Alternative.</p> <p>The report could evaluate, as an Alternative, an 82.5 megawatt project that includes all Tranquillon Ridge turbines, which would meet the Project Objectives. It might qualify as the Environmentally Superior Alternative, as it would include fewer turbines and their resulting impacts.</p> <p>The Applicant believes that the Environmentally Superior Alternative should be the proposed project with all 120 megawatts of turbines. All though this would incrementally result in more environmental impact than just 82.5 megawatts of turbines including those on Tranquillon Ridge, it would result in 37.5 additional megawatts of renewable energy being developed, thus outweighing the incremental impact of developing the additional turbines.</p>
6.0 Other CEQA Considerations	

ACC-48, Cont.

ACC-49

ACC-50

ACC-51

ACC-52

ACC-53

Response to Comment Set ACC

ACC-1: The Executive Summary has been corrected to clarify that the Project, including its power line, are mostly in the 3rd Supervisorial District, except for the northern portion of the power line that enters into the 4th District as it traverses southern Lompoc.

ACC-2: This comment has been retracted by the Applicant.

ACC-3: The following text has been added to the noted paragraph to clarify the roles of Applicant proposed Power Line Alternative 1 with applicable Avoidance and Protection Measures (Section 2.8.5):

“However, implementation of Applicant proposed Power Line Alternative 1 (reroute power line to minimize visibility from SR-1) and Avoidance and Protection Measure PL-5 (longer spans, shorter poles, etc.) would reduce this impact to a less than significant level of impact.”

ACC-4: In accordance with CEQA, the selection of the Environmentally Superior Alternative was based on a comprehensive comparison of the potential construction and operation impacts associated with the Proposed Project and each of the alternatives analyzed. This comparison concluded that the LWEF Alternative 2 would have the least impacts when compared to the Proposed Project and other alternatives analyzed, except the No Project Alternative. Given that the Applicant now proposes 65 turbines rated at 1.5 MW, rather than 60 to 80 turbines rated up to 3.0 MW, the maximum electrical generation capacity for the Proposed Project is now 97.5 MW. Impact EEU-1 has been revised to reflect that the current Proposed Project would have a maximum electrical generating capacity of 97.5 MW versus 120 MW. Impact EEU-1 acknowledges that the Project would support both the U.S. Department of Energy goal of increasing the overall use of wind power to generate electricity and California’s Renewable Portfolio Standard target, resulting in a beneficial impact for the project. Section 5.3.1.2 also now acknowledges that the LWEF Alternative 2 would only generate 82.5 MW as opposed to up to 97.5 MW that the Proposed Project could provide. However, since LWEF Alternative 2 is also consistent with the noted U.S. Department of Energy and California goals, the Alternative would also result in a beneficial impact. It is noted that the magnitude of the benefit would be 15% to 22 % less than that of the Proposed Project. Please also see Response to Comment ACC-52.

ACC-5: The noted addition has been made.

ACC-6: Table 2-1 has been updated to reflect the noted land transaction.

ACC-7: The noted edits have been made.

ACC-8: The noted edit has been made.

ACC-9: The noted edit has been made.

ACC-10: The noted clarification has been incorporated.

ACC-11: The noted edits have been made.

ACC-12: The noted edit has been made.

ACC-13: The noted edits have been made. Mitigation Measure FPES-5 has been added requiring the Applicant to demonstrate that sufficient onsite water resources can be obtained from a new shallow well or existing spring on the property to adequately supply the O&M facility needs while maintaining 5,000 gallons of stored water for fire-fighting purposes.

ACC-14: The following footnote has been added to Table 2-3:

“Additional construction days/month may be added in accordance with Mitigation Measure NOI-1.”

Please also see Response to Comment ACC-48.

ACC-15: Table 2-5 has been updated to reflect the reduced size of the Sudden staging area and acknowledgement that the Larsen staging area would be located within an existing gravel pad.

ACC-16: This comment has been retracted by the Applicant.

ACC-17: This comment has been retracted by the Applicant.

ACC-18: The noted edits have been made.

