

**SUPPLEMENTAL INFORMATION  
No. 2**

For Planning Commission Agenda of:  
November 14, 2019

Item No. D-1

Re: Applicant: Humboldt Wind  
Case Numbers: CUP-18-002

Attached for the Planning Commission's consideration are the following comments:

**Comments submitted at PC 11.07.19**

1. Barbara Guest
2. Hollis Krebs & Melvin Krebs
3. Anonymous (Stated name: Rick)
4. Carol Hoopes
5. Ellen Taylor\_1
6. Ellen Taylor\_2
7. Beverly Chang
8. Mary Sanger
9. Scotia CSD
10. Pat Kanzler
11. Joan Tippets/Carol Ralph -NCC
12. Katherine Bettis
13. Jere Bob Bowden (duplicate)
14. Sarah Shakal
15. Combined comments in writing:
  - a) Pamela Brown
  - b) Ani Knight
  - c) Claire Robbins
  - d) Joanne Godinho.

**Compiled comments since PC Supplemental #1**

1. Email from Carol Ralph w/ attached letter
2. Email from Orenda Maitri
3. Email from Lynn Ryan
4. Email from Anthony DeLuca
5. Email from Tom Wheeler

Elizabeth Burks, Planner  
County of Humboldt Planning & Building Dept  
3015 H Street  
Eureka, CA 95501

May 30, 2019

To Whom It May Concern:

Thank you for the opportunity to address what I believe is the main concern and problem with the Monument Ridge Scotia wind Turbine Project. This is a very poor location to build this project because of one word, FIRE.

I am concerned with the Draft EIR's failure to address FIRE as the direct causation of the "potentially significant: Wildland Fire", which is included under a chapter called Wildfire Hazards totaling 24 pages. The purpose of the DEIR is to determine whether the project should go forward and to inform the general public of the significant environmental effects of the project. I believe the chapter on wildfires omits informing the residents of Humboldt County of the real dangers caused by wind turbines.

The DEIR states that Wildfire is a potentially significant risk without clearly showing that the Wind turbines themselves will be the cause of such wildfire. CALFIRE is the State agency responsible for providing fire protection services and addressing this environmental risk for the DEIR. CALFIRE should be the agency that recommends "No Build" but instead the DEIR states "This direct impact would be potentially significant. CALFIRE does not support development in areas where there is no local agency fire services for structure fires and emergency response", instead they provided suggestions to mitigate risks related to wildfires.

I73-1

Nowhere does this report inform the reader that FIRE is the second leading cause of catastrophic accidents in wind turbines. This is to say, it is not a remote chance of fire, but a "more likely than not" event to occur. According to Fire Safety Science, reported at the 2014 International Association for Fire Safety Science, fire data is inconsistent because the wind industry does not publicly report all fires. In fact, similar to the ornithologists, who believed only 9% of the actual bird deaths caused by wind turbines are being self-reported by the industry.

Nowhere in the mitigation measures, which appear to still be designed for small power plants, and not updated to cover wind turbines, does the requirement for fire suppression equipment to be installed on each and every single turbine as well as lightning protection systems.

Nowhere does CALFIRE mention the amount of flammable fuels in the nacelle which is the fuel load within a turbine, more than 200 gallons of hydraulic fluid and other lubricating oils and cleaning fluids. The base of the towers can also contain an additional 500 gallons of transformer oil. Yet, the mitigating measures address "clearing flammable fuels a minimum of 10 feet radius from poles and towers." (PRC4292).

The mitigation measures aim to reduce the impact from exposure to wildland fire to "less than significant levels", however, I believe history of other fires reportedly caused by wind turbines prove that not to be true.



A few examples of such fires:

1. Lake Bonney, Australia January 22, 2006 electrical failure in the nacelle caused 63,000 homes without electricity and destroyed over 190,000 acres of national park by a wildfire ignited by the turbine debris.
2. Ardrossan, Scotland December 8, 2011 turbine fire caused by lightning scattered debris over long distances due to strong wind.
3. Parry Sound, Ontario July 18, 2018 An ATV used by the wind farm construction crew during construction when the forest was tinder dry caused parched grass to ignite and burn over 27,000 acres.
4. Capital Hill wind Farm, New South Wales, Australia January 25, 2017 Massive bushfire over 8,400 acres destroyed, hundreds of sheep and cattle, sheds and one home. Sites this is the 5<sup>th</sup> serious bushfire caused by wind farms in 20 yrs.
5. Juchitan, Mexico May 12, 2017 Turbine oil seeping into ground and throwing oil into trees.

The main causes of fire ignition in wind turbines are: lightning strike, electrical malfunction, mechanical malfunction and maintenance. The DEIR does state "increased fire risks associated with wind turbine generators include construction accidents, turbine malfunctions or mechanical failure". By omitting the fact that FIRE is common and the second main cause of wind turbine failure, in my opinion, fails to inform the decision makers of the very real danger locating this project in the Redwood Forest.

173-1  
(Cont.)

No matter how well-equipped Rio Dell Fire Dept becomes, once ignition occurs in the turbine, the chances of externally fighting the fire are very small due to the height of the nacelle (590 ft) and the remote location of the wind farm. Under high wind conditions, burning debris will be carried to the surrounding forest and vegetation causing the wildfire referred to in the DEIR.

I believe this risk of FIRE is not "possible" but "probable". The risk to Scotia, the community forest, Rio Dell, the Avenue of the Giants is too great to ignore and more than potentially significant. It is a risk that is **substantial** and **potentially devastating** to our community and cannot be reasonably mitigated. Therefore, the only conservative and realistic solution is to find another location for Humboldt Wind LLC where the Redwood trees, and personal property are not threatened.

**Addendum:**

The Executive Summary states if a project results in significant and unavoidable environmental impact that cannot be feasibly mitigated to less-than-significant levels, the project can still be approved, but the lead agency's decision makers must issue a statement of overriding considerations explaining in writing the specific economic, social, or other considerations that they believe make those significant effects acceptable. I recommend, if this project is allowed to go forward in this location, the supervisors that vote for this, must be held responsible when the fire does consume the Redwood forest. There should be no indemnification for the County Supervisors that choose to ignore this very real risk and they must acknowledge that they have been informed of such. It appears that their overriding concern is tax dollars over the safe, well being of Humboldt County residents.

173-2

***Remember Paradise!***

Sincerely,  
Barbara Guest  
Redcrest, CA

November 7, 2019

Humboldt County Planning Commission

Comments on Terra Gen Wind Farm Conditional Use Permit Application EIR

We oppose this project. Our aquifer is the Pepperwood Town Area Groundwater Basin. This basin will be polluted by an oil spill into Jordan Creek.

There is no Oil Spill Response Plan. Each of these windmills is supposed to contain 400 gallons of oil for lubrication. The towers would be immediately adjacent to two earthquake faults. Appendix T, Hydrology and Water Quality Assessment, figure 3-1 clearly shows the proposed tower locations straddling the ridge line so all watersheds on both sides could receive oil spills from tower failure in an earthquake or an accidental spill during oil delivery. Individualized Oil Spill Response Plans for each watershed in the project should be prepared and reviewed by the public before any approval moves forward.

We have lived at the north end of the Avenue of the Giants for thirty five years. We will be negatively affected by the noise and air pollution caused by the batch plants running constantly for eighteen months.

This project is not necessary to Humboldt County. We loose our beautiful views and get nothing back. Not even electricity. Our views draw tourists from as close as the Bay Area and as far away as Europe and China. It is unnecessary destruction of our natural terrain and wildlife.

We admit that we started out in favor of this project but had a change of heart as soon as we heard of the much more appropriate off shore wind farm proposal. As a public trust agency the Planning Commission can not arbitrarily ignore the overwhelming public record established in opposition to this project. Thank you for considering our comments.

Sincerely,



Hollis H. Krebs      Melvin H. Krebs

31117 State Highway 254  
Scotia, CA 95565



The FEIR specifies plans to reduce raptor mortality by poisoning or otherwise killing off rodents on the project site (3.5 – 7) (9 – 108) this will result in:

- 1) The deaths of raptors due To Starvation.
- 2) The deaths of upper food chain predators like Fox, bobcat, mountain lion, and others.
- 3) The total disruption of the food chain and a catastrophic failure of the ecosystem.

The applicant has done no evaluation on the effects of poisoning in this manner upon the ecosystem. The FEIR is inadequate on this issue.

The FEIR also specifies plans to spray project areas with poisonous chemicals that will inhibit the growth of plants. Again, the applicant has done no evaluation on the effects of defoliants upon the ecosystem. The FEIR is inadequate on this issue.

The FEIR states that significant cultural resources have been found in Bridgeville (2.2.3) (9 – 7) (2.3.8) (9 – 31). These finds were not reported to state and federal agencies by the applicant. These cultural resources should be treated with respect, and need to be supervised by the state.

Applicant proposes diverting untreated industrial wastewater from HRC's cogen facility in Scotia (2.3) (3.1) (2.3 .16) (9 – 21) (9 – 37). This is not permitted by the North Coast regional water quality control Board. Additionally, the FEIR is inadequate, due to the fact that it states that their water will be taken from the Scotia pond, then in another section states that what it will be purchased from HRC (taken from the effluent of the Scotia Cogen facility).

(9 – 11) the FAA required lighting on WT G's will be a public nuisance, especially to the historic town of Scotia which is listed as a State historic site.

Wintertime operations violate HRC's HCP. The lead agency abused their discretion in deciding that applicant does not have to abide by the HCP, therefore the FEIR is inadequate on this issue.

Applicant proposes a new well at the O & M facility (9 – 20). Applicant states that this is <sup>potable</sup> possible water used only at the facility. I say that's a lie, and applicant will probably try to load water trucks using that well as a source. This appears to be an SB 1262 issue. Additionally, the FEIR is

inadequate on this issue, since it does not state the location of the 5 acre parcel to be used for the O & M facility, nor has there been a groundwater survey done at the site of the proposed well.

*Gentle Corridor*

The FEIR states the ~~Gentle Corridor~~ will be 80 feet wide, then turns around and says it'll be 100 feet wide (3.5 – 7) (9 – 108) the FEIR is inadequate

(S3 .3) (4.3.2) FEIR states that the capping of archaeological resources on the proposed site has been agreed upon by all parties. That's a lie. The Weott tribe has never agreed to that. The FEIR is inadequate.

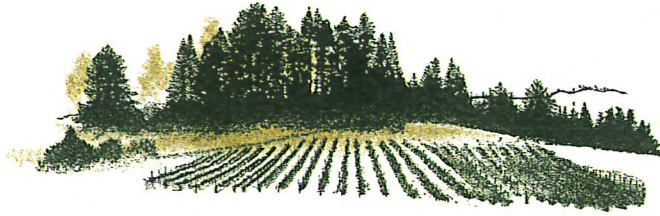
The US and Fish and Wildlife Service identified the project area as a category <sup>4</sup> for site and suggested no wind farm be developed on that area. The FEIR's definitions of acceptable are questionable. These definitions are developed within the purview of the Humboldt County planning commission, and I can only conclude that the lead <sup>agency</sup> abused their discretion in making that decision. There have been additional abuses: public review period was too short, and does not comply with SQL requirements. The FEIR is inadequate.

Too many unmitigated ~~but~~ impacts, again ignored because these definitions are within the purview of the Humboldt County planning commission. Again, the lead agency abused their discretion in making that decision. The FEIR is inadequate.

There has been no environmental impact report for the rerouting of the gentle (alternative 2). The FEIR is inadequate.

I recommend no project, since it is the most environmentally sound option.

*Monument Mtn.*  
V I N E Y A R D S



Carol Hoopes  
Monument Mountain Vineyards  
2330 Monument Rd.  
Rio Dell, CA 95562

Humboldt County Planning Commission  
c/o Humboldt County Planning Department  
3015 H St.  
Eureka, CA 95501

November 7, 2019

Dear Humboldt County Planning Commission & Director Ford:

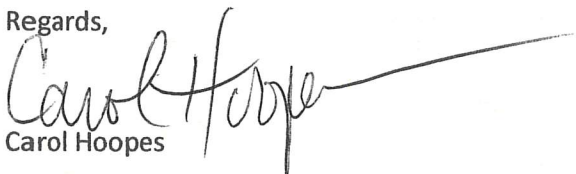
As a resident of Humboldt County at 2330 Monument Rd., Rio Dell, I have a couple points of interest which I request clarification.

The first point of interest is, what aspects of the Humboldt Wind LLC, Conditional Use and Special Permits has allowed for any start of work at the site of the application # 13999 (filed 10/05/18); Case Number: PLN-13999-CUP? As a resident on Monument Rd., traffic has increased from this project from Stantec vehicles, a heavy equipment crane, etc. Any commitment to construction on Humboldt Redwood or Russ Ranch lands prior to the wind energy tax credit deadline expiration of 12/31/2019 is the point of interest for this clarification. Is the County monitoring construction?

The second point of interest is, the up to \$2 million to \$2.5 million of taxes which the County of Humboldt will receive annually from the completion of this project. Are these property tax dollars? Are they based on an increase in Humboldt Redwood and/or Russ Ranch lands property values? The taxes received will vary depending on the number of turbines allowed to be built. Or will there be a power generated tax placed upon Humboldt residents, if the RCEA is successful in negotiating a Power Purchase Agreement (PPA) with TerraGen (Humboldt Wind, LLC). In the latter case, will the residents of Humboldt need to approve by vote an increase in utility taxes? The tax issue is complicated as the values will fluctuate depending on # of turbines and/or power generation unlike the tax dollars TerraGen has presented over and over.

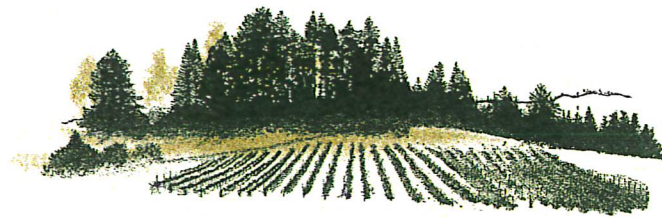
Attached please find my original letter from August 2018 to be resubmitted for the record.

Regards,

  
Carol Hoopes



*Monument Mtn.*  
V I N E Y A R D S



August 28, 2018

Humboldt County Planning Division  
Attn: Cliff Johnson, Senior Planner  
3015 H Street  
Eureka, CA 95501

**RE: Comments to Notice of Preparation of a Draft Environmental Impact Report  
Project: Humboldt Wind Energy Project**

Dear Mr. Johnson,

This letter is written to vehemently oppose the proposed Humboldt Wind Turbine Project for the Monument Ridge and Bear River Ridge in Humboldt County, California. I am writing to you as a local resident within 2 miles of the proposed project on Bear River Ridge Phase, local business owner, ancestral Humboldt County landowner since 1890's, and strong opponent to steel structures placed on scenic ridge tops in Humboldt County, CA.

It should also be noted that my academic background includes a Bachelor of Science Degree from the University of California, Davis (UCD) in Environmental Policy Analysis and Planning. During my time at UCD, as an intern for the Department of Water Resources, I wrote and contributed to a handbook on renewable energy resources and projects in the State of California.

The Humboldt Wind Energy Project (HWEP) is referred to as Monument Ridge; however, it is noted as Monument Ridge and Bear River Ridge on any topography map. The developer, by not being clear in



their legal descriptions, is acting subversively and thus is deceiving the public in the scope of the Humboldt Wind Energy Project. It will be herewith in the balance of this letter referred to as Bear River Ridge where HWEPP propose up to 25 wind turbines which most directly impacts my property on Monument Road; and it will be herewith in the balance of this letter referred to as Monument Ridge where HWEPP propose up to 35 wind turbines which will be visible from my property on Monument Road. Bear River Ridge with up to 25 wind turbines proposed is owned, to my knowledge, by the Russ family of Russ Ranches. Monument Ridge with up to 35 wind turbines proposed to the Northwest, East, and Northeast of Mt. Pierce (a radio receiver and transfer station) or also named Monument Peak is owned, to my knowledge, by the Humboldt Redwood Company.

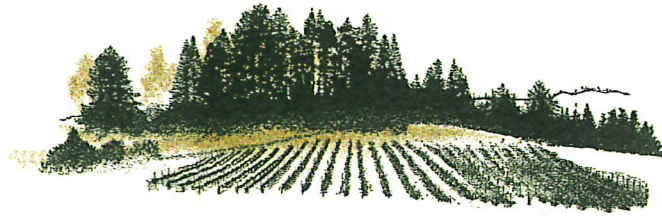
Please find my recommended areas of inquiry and analysis as expressed in the following "Impacts" 1. through 12.