ACC-19: The noted reference refers to the entire 2,950 acre project area, not the portions just to be developed. Section 3.5, Biological Resources, addresses the specific project impacts to oak woodlands.

ACC-20: The noted edit has been made.

ACC-21: The noted paragraph has been revised to clarify that there is minimal ambient light along the Jalama coast.

ACC-22: This comment has been retracted by the Applicant.

ACC-23: The noted paragraph has been revised to more accurately reflect the visibility of the proposed project from surrounding areas.

ACC-24: The noted clarification has been made.

ACC-25: The discussion of KOP 4 in Section 3.2.5.5 notes that Jalama Beach County Park provides recreational opportunities including beach and ocean recreation, overnight camping, and amenities, and that it is 4.5 miles south of the Project area. The discussion also notes that “while the primary views are toward the ocean, the whole scene is one of almost undisturbed

natural beauty. The mixture of dramatic bluffs and varied vegetation contrasted with the Pacific Ocean are the major contributing factors.” Given the visibility of up to 13 WTGs from this recreational location within an existing natural setting, the impact severity for KOP 4 was determined to be high. By contrast, KOP 6 is located in east Lompoc on 7th Street at Tangerine. This area is a developed residential neighborhood with fragmented views dominated by foreground objects and structures. In addition, there are no designated recreational areas at this location. Therefore, the impact severity for this location was determined to be low.

ACC-26: The noted clarification has been made.

ACC-27: The discussion has been clarified to state that the Park faces the “Pacific Ocean” rather than the “Channel Islands.” Assessment of visual impacts was based on multiple approaches (see Section 3.2.4, Impact Assessment Methodology). Please also see Response to Comment ACC-25.

ACC-28: Jalama Beach County Park provides overnight camping facilities. As depicted in Figure 3.2-22, clear nights do occur at the Park. The nighttime discussion for KOP 4 has been clarified to note that the beacons would most likely be synchronous flashing red beacons, not white. Please also see Response to Comment ACC-25.

ACC-29: It is acknowledged that construction activities would be temporary; however, with the start of construction at the WTG sites that can be viewed from Jalama Beach County Park, heavy equipment including cranes for the erection of towers will be visible. These construction activities will be immediately followed by the permanent presence of the subject WTGs, regardless if they are initially in operation or not. With the start of operation, the movement of the WTG blades will further exacerbate the visual presence of these structures. Since Impact VIS-2 addresses the life of the subject WTGs (construction through operation), this impact is considered to be significant and unavoidable (*Class I*). Please also see Response to Comment ACC-25.

ACC-30: Throughout Section 3.2, it is acknowledged that existing Vandenberg Air Force Base related facilities are visible along the Project area ridgelines and peaks from portions of Lompoc Valley and Jalama Beach County Park. Further, it is acknowledged that the Vandenberg facilities are visible during the day and at night. The introduction of the Proposed Project into this already disturbed environment is a further cumulative degradation of the visual quality of the area and therefore, Impact VIS-2 is considered to be significant and unavoidable (*Class I*).

ACC-31: The nighttime discussion for KOP 4 acknowledges that the WTG beacons would be at a distance of 4.5 miles and “while proportionately small in comparison to the lights from adjacent structures such as the restroom visible in the simulation, they would change the character of the nighttime views.” Further, it is unrealistic to expect that overnight campers would restrict themselves to their camp sites; they would likely take evening walks along the beach since it is the beach that was their destination. Please also see Responses to Comments ACC-25 and ACC-28.

ACC-32: Table 3.3-3 applies to the power line route only. The table title has been edited to clarify this distinction and reflect the acreages of the revised power line alignment. Section 3.3.1.1 discusses the size of the Project parcels and their zoning.

ACC-33: The noted edit has been made.

ACC-34: The commenter suggests deleting a mitigation measure that would restrict construction activity within 300 feet of a passerine nest.

Mitigation Measure BIO-12b now requires that buffer areas for passerine species be limited to 150 feet. Although, as stated in the comment, passerines “can move their nests several times during the nesting season,” any construction-related activity that impacts a nest would be a violation of the Migratory Bird Treaty Act and would therefore, require avoidance or mitigation.