#### **Humboldt Wind Energy Project Review and Comments on Notice of Preparation of Draft EIR**

1. Noise Impacts – I am concerned with the close proximity of my property to not being able to sleep with the whoosh, whoosh, whoosh... From my property at 2330 Monument Road, Rio Dell, the road/vehicle noise can be heard from the Highway 101 at Metropolitan to the North and Stafford to the East depending on the stillness or wind direction. Stafford and Metropolitan are more than 2 miles away from my residence and business. Chapter 13 of the Humboldt County General Plan (updated October 23, 2017) addresses the Noise Element which will impact my property. In addition, the operating turbines generating infrasound, low-frequency noise and audible noise will have unknown impacts to human health.
2. Shadow Impacts – Due to the sheer size, the landscape and eco systems will be adversely affected by the shadows on the habitants of the prairie and ridge top of Bear River Ridge and the habitants of the typically forested ridge top of Monument Ridge.
3. TV Reception, Cell Reception and Emergency Response Communication Impacts – Since the Mt. Pierce Radio Facilities is within a ¼ mile of these wind turbines, the blades can have an adverse impact on the reception or transfer of very valuable communication for the local communities of the Eel River Valley which includes Rio Dell and Scotia. The Radio Facilities on Mt. Pierce (Monument Peak) need evaluation for possible impacts.



# Monument Mtn. VINEYARDS



4. “Flicker” from the Rotation of the Blades Impacts – This “flicker” needs to be addressed in regards to the wildlife habitats, local landowners, and communities of the Eel River Valley. My vineyard may be adversely affected by the “flicker” or strobe light reflection.

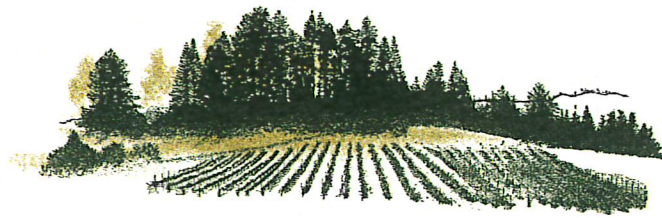
5. Traffic Impacts – TerraGen has proposed that they will utilize a road from Jordan Creek at Highway 101 which is owned and/or has easement access by the Humboldt Redwood Company; however, this is just explained to be used for the construction phase of the project. TerraGen will not upgrade, at this time, the access road of Monument Road that accesses the surface streets of Rio Dell. Monument Road is currently being used by research agencies, proposal review by local governmental agencies and proposal negotiations by TerraGen. It is my concern that Monument Road needs to be upgraded for this project to move forward. This is a very important part that the County Supervisors need to address as well as the County Planning Department since the County of Humboldt has not maintained the crumbling road for more than a decade. Although TerraGen says that they will utilize a road from Jordan Creek, this is not a 100% utilized road. Monument Road will be accessed before and after the proposed project is completed. Do not be fooled by TerraGen’s claim to not utilizing Monument Road. Research vehicles, such as Stantec, currently access Bear River Ridge and Monument Ridge by Monument Road at the time of writing this letter.

6. Scenic View Impacts – As an ancestral family member who has inhabited this Monument area since the 1890’s, I am opposed to any gross deviation from the Humboldt County General Plan in Chapter 4 in regards to (4.5) Ag Resources and (4.6) Forest Resources. Permitting a “Conditional Use” to construct multiple 590 feet steel structures with huge cement footings on agricultural and TPZ zoned lands seems like an irresponsible change of land use and it grossly deviates from the Humboldt County General Plan last updated October 23, 2017. The change of scenic and/or aesthetic views will detrimentally and adversely affect my business which is Monument Mountain Vineyards (MMV) established 2011. The wind turbines, if erected, will have a significant harm and constitute an unreasonable interference for the use and enjoyment of my property which includes normal, everyday activities. Furthermore, any change to Humboldt County scenic ridgelines, will have long term impacts on the tourism industry that Humboldt County has benefited from since the demise of the logging and fishing industry.

7. Taxes Credits– I am in opposition to TerraGen taking advantage of the federal and state tax credits available until 2020. TerraGen can rape our rural County of Humboldt while allowing their investors to reap big money. TerraGen wants to build these large 590 feet turbines to recoup reduced tax credits to sell, file bankruptcy of the Humboldt Wind LLC, and walk away from these turbines left in place on

# Monument Mtn.

V I N E Y A R D S



leased land after the 10 year bond is depleted as proposed for the operation and maintenance per Rio Dell City Council Meeting 8/21/18. This abandonment would leave the “impact” of 60 eyesores on the ridge top of Bear River Ridge and Monument Ridge which are visible throughout the Eel River Valley.

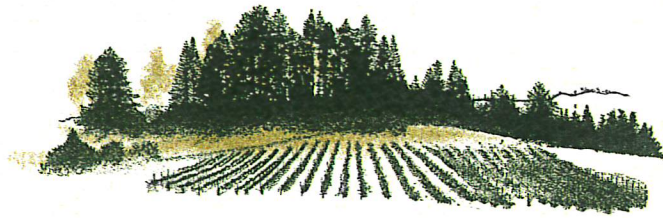
8. Property Value Impacts – The value of my property, that has been in my family since the 1890’s, will be adversely affected if the proposed Humboldt Wind Energy Project is allowed to be built. This will be a reduction in sales price for my land and winery valuation with wind turbines located within 2 miles of my property. The sheer height of these wind turbines at 590 feet is twice the height of the tallest redwood tree in Humboldt County. The ridge top of Bear River Ridge has not had redwood trees inhabit this high prairie. If the proposed wind turbines are built, it will forever change the landscape of our area which has both State and National Parks nearby; and it will forever be adversely changed with no or insufficient bonding in place for the removal of these steel structures when the wind turbines are deemed inoperative. In addition, the communities of Rio Dell and Scotia, will also be affected with low income housing potential due to the destruction of property values with the large steel structures looming over these small communities on Monument Ridge and Bear River Ridge in Humboldt County.

9. Wildlife Habitat Impacts – Since these steel structures are proposed for the ridge top of Bear River Ridge and Monument Ridge, it will adversely affect the ridge top bird migration, migration during cloudy and foggy days, raptor inhabitation, and mammal activities. Bear River Ridge and Monument Ridge are Coastal ridge tops with fluctuating fog and low lying clouds. Migrating birds will fly into wind turbines during migration with or without fog and cloud cover. Raptors will fly into wind turbines while they hunt on the high prairie with or without fog and cloud cover. And mammal inhabitants of Bear River Ridge and Monument Ridge will be adversely affected by the noise, vibrations, and flickering that has never been a natural activity. These wildlife issues need to be addressed, as I believe, that there are no mitigations to solve these adverse impacts. Furthermore, it seems imperative to conduct a NEPA project review and “consultation” under the Endangered Species Act with public input.

10. Erosion Impacts – With 50 cement-truck loads of cement per turbine foundation, the potential for erosion in an area that has not been inhabited by multiple manmade structures will be adversely impacted with erosion. Please address the erosion issues in the remote ridge top areas of Humboldt County. The erosion issues include but are not limited to the following: Platform construction, road construction and maintenance, disposition of construction materials, truck traffic, erection access of wind turbines, work truck parking, road maintenance by gravel and water trucks to reduce dust and provide stability, timber harvesting for construction, timber reforestation, and any additional grading



# Monument Mtn. VINEYARDS



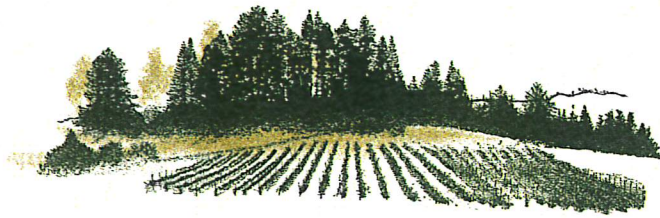
that the developer deems necessary for construction and transport of construction materials, workers, and vehicle traffic.

11. Size Impacts – These wind turbines are proposed to be 590 feet. This is over twice the size of the tallest redwood tree in Humboldt County. Why would Humboldt County allow steel structures to be placed on ridge tops that are not inhabited by any native redwood trees (Bear River Ridge) and ridge tops that are in a timber protected zone (Monument Ridge)? The Bear River Ridge is a unique and special prairie land eco system. These wind turbines are manmade structures that dwarf any structure currently built in Humboldt County. 590 foot wind turbine is equal to a 54 story tower or skyscraper. Please address as to why this is beneficial to place 25 – 54 story towers (a.k.a. wine turbines) on a visible prairie land ridge top of Bear River Ridge in Humboldt County? Please address as to why this is beneficial to place 35 – 54 story towers (a.k.a. wind turbines) on typically forested mountain tops in the realm of Humboldt Redwood Company on Monument Ridge in Humboldt County?

12. Humboldt Power Grid Impacts – According to the Director of the Redwood Coast Energy Authority (RCEA) per their Board Meeting on August 20, 2018, HWEF is a “power only” project (No “Power Purchase Agreement” – PPA) with no proposed upgrades to the power grid in Bridgeville that the HWEF’s power is proposed to be sent to for transfer to... (?). If and when this project produces power, there is no guarantee that the outdated power grid in Bridgeville will be able to handle and/or transfer this energy. In other words, this proposed power may not provide what they propose to provide. Their proposal is worded by “up to 60 wind turbines” and up to “40,000 homes” is not a solid proposal. Once these proposed wind turbines are built, the damage to our County of Humboldt is not reversible. This is a huge gamble and it is not what Humboldt County needs at this time or ever.



*Monument Mtn.*  
V I N E Y A R D S



This letter is written in the interest of myself, my family, and future generations that have an opportunity to inhabit this property. Based on my inherent interest, I write to make and explain scoping recommendations for any relevant EIR/EIS, any CEQA/NEPA, CESA/ESA and other public review processes. I recommend areas of inquiry and analysis that I deem necessary for environmental impact review. Based on public meetings and public presentations, I believe these issues to be relevant.

In addition, please find attached an enclosure of a “conceptual rendering” of wind turbines as viewed from my front yard of my home looking South toward Bear River Ridge and Monument Ridge. This “conceptual rendering” was completed based on 50 feet power poles located on Bear River Ridge past the fork on Monument Road. The “conceptual rendering” was made by a professional public relations division. The “conceptual” wind turbines are over 12 times the size of the power pole @ 590 feet.

Regards,

Carol Fritz Hoopes

Owner/Winemaker

Monument Mountain Vineyards, LLC

(707) 481-1289

[monumentmtn1@gmail.com](mailto:monumentmtn1@gmail.com)

To the  
Humboldt County Board of Supervisors, and Planning Commission  
Statement for Hearing on Terra-Gen Wind Farm Proposal, November 7<sup>th</sup> 2019

The wind farm proposed for Humboldt County appears at first glance to be a Sophie's Choice situation: pursuing our state obligation to reduce GG gases by 60% in the next 5 years or try to protect our unique redwood, doug fir and prairie habitat together with its embattled wildlife population.

The Sophie's Choice analogy falls apart at closer inspection. California is a small part of The world's GG generating surface. Terra-Gen is a subsidiary of Energy Capital Partners\*. What will be the broader environmental effects of this project which will ultimately affect us?

This is not a clean industry. Numerous of Energy Capital Partners' other subsidiaries mine Bakken shale, build crude oil terminals, pipelines, offshore platforms in Alaska, engage in fracking. They all look for opportunities to expand, and the climate for this is favorable under current administrations. The fossil fuel industry has had its most profitable years during the last 3 decades. Worldwide Increased GG gas production will be the likely result of our tidy response to California 's challenge.

The dilemma turns out to look more like a Hurwitz takeover, the results of which we have had lots of experience, culminating in loss. It's predatory industrial expansion, over which we will have little control once it starts. The results of this adventure however will have more catastrophic effects as California burns and low-lying countries go under.

Bear and Monument Ridges are sacred to a culture whose destiny it has been to survive in close proximity to its roots. Planning Commission, Board of Supervisors, listen to the Wiyot voice! Allow what they say to resonate with our own immigrant and refugee truncated roots .

Let's build bike trails bus lines car pools and solar, turning away from exploitation to developing real roots ourselves.

Ellen Taylor, President  
Lost Coast League  
PO Box 60  
Petrolia California 95558  
707 629 3500

\*Other subsidiaries: Furie Operating Alaska, Targa Resources, Triton Power Partners, US Development Group, Summit Midstream Partners, US Gulf Coast Development Opportunities and more

6/9/2019

To the Humboldt County Board of Supervisors and Planning Department:

There is no doubt that impending climate catastrophe is the critical issue of this century, and the outstanding Constitutional question, in that future generations are being discriminated against with every year we neglect to address the our atmospheric degradation with greenhouse gases.

The Terra-Gen wind project however is folly. The proposal appears at first to be a "Sophie's Choice" scenario, posing the creation of a carbon-free energy generation installation, against the preservation of critically important species habitat. We need and want both.

However, on closer examination, the analogy reveals itself to be false. The Terra-gen wind generators will produce 155 megawatts of electricity for possibly thirty years. The douglas fir and redwoods inhabiting over a thousand acres which will be sacrificed to build this project are the two most efficient trees in the world from the perspective of carbon sequestration. They will continue to perform this function for centuries. And the tons upon tons of soil, the other important terrestrial reservoir for carbon fixation, which the project will have obliterated, could continue to function as a carbon sink for an equal length of time, in tandem with the trees.

The DEIR has not calculated the carbon sequestration factor which the "no project" option offers. The forest and soils, on the almost-1000 acres, where the road is to be built, and in the 303-acre projected path of the cable connecting the project to Bridgeville, are treasures. They cost nothing, as they quietly grow and fix carbon. They also provide habitat for wildlife, the public trust resource which is being weighed against the generators in the Sophie's Choice analogy. Life is a web, in which the survival of species depends upon other species, sometimes in ways which humans discover too late. The lives of our grandchildren and great grandchildren will extend far beyond the life span of these generators. The trees and soil slated for sacrifice by this project however will be there for them,, faithfully sequestering greenhouse gases,

Carbon sequestration by trees and soil costs nothing. The Terr-Gen project on the other hand, if created, will cost taxpayers millions of dollars in tax write-offs for Terra-Gen and Stantec, as they construct the generators, and then later in deterioration costs for the next thirty years, as well as in increased electricity bills. The third richest man in the world, Warren Buffett, who has invested in many wind farms, has remarked "we get a tax credit when we build a wind farm. That's the only reason to build them. They don't make sense without a tax credit".

Although the Terra-Gen project tries to finesse all other environmental concerns with the climate catastrophe threat, its own interest are nakedly for-profit just as much as Mr. Buffett's. Stantec, the corporation which is providing environmental and geotechnical services for Terra-Gen, is heavily involved in the infamous Keystone XL pipeline and divisions of the equally disreputable Kellogg Brown and Root. This is not necessarily a reflection on their engineering capabilities in this project, only on their cynicism and potential ruthlessness as the enterprise establishes itself in our county.

It is also cynical to have chosen a location adjacent to one of Humboldt's most precious treasures, Rockefeller Forest and the high conservation valley forests of the Mattole valley. I am stunned that Humboldt Redwood Company, a certified-sustainable timber corporation, would have turned over more than a thousand acres to be ruined for tree growth forever. It is owned by the Fisher family, of whom member Robert Fisher is vice-chair of California's Strategic Growth Council, was once on the boards of NRDC, and is presently a trustee of Conservation International. This project is certainly not a sustainable one and as such violates the FSC principles HRC signed on to. Heretofore they have been very defensive about controlling their timber-producing land base, as the Lost Coast League knows all too well. The tax write-off must be irresistible.

The DEIR does not discuss possible effects of these giant generators on nearby Rockefeller Forest and the redwood trees along the Avenue of the Giants as they are difficult to identify and quantify because of the long life cycle and slowness of change in these marvelous creatures. Many of the trees appear already to be stressed, possibly by drought in dry years, or by dwindling fog brought about by climate warming or relentless timber harvesting or the effects of traffic. Regardless of the cause, no risks can be taken which might increase cumulative effects. In this context, doubts have been raised regarding a possible wind shadow, or a drying and warming effect Brought about by the slowing of wind caused by the wind generators. I am aware, as I am sure, are you, of studies performed in other areas of the country, for example in the corn belt, where the air temperature has been increased by wind turbines.

A UN study recently made public a study which documents the probable demise of over a million species in the next couple of decades .In our county, animal and plant habitats and their resident populations have been decimated by human activity over the last 150 years since the arrival in Humboldt County of European settlers. New housing developments, logging and marijuana growing have removed the shelter, protection and food supplies provided by forests , the massive spread pesticides have altered species composition in woodlands and prairies, and automobile use requirements have buried acres and acres in cement. In all of North America there is no more intact habitat anywhere, only fragments.

Some of these fragments still exist in our county and they offer the best hope for restoration. I am a physician assistant at Open Door Clinic which provides health care for a large proportion of Humboldt's population. When we treat a burn we are encouraged when there is at least a patch of skin which has not received a full-thickness burn. Recovery is able to spread out from these places. In contrast there are many areas in the United States which have been destroyed for a practical eternity. In Humboldt the best contribution we can make to reverse climate change is to throw energy behind the regeneration of our forests, rivers and meadows , not industrializing areas where there is hope of recovery with giant projects like Terra-gen's. Equal amounts of wind – generated electricity can be produced by replacing the defunct wind generators lingering off-line in Terra-gen's many other projects. Repairing or replacing these turbines may not generate the same generous tax breaks for Terra-gen and Stantec, but they will produce energy if put back online and will not destroy those powerful carbon-sequesterers, our forests.

Recent comprehensive UN studies have caused a certain unhealthy hysteria. The recognition that we have twelve years to change our ways before total catastrophe becomes inevitable is causing us to reach for any solution which will provide relief. In such an atmosphere people are more likely to be lazy, and pay a high price for turning their own powerful resource over to unscrupulous profit-seeking entities, to solve the problem for them.

In summary, opposing the Terra-gen wind project is not NIMBYism, unless you regard the entire planet as Humboldt's back yard. The wind generators do not reduce CO2 emissions, they merely produce electricity. This is made clear in the proposal. Terra-gen has no plan for reducing greenhouse gas emissions. Quite the contrary: in the construction of these generators they not only generate greenhouse gas, but also damage our terrestrial carbon sinks, the forests and the soils.

Yours,

Ellen Taylor, President  
Lost Coast League  
PO Box 60 Petrolia Ca 95558  
629 3500

1 AS I RECEIVED A PUBLIC NOTICE, HUMBOLDT COUNTY PLANNING COMMISSION NOTICE OF PUBLIC  
2 HEARING AND INTENT TO CERTIFY AN ENVIRONMENTAL IMPACT REPORT (NO DATE) ADVISING THAT NO  
3 FUTURE LEGAL ACTION MAY BE TAKEN IN REGARDS TO THIS PROJECT UNLESS FUTURE ANTICIPATED  
4 COMPLAINTS ARE RECORDED INTO THE RECORD OF THESE MEETINGS I AM USING MY TIME TO  
5 ADDRESS POTENTIAL ISSUES THAT MAY RESULT IN MY PROPERTY BEING UNINHABITABLE, DAMAGED OR  
6 RESULT IN LOSS OF VALUE DUE TO OUR COUNTY EMPLOYEES AND ELECTED SUPERVISORS ALLOWING  
7 THE CONSTRUCTION OF THIS PROJECT IDENTIFIED AS HUMBOLDT WIND LLC, CONDITIONAL USE PERMIT  
8 AND SPECIAL PERMIT APPLICATION NUMBER 13999 (FILED 10/5/2018) CASE NUMBER PLN-13999-CUP  
9 IN ITS CURRENT PLAN. I BELIEVE THE ENVIRONMENTAL IMPACT REPORT TO BE INCOMPLETE AND  
10 INADEQUATE FOR A PROJECT OF THIS SIZE AND SCOPE.

11 THIS STATEMENT IS BEING MADE FOR MY PROPERTIES LOCATED AT 1172 MONUMENT ROAD, RIO DELL,  
12 CA AND 2501 MONUMENT ROAD, RIO DELL, CA AND ANY OTHER PROPERTY OWNED BY ME, MY  
13 HUSBAND OR MY HEIRS AND IS THREE PAGES IN LENGTH.

14 I HAVE SERIOUS CONCERNS ABOUT DISTURBING THE SEISMICALLY ACTIVE GROUND IN THE GENERAL  
15 AREA DESIGNATED BY THIS PROJECT. I CANNOT BE MORE SPECIFIC ON LOCATION AS THE COUNTY HAS  
16 NOT MANDATED THAT INDIVIDUAL TURBINE LOCATIONS BE IDENTIFIED AND RELATED ENGINEERING  
17 COMPLETED FOR ENVIRONMENTAL REVIEW.

- 18 • GROUND WATER QUALITY DUE TO SITE PREPARATION, DRILLING AND ONGOING  
19 OPERATIONS
- 20 • FIRE DESTRUCTION FROM FALLING STRUCTURES, FAILING EQUIPMENT AND ONGOING  
21 OPERATIONS
- 22 • PROPERTY VALUE REDUCTION

- 1           • MISUSE/ENLARGEMENT OF THE COUNTY ROAD KNOWN AS MONUMENT ROAD THAT
- 2           RUNS THROUGH MY 2501 MONUMENT RD PROPERTY BY EMPLOYEES, THEIR
- 3           CONTRACTORS, EQUIPMENT, VENDORS OR GUESTS OF THE PROJECT
- 4           • FIRE DESTRUCTION DUE TO HIGH VOLTAGE LINES RUNNING THROUGH THE PROJECT
- 5           SITE AND TRANSMISSION LINES CONTINUING TO BRIDGEVILLE
- 6           • ELECTRICAL POLLUTION
- 7           • ANIMAL LOSS DUE TO INCREASED PREDATORS DISPLACED BY TRADITIONAL HABITAT
- 8           DESTRUCTION
- 9           • DAMAGE RESULTING FROM AIRCRAFT SPRAYING AFTER IMPACT
- 10          • DIMINISHED QUALITY OF LIFE
- 11          • HEALTH CONCERNS FOR MYSELF, MY GUESTS, AND ANY FUTURE RESIDENTS CAUSED BY
- 12           ○ AIR QUALITY
- 13           ○ SHADOW FLICKER (STROBE LIGHT EFFECT)
- 14           ○ SHOWDOWING
- 15           ○ NIGHT LIGHTING
- 16           ○ VIBRATION
- 17           ○ AUDIBLE/NON AUDIBLE (LOW FREQUENCY) NOISE
- 18           ○ ELECTRICAL POLLUTION

19 I AM INCLUDING THIS POINT FOR MY FELLOW HUMBOLDT COUNTY RESIDENTS THAT MAY NOT BE  
20 AWARE OF THIS PROCESS. LOSS OF REVENUE DUE TO ASTHETIC CHANGE IN THE AMBINCE OF  
21 HUMBOLDT COUNTY.

22 I LOOK FORWARD TO UTILIZING MY TIME ON NOVEMBER 17 TO ADDRESS MY SPECIFIC CONCERNS  
23 RESULTING FROM REVIEW OF THE FINAL ENVIRONMENTAL IMPACT REPORT.



BEVERLY CHANG COMMENTS PRESENTED AT NOVEMBER 7, 2019 HUMBOLDT COUNTY PLANNING MEETING

- 1 I AM PROVIDING A COPY OF THIS READING TO BE PLACED IN THE WRITTEN RECORD OF THESE
- 2 PROCEEDINGS.

November 7, 2019

To the Humboldt County Planning Commission

Regarding the FEIR for the Humboldt Wind Project

Dear Commissioners,

350 Humboldt supports the Humboldt Wind Project as presented in the Final Environmental Impact Report.

Our organization is a climate activism group, and we are an affiliate of 350.org, an international organization focused on fighting climate change by attacking the burning of fossil fuels. It is part of our mission to promote renewable energy in the form of wind and solar power to replace fossil fuels.

On July 18, 2019 members of 350 Humboldt heard a factual presentation on the Terra-Gen Wind Farm Project. We then conducted a consensus-based process in which we decided to support the Terra-Gen conditional use permit. Since we also wanted to get the best protections possible for local birds and bats we signed on to a letter with other local environmental groups asking for changes to the Draft Environmental Impact Report to make the Final Report the best that could be achieved for our very significant birds like the Marbled Murrelet, Northern Spotted owl, Bald Eagle and for bats, particularly, Hoary Bats.

Very significant avoidance, minimization and mitigation have been worked out in the Final report and we feel that the Planning Commission and Terra-Gen have negotiated in good faith to accommodate requests for better protections.

In addition to supporting the Humboldt Wind Project, 350 Humboldt would like to offer our appreciation to the County for taking the threat of climate change very seriously and making it a priority to achieve their goal of 100% Clean and Renewable Energy by 2025.

Mary Sanger  
350 Humboldt  
Wind Project Campaign





November 7, 2019

County of Humboldt Planning Commission  
825 Fifth Street  
Eureka, CA 95501

Re: Humboldt Wind LLC  
Case Number: PLN-13999-CUP  
Application Number 13999

Dear Commission:

Please accept this letter on behalf of Scotia Community Services District ("Scotia CSD"). The Scotia CSD is requesting that the Planning Commission reject the Conditional Use Permit and Special Permit for Humboldt Wind LLC for the following reasons:

1. The responses to Scotia CSD's Comments to the Humboldt Wind Energy DEIR did not address the NPDES permit requirements, and are therefore significantly insufficient. The water that the Humboldt Redwood Company purchases from Scotia CSD for use in their cooling tower is property of HRC only if it remains on their property. If the Humboldt Redwood Company intends to use or sell any of its discharge water off-site, it will have to be permitted and obtain approval from the California State Water Quality Control Board specific to Title 22: Recycled Water. Scotia CSD would not agree with this use as proposed. The proposed use would constitute a violation of discharge requirements under their current NPDES permit, subject to violation penalties and enforcement.
2. While the under-river crossing of the Eel River is no longer an issue, the above-river crossing has not been adequately addressed, and may still have a potential impact on Scotia CSD river water intake.
3. Scotia CSD does not believe the use of the Co-Gen cooling tower water is safe for road watering or construction. The wastewater is not fully treated before being discharged into the log pond, which could cause significant health and safety concerns. In fact, local limits sampling of the discharge has received contaminants not allowed within the NPDES permit, including issues with pH, temperature, metals, oils and greases, residual chlorine and other particulates.

November 7, 2019  
Page 2 of 2

Scotia CSD is also concerned with the lack of time that the public has had to review the DEIR/FEIR. Scotia CSD is listed as a public review location, but did not receive a hard copy until November 6, 2019 at 2:00 p.m., two days after the FEIR was posted on the County website for public review.

If you have any questions, please do not hesitate to contact this office.

PRENTICE LONG, PC



Margaret Long, Attorney for Scotia CSD

cc: Scotia CSD's Board of Directors  
Supervisor Rex Bohn,  
Nathan Vajdos and Natalynne DeLapp  
Frank Bacik  
Justin McSmith and Ronnean Lund

COMMISSIONERS:

I AM IN TOTAL SOLIDARITY WITH THE WIYOT TRIBE; I FEEL THE ROADS PUT IN AND THE WILDLIFE WOULD BE SEVERLY IMPACTED IN A DESTRUCTIVE WAY. WE ARE ALL IN SUPPORT OF CLEAN ENERGY, BUT THE WAY YOU ARE DOING THIS HAS A FOUL ODOR.....WHICH , BY THE WAY, IS WHAT NURSES DO TO FIND OUT WHAT'S WRONG, THEY SNIFF IT, AND I CAN SAY THIS PROJECT STINKS.

FIRST OF ALL, YOU ARE PUSHING THIS THROUGH WITHOUT ANY ENVIRONMENTAL IMPACT STUDIES; BUT I AM SURE THERE ARE MANY WHO SAY THAT WE NEED TO COUNTERACT THE POWER OUTAGES BY BEING PROACTIVE.

"LET'S GO GET US SOME POWER!"

THIS IMPATIENCE IS EXACTLY WHAT GOT US INTO TROUBLE IN THE FIRST PLACE, RACING TO SEE WHO COULD MAKE THE MOST POWER, NOT STOPPING TO THINK WHAT IT WOULD DO TO THE ENVIRONMENT AND THEN US.

IT APPEARS THAT JOBS WOULD BE CREATED FOR HUMBOLDT COUNTY; THAT IN ITSELF IS A DECEPTION.

YES, IT WILL CREATE SOME JOBS, BUT THEY WILL BE FOR CONTRACTORS, OR FRIENDS OF THE PLANNING COMMISSION, OR FOR THOSE WHO HAVE THE SKILLS NEEDED, AND NOT THAT MANY.....30?

MORE IMPORTANTLY, WE DO NOT NEED MORE POWER GOING INTO THE PG&E GRID, WE NEED POWER TO MAKE A MICROGRID FOR HUMBOLDT USE, AND THE TERRA GEN PROJECT WOULD SERVE PG&E'S GRID, AND WOULD PUT MONEY INTO THEIR HANDS AND THE HANDS OF CONTRACTORS

WHAT ABOUT THE RATE PAYERS OF HUMBOLDT COUNTY????????????????? WHERE ARE THEY IN THIS BUT PAYING EVER HIGHER PRICES FOR POWER WE CAN GENERATE OURSELVES OFF SHORE AS WIND OR WAVE POWER FOR OUR OWN MICROGRID. BETTER YET, THE BOARD OF SUPERVISORS OF HUMBOLDT COUNTY SHOULD LEGISLATE THAT EVERY NEW BUILDING HAVE SOLAR PANELS ON THE ROOF, AND TRY TO GET THEM ON EXISTING ROOFS USING INCENTIVES, AND!!!!!!! GET LANDLORDS AN INCENTIVE TO PUT THEM ON THEIR BUILDINGS.

YES, I AM IN SOLIDARITY WITH THE WIYOT TRIBE, I THINK THIS IS BEING PUSHED THROUGH TOO FAST, AND I THINK THERE NEEDS TO BE AN ENVIRONMENTAL STUDY.

MOST OF ALL, I THINK THE RATE PAYERS CAN BE BETTER SERVED BY HUMBOLDT GETTING ITS OWN MICROGRID, AND NOT DOING BUSINESS WITH ENERGY CAPITAL PARTNERS AND THEIR TERRA GEN PROJECT.

PAT KANZLER, RN

82 SUNSHINE WAY, EUREKA CA 95503

To: Humboldt County Planning Commission

Please see below the message with attached comment letter that we (North Coast Chapter of the California Native Plant Society) sent during the comment period for the DEIR for the Humboldt Wind Energy Project. We can find no evidence that our comment letter was posted for public viewing or was included in the FEIR. Can you please look into this and tell us what you find?

Thank you.

Carol Ralph

President

North Coast Chapter

California Native Plant Society

707-822-2015

----- Forwarded Message -----

**Subject:**Humboldt Wind Energy Project

**Date:**Wed, 12 Jun 2019 22:05:57 -0700

**From:**Carol Ralph

**To:**

Please find attached comments on Humboldt Wind Energy Project Draft Environmental Impact Report.

Carol Ralph

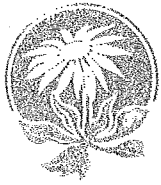
President

North Coast Chapter

California Native Plant Society

707-822-2015

I am Joan Tippetts, a Conservation Issue Investigator with the north coast Chapter of the California Native Plant Society. Our chapter represents about 400 local people in a statewide organization of about 10,000 people concerned about conservation of our native plants. We submitted a comment letter on the DEIR for this project enumerating serious deficiencies and concerns. While many of our concerns were raised by others and addressed in the final EIR, our letter was not posted on the County web site or listed in the final EIR. Therefore, we conclude that the final EIR is incomplete and is being rushed through approval without adequate consideration of all points of view.



CAIFORNIA  
NATIVE PLANT SOCIETY

**North Coast Chapter**  
P.O. Box 1067  
Arcata, CA 95518



June 14, 2019

To: California Humboldt Wind Project Planner  
County of Humboldt  
Planning and Building Department, Planning Division  
3015 H Street, Eureka, CA 95501

**Subject: Comments on Humboldt Wind Energy Project Draft Environmental Impact Report**

The California Native Plant Society (CNPS) is a statewide, non-profit environmental organization with over 10,000 members in 35 Chapters across California and Baja California, Mexico. CNPS' mission is to protect California's native plant heritage and preserve it for future generations through application of science, research, education, and conservation. CNPS works closely with decision-makers, scientists, and local planners to advocate for well-informed policies, regulations, and land management practices. The North Coast Chapter is one of 33 local CNPS chapters, whose 330-plus members are mostly in Humboldt and Del Norte Counties.

We encourage projects to avoid impacts to rare, threatened, and endangered species as well as important habitats. We are greatly concerned about project impacts to birds and other animal species, but our comments focus on elements of the environment pertaining to botanical diversity, habitat types, climate change, aesthetics, and recreation. The DEIR states that the Humboldt Wind Energy Project (Project) has the potential to impact 417.63 acres of sensitive natural communities (other than riparian habitats); 1.77 acres of riparian habitats; 5.25 acres of wetlands and other waters; and 8.86 acres of special-status plants. It's very rare that a proposed project on the North Coast would have this large magnitude of impacts. While we support renewable energy, concerns remain regarding the appropriateness of the project location given it's biodiversity and uniqueness. We question whether renewable energy needs to come at the expense of significant impacts to the environment.

An important part of the California Environmental Quality Act (CEQA) process is disclosure of the Project's potential impacts on the environment so that the public may comment on those impacts and the details of proposed mitigations. Unfortunately, the biological surveys presented in the DEIR are incomplete and do not provide adequate coverage of the project area. Additionally, the DEIR does not present detailed mitigation plans for rare plants, natural communities, invasive species, eelgrass, wetland, and riparian impacts in a manor sufficient for the public to evaluate feasibility and site-specific appropriateness. Mitigations that refer to a pending "Reclamation, Revegetation, and Weed Control Plan" constitute differed mitigation and are not acceptable. Given the potential for undisclosed impacts and the presentation of

deferred mitigations, the DEIR should be re-circulated with the findings of a complete biological surveys, impact analyses, and detailed mitigation plans.

We offer the following, more specific comments and recommendations:

1. The botanical study area for the project was partially surveyed in the year 2018, and additional surveys are planned in 2019. Botanical surveys should be completed for the entire project area so that the methods and findings of the surveys are disclosed to the public for review and commenting as part of a recirculated DEIR. Additionally, please clarify if project components in the Highway 101 transportation corridor will be surveyed.
2. The DEIR does not adequately address whether California Rare Plant Rank (CRPR) 3 or 4 taxa were evaluated for impact significance based on CEQA sections 15125(c) and/or 15380. Some of these species may be rare or unique to the region. Additionally, there may be species that are rare or locally unique that do not have a CRPR. The DEIR should provide a more thorough analysis for these taxa and include species-specific justification if a case is made that 15125(c) and/or 15380 does not apply.
3. The DEIR states that for impacts to Siskiyou Checkerbloom the Project applicant shall develop a mitigation strategy with a minimum 1.5 to 1 mitigation ratio. Given that (based on an incomplete botanical survey) 8.86 acres of Special-Status Plants may be impacted by the project, a specific and feasible in-kind mitigation plan must be included in the DEIR for public review and commenting. Additionally, the DEIR should provide examples of prior successful Siskiyou Checkerbloom mitigation and a justification for the mitigation ratio that was proposed. This comment also applies to other rare plant species, sensitive natural communities, riparian habitats, and wetlands that will be impacted. We are particularly interested in a more detailed analysis of the unique and imperiled coastal prairie habitats.
4. Eelgrass habitat is designated as essential fish habitat and is subject to no-net-loss wetland policies. The project may impact eelgrass, yet project-specific eelgrass surveys were not presented in the DEIR for public review. In accordance with the California Eelgrass Mitigation Policy and Implementing Guidelines, pre-project and post-project eelgrass surveys within the areas of potential effects needs to occur. The Project must demonstrate feasibility to mitigate direct and indirect potential impacts to eelgrass at a 4.82 to 1 mitigation ratio. The impact analysis should also include a feasible mitigation plan to mitigate for the highest potential impact area.
5. We are concerned about the spread of invasive species already within the Project area and the potential for the introduction of new invasive species. The magnitude of earth-moving and road building and the abundance of traffic offer too great an opportunity for non-native, especially invasive, plant species to move in. The DEIR does not provide an invasive species management plan. The Project's pending Reclamation, Revegetation, and Weed Control Plan was not provided in the DEIR for review and commenting and, therefore, the DEIR does not provide adequate detail on how invasive plant species will be managed.
6. The DEIR should provide a thorough analysis of impacts to the ethnobotanical cultural landscapes and tribal resources.



CALIFORNIA  
NATIVE PLANT SOCIETY

**North Coast Chapter**  
P.O. Box 1067  
Arcata, CA 95518



7. The DEIR should provide a more thorough analysis of the project's carbon footprint. What is the net reduction in carbon emissions if construction, transport, and all maintenance costs are evaluated? How will project build-out affect the project site's ability of site to sequester carbon before and after project implementation?
8. We are concerned about the Project's effects on aesthetics. The DEIR provides analyzes impacts from distant view shed, but omits analysis of aesthetic impacts to botanical enthusiasts, bird watchers, and nature lovers that pass through the actual project (e.g. Bear River Ridge's rare and unique coastal prairies) area on public roads. This aesthetic experience will be greatly diminished.
9. We are concerned about the Project's effects on recreation. Similar to our comment on aesthetics, how will project construction and implementation effect botanical enthusiasts, bird watchers, and nature lovers that pass through the actual project area on public roads. This recreational experience will be greatly diminished.
10. We are concerned about elements of project infrastructure that would remain on-site after the life of the project, including concrete pads at the base of wind turbines. Concrete pads, even if buried, will have an impact on the ecological processes of coastal prairie and other habitats. There needs to be a requirement to decommission and remove all infrastructure at the end of the project life.
11. Given that the Project may result in significant impacts to the environment, the Project should further explore alternative sites. The DEIR only briefly mentions that alternative sites were considered, but these alternative sites were not included in the DEIR analysis of Project Alternative. Less impactful alternates that meet the project's objects may exist. We'd like to see further evaluation of alternative locations and project designs.
12. Given the Project Alternatives presented, inadequacies of the DEIR, and comments we have provided, we recommend the "No Project" alternative.

Thank you for consideration.

Sincerely,

Carol Ralph  
President



Nov 7 4:30 PM Outside  
Board of Supervisors chamber

I am unable to get into the chamber for lack of space, I cannot stand for hours to wait a turn to speak, Am being silenced?

I often ride my bike on Monument, I have also ridden on Patterson Pass Road that has wind turbines,

Turbines are HORRIBLE. Loud, hideous, enormous. They, and the road + infrastructure, will destroy the mountain. Wildlife will be slaughtered.

I can't believe Humboldt County is even considering selling out this beautiful mountain for the short term gain of some greedy developers.

Cancel this project completely.

Katherine Betts  
Humboldt Hill



5 November 2019

TERRA-GEN WIND - EIR HEARINGS

Five questions:

1.

Is Humboldt County not presently doing its share of combating climate change by growing and sustaining vast forests?

2.

How can we justify clear-cutting a 25 mile swath of CO<sub>2</sub>-capturing woodlands?

3.

Given recent catastrophic fires caused by high winds and singular failures of infrastructure, how is it that we can think it reasonable to install a highly complicated industrial project in an extremely fire vulnerable location where winds are high and regular?

4.

Terra-Gen has said that all precautions have been taken to prevent possibilities of its wind turbines causing fires, but is it not known now by everyone that it takes only one small industrial failure or mistake - PGE's little sparks, for example - to create tragedy - tragedy of enormous scale and suffering?

5.

Do we really believe that taking this risk is truly wise?

Respectfully,

Jere Bob Bowden

866 Arlington Avenue

P.O. Box 1244

Ferndale, CA 95536

707-786-4434

recovery of a vessel.

In addition, vessel owners should notify a local law enforcement agency upon the theft of a vessel, and must report the

Ownership to DMV.

c. If the vessel is destroyed, lost or abandoned (in any manner), return this document with the Certificate of

a. Upon sale of vessel, provide name of vessel to DMV.  
b. Upon documentation of vessel.  
My name is Sarah Shakal

Sacramento, CA 94269-0001

Vessel owners are required to notify the Department of Motor Vehicles in person or in writing, at P.O. Box 942569,

VESSEL INFORMATION

I am here to show my

NOTE: DMV's Registrar Financial Responsibility Services are not available at DMV field offices.

Financial Responsibility (concerning financial license)  
Driver License  
Financial Responsibility (concerning vehicle registration)  
Vehicle Registration  
P.O. Box 942869, Sacramento, CA 94269-0001  
P.O. Box 997405, Sacramento, CA 95899-7405  
P.O. Box 941810, Sacramento, CA 94290-0001  
P.O. Box 941814, Sacramento, CA 94284-0884

Support for the wind project.

To request forms, make an appointment, or for information, you may contact DMV at www.dmv.ca.gov or call 1-800-777-0133. You may also write DMV at:

Immediately notify DMV if you change your address, sell your vehicle, or are involved in an accident causing injury, death, or over \$1,000 in damage. California law requires that evidence of financial responsibility, e.g., liability insurance, be carried in a vehicle at all times and presented to a peace officer upon request or when involved in a motor vehicle accident. Involvement in an uninsured reported accident will result in the suspension of your driver license. In addition, failing to provide or maintain evidence of financial responsibility will result in the suspension of vehicle registration.

Let's not allow the perfect to be the enemy of the good.

Thank you for your time

VEHICLE REGISTRATION AND DRIVER LICENSE INFORMATION



# Public Comment

\* Why are these disputed lands no longer in Wiyot holdings as ancestral sacred grounds?

PAMELA BROWN

ARCATA RESIDENT

I AM OPPOSED TO THE WINDMILL PROJECT FOR THESE REASONS (AMONG OTHERS):

1. LOCATION UNSUITED DUE TO THE DESTRUCTION OF INDIGENOUS LANDS, SACRED SITES
2. NEGATIVE IMPACT ON A NATURAL ENVIRONMENTAL BEAUTY FOR PLANTS, ANIMALS + OTHER LIFE FORMS
3. THE SHORT TIME SPAN (30yrs) WHEN BLADES, EQUIP. NEEDS TO BE REPLACED
4. LACK OF ANY SIGNIFICANT BENEFIT IN EMPLOYMENT (15 ongoing jobs)
5. IMPACT ON BIRD LIFE
6. LITTLE BENEFIT OF ACCESS TO ELECTRICITY FOR OUR COUNTY.

ANI KNIGHT. BEAR RIVER LANDOWNER

I OPPOSE THIS PROJECT FOR MANY REASONS.

1. UNSUITABLE LOCATION
2. COMPANY IS NOT TRUTHFUL ABOUT POWER GRID
3. RUINS NATURAL BEAUTY
4. ETC. ETC. 498-6395 AND I WILL GIVE YOU ALL MY REASONS



Claire Robbins, Eureka Resident

Please move next week's meeting to the Wharfinger  
so more people can be in the room.

and 2

Our energy needs need a comprehensive  
plan that include energy independence  
rather than destroying <sup>timbered</sup> unwise natural  
resources to benefit out of the area

Investors, that only ties into the out of the  
area main lines. If turbines are to be  
used, then we require state of the art  
turbines that do not have blades.

I oppose this project as all the  
energy generated will not stay in  
our county. We pay the price &  
gain nothing. We will be ruining  
so many priceless resources in  
our county for no good results  
Please hold the next meeting on 11/14  
in a larger room.

To Anne Godinho, Fortuna resident



**From:** [Carol Ralph](#)  
**To:** [CEQAResponses](#)  
**Cc:** [Planning Clerk](#); [Ford, John](#); [PlanningBuilding](#)  
**Subject:** Fwd: Humboldt Wind Energy Project  
**Date:** Thursday, November 7, 2019 1:59:34 PM  
**Attachments:** [CNPS\\_NC letter\\_HumWind\\_20190612.pdf](#)

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To: Humboldt County Planning Commission

Please see below the message with attached comment letter that we (North Coast Chapter of the California Native Plant Society) sent during the comment period for the DEIR for the Humboldt Wind Energy Project. We can find no evidence that our comment letter was posted for public viewing or was included in the FEIR. Can you please look into this and tell us what you find?

Thank you.

Carol Ralph

President

North Coast Chapter

California Native Plant Society

707-822-2015

----- Forwarded Message -----

**Subject:**Humboldt Wind Energy Project

**Date:**Wed, 12 Jun 2019 22:05:57 -0700

**From:**Carol Ralph <[theralphs@humboldt1.com](mailto:theralphs@humboldt1.com)>

**To:**[CEQAResponses@co.humboldt.ca.us](mailto:CEQAResponses@co.humboldt.ca.us)

Please find attached comments on Humboldt Wind Energy Project Draft Environmental Impact Report.

Carol Ralph

President

North Coast Chapter

California Native Plant Society

707-822-2015



CALIFORNIA  
NATIVE PLANT SOCIETY

North Coast Chapter  
P.O. Box 1067  
Arcata, CA 95518



June 14, 2019

To: California Humboldt Wind Project Planner  
County of Humboldt  
Planning and Building Department, Planning Division  
3015 H Street, Eureka, CA 95501  
[CEQAResponses@co.humboldt.ca.us](mailto:CEQAResponses@co.humboldt.ca.us)

**Subject: Comments on Humboldt Wind Energy Project Draft Environmental Impact Report**

The California Native Plant Society (CNPS) is a statewide, non-profit environmental organization with over 10,000 members in 35 Chapters across California and Baja California, Mexico. CNPS' mission is to protect California's native plant heritage and preserve it for future generations through application of science, research, education, and conservation. CNPS works closely with decision-makers, scientists, and local planners to advocate for well-informed policies, regulations, and land management practices. The North Coast Chapter has 370 members, mostly in Humboldt and Del Norte Counties.

We encourage projects to avoid impacts to rare, threatened, and endangered species as well as important habitats. We are greatly concerned about project impacts to birds and other animal species, but our comments focus on elements of the environment pertaining to botanical diversity, habitat types, climate change, aesthetics, and recreation. The DEIR states that the Humboldt Wind Energy Project (Project) has the potential to impact 417.63 acres of sensitive natural communities (other than riparian habitats); 1.77 acres of riparian habitats; 5.25 acres of wetlands and other waters; and 8.86 acres of special-status plants. It's very rare that a proposed project on the North Coast would have this large magnitude of impacts. While we support renewable energy, concerns remain regarding the appropriateness of the project location given its biodiversity and uniqueness. **We question whether renewable energy needs to come at this great an expense of significant impacts to the environment.**

An important part of the California Environmental Quality Act (CEQA) process is disclosure of the Project's potential impacts on the environment so that the public may comment on those impacts and the details of proposed mitigations. Unfortunately, the biological surveys presented in the DEIR are incomplete and do not provide adequate coverage of the project area. Additionally, the DEIR does not present detailed mitigation plans for rare plants, natural communities, invasive species, eelgrass, wetland, and riparian impacts in a manner sufficient for the public to evaluate feasibility and site-specific appropriateness. Mitigations that refer to a pending "Reclamation, Revegetation, and Weed Control Plan" constitute deferred mitigation and are not acceptable. Given the potential for **undisclosed impacts and the presentation of**



**deferred mitigations, the DEIR should be re-circulated with the findings of a complete biological surveys, impact analyses, and detailed mitigation plans.**

We offer the following, more specific comments and recommendations:

1. The botanical study area for the project was partially surveyed in the year 2018, and additional surveys are planned in 2019. **Botanical surveys** should be completed for the entire project area so that the methods and findings of the surveys are disclosed to the public for review and commenting as part of a recirculated DEIR. Additionally, please clarify if project components in the Highway 101 transportation corridor will be surveyed.
2. The DEIR does not adequately address whether California Rare Plant Rank (CRPR) 3 or 4 taxa were evaluated for impact significance based on CEQA sections 15125(c) and/or 15380. Some of these species may be rare or unique to the region. Additionally, there may be species that are rare or locally unique that do not have a CRPR. The DEIR should provide a **more thorough analysis for these rare taxa** and include species-specific justification if a case is made that 15125(c) and/or 15380 does not apply.
3. The DEIR states that for impacts to Siskiyou Checkerbloom the Project applicant shall develop a mitigation strategy with a minimum 1.5 to 1 mitigation ratio. Given that (based on an incomplete botanical survey) 8.86 acres of Special-Status Plants may be impacted by the project, a **specific and feasible in-kind mitigation plan** must be included in the DEIR for public review and commenting. Additionally, the DEIR should provide examples of prior successful Siskiyou Checkerbloom mitigation and a justification for the mitigation ratio that was proposed. This comment also applies to other rare plant species, sensitive natural communities, riparian habitats, and wetlands that will be impacted. We are particularly interested in a more detailed analysis of the unique and imperiled **coastal prairie habitats**.
4. Eelgrass habitat is designated as essential fish habitat and is subject to no-net-loss wetland policies. The project may impact eelgrass, yet project-specific eelgrass surveys were not presented in the DEIR for public review. In accordance with the California Eelgrass Mitigation Policy and Implementing Guidelines, pre-project and post-project eelgrass surveys within the areas of potential effects need to occur. The Project must demonstrate feasibility to mitigate direct and indirect potential **impacts to eelgrass** at a 4.82 to 1 mitigation ratio. The impact analysis should also include a feasible mitigation plan to mitigate