ACC-35: The commenter suggests deleting a mitigation measure that proposes live trapping of rodents as a mitigation measure.

Mitigation Measure 16c has been altered deleting the live-trapping requirement; however, other feasible measures to control small mammal populations could still be required if other mitigation (i.e., habitat alteration, burrow removal) is not successful.

ACC-36: The commenter suggests clarifying the difference, if any, between the terms “bunch grass” and “native grasslands” in a proposed mitigation measure that would limit disturbance to native grasslands.

Measure BIO-8 has been revised and clarified to conform to the Santa Barbara County definition of native grasslands. The revised measure includes mitigation by seedbank salvage and replacement for instances in which less than 10 percent of the native grasslands on the property are permanently impacted.

ACC-37: The commenter suggests that the Tree Protection and Replacement Plan address only native oak trees instead of all native trees.

The measure encompasses native oak trees and other native trees (such as tanbark oaks, which are present on the site and very rare in the County). Currently no tanbark oaks are in areas proposed to be impacted by the project. This measure applies to native oak trees that occur in the proposed Project WTG corridors and other disturbance areas. Measures for riparian habitat protection and protection of creeks, springs, and wetlands address trees on the property that are not oak trees.

ACC-38: The commenter suggests deleting a mitigation measure that proposes consulting with a wetlands hydrologist, viewing this as an unnecessary expense. The commenter proposes instead that any construction or improvements that cross drainage features should be reviewed and approved by a road engineer or fluvial hydrologist.

The text has been modified, but includes a requirement for all wetland delineations and avoidance/minimization plans for the WTG corridors, including turbine sites, roadways, and collection networks, to be reviewed by a wetland scientist and approved by the County. All proposed crossings that could affect State or Santa Barbara County jurisdictional features and wetland features associated with O&M facility, staging areas, and substation would be subject to the same requirement to allow for independent review and ensure the maximum avoidance on sensitive habitats possible.

ACC-39: The commenter points out that 90% of the Avian Point Count Locations are incorrectly mapped. Figure 3.5-1 has been corrected with data provided by Acciona.

ACC-40: The commenter states that raptor and bat survey methods specific to wind generation are evolving, and further states that “this project will use adaptive management and coordination to implement mortality mitigation as an ongoing process.”

Mitigation Measure 16 allows for the requested adaptive management and coordination concerning raptor and bat survey methods. Survey methods for all BACI and mortality surveys would require the concurrence of the County prior to implementation.

ACC-41: This section was rewritten to show the following sequence of events:

- Extended Phase 1 Surveys to determine if cultural material would be affected by the project,
- Project Redesign if the Extended Phase 1 studies determined cultural material would be affected,
- Phase 2 if the project could not be redesigned to avoid cultural resources impacts, and
- Phase 3 if a site was determined significant during the Phase 2 study.

The need for additional Phase 1 Surveys was deleted. Note that although capping is a potential method to avoid direct impacts to a site, it may not necessarily eliminate the need for a Phase 2 study; although direct impacts to the site would be avoided, indirect impacts would occur because the site would no longer be available for further study.

ACC-42: The noted corrections have been made.

ACC-43: The Santa Barbara County Fire Department was contacted regarding their requirements for access roads for the LWEF. As stated by County Fire, since the access roads don't access inhabitable structures or combustible facilities, they won't be placing any access requirements on the roadways other than emergency ingress/egress. Mitigation Measure FPES-4 has been revised accordingly.

ACC-44: The noted edits have been made.

ACC-45: Please see Response to Comment ACC-43.

ACC-46: This comment has been retracted by the Applicant.

ACC-47: The noted clarification has been made. Mitigation Measure FPES-2 has been added requiring the Applicant to demonstrate that sufficient on site water resources can be obtained from a new shallow well or existing spring on the property to adequately supply the O&M facility needs while maintaining 5,000 gallons of stored water for fire-fighting purposes.

ACC-48: Mitigation Measure NOI-1 has been revised to read as follows:

“All Project construction activities, including those that involve use of heavy equipment (i.e., greater than 2-axle vehicles) along San Miguelito Road, shall be limited to between the hours of 7:00 a.m. to 10:00 p.m., except that construction at the project site within 1,600 feet of non-participating residences shall be limited to 7:00 a.m. to 6:00 p.m. Work may occur within the WTG sites on weekends and holidays, subject to written authorization from the County, and shall be limited to 8:00 a.m. to 5:00 p.m. Requests for weekend and holiday work shall be submitted to the County for approval and shall include a description of the activity to occur, including equipment usage and duration. All complaints received regarding weekend and holiday work shall be immediately submitted to the County.”

ACC-49: The Applicant expects the Project to comply with Santa Barbara County noise standards, namely the County’s Comprehensive Plan policy of 65 dBA Ldn for exterior noise exposure at noise-sensitive uses. The current plans to use a turbine rated at 106 dBA would result in lower noise impacts than the range of turbines up to 112 dBA that was analyzed in the Draft EIR. The “worst case” modeling assumptions are discussed in Section 3.11.3.1. Mitigation Measures NOI-6 and NOI-7 include performance standards and monitoring requirements to ensure that the project would comply with the thresholds established in the Draft EIR.

ACC-50: This comment has been retracted by the Applicant.

ACC-51: The Applicant’s current proposal is for the installation and operation of 65 turbines rated at 1.5 MW providing a maximum electrical generating capacity of 97.5 MW (rather than 60 to 80 turbines rated from 1.5 MW up to 3.0 MW, providing a maximum electrical generating capacity of up to 120 MW, as presented in the Draft EIR). Under LWEF Alternative 1, the installation of up to 13 WTGs along the southwestern border of the LWEF and the one WTG visible from within Miguelito County Park would be prohibited, resulting in a reduction of the maximum electrical generating capacity of 97.5 to 76.5 MW, a 22% reduction. However, as noted in Section 5.3.1.1, “it is expected that the Applicant would be able to demonstrate through performance measures that the installation of fewer WTGs could be prohibited as long as no portions of the tower or nacelle would be visible above the ridgeline from Jalama Beach County Park (only the tops of the WTG blades would be allowed to be visible).” There is also the potential to relocate WTGs on other portions of the Project site. If the relocation of WTGs were to occur within areas not considered within the Project EIR, additional environmental review would be required.

As presented in Section 1.3, the Applicant’s second objective of the project is “to develop an economically viable wind energy project that will support commercially available financing.” As presented in Section 5.1, Section 15126.6(a) of the CEQA Guidelines states that an EIR

“shall describe a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project, but would avoid or substantially lessen any of the significant effects of the project, and evaluate the comparative merits of the alternatives.” Section 5.3.1.1 demonstrates that LWEF Alternative 1 would indeed reduce the impacts associated with the Proposed Project while still achieving a beneficial energy impact; however, this benefit would be reduced by 0% to 22% depending on the ability to site the WTGs in such a way that only the blades would be visible from Jalama Beach and/or relocate WTGs within the Project sites.

The comment submitted provides no specifics to justify why the LWEF Alternative 1 “would have a significant adverse impact on the economics of the entire project, and would make it infeasible to develop.” It is recommended that the Applicant develop the required financial analysis and present it to the County decision makers.

ACC-52: Under LWEF Alternative 2, the maximum electrical generating capacity would be limited to 82.5 MW or 55 WTGs versus the 65 WTGs currently proposed by the Applicant. LWEF Alternative 2 would also require the elimination of WTGs visible from Jalama Beach County Park and Miguelito County Park. This requirement could require the relocation of up to four WTGs within other portions of the Project sites to achieve the 82.5 MW maximum electrical generating capacity. Section 5.3.1.2 demonstrates that LWEF Alternative 2 would indeed reduce the impacts associated with the Proposed Project while still achieving a beneficial energy impact; however, this benefit would be reduced by 15% to 22% depending on the ability to relocate four WTGs. If the relocation of WTGs were to occur within areas not considered within the Project EIR, additional environmental review would be required. Please also see Response to Comment ACC-51.

ACC-53: Please see Responses to Comments ACC-4, ACC-25, ACC-29, ACC-31, ACC-51, and ACC-52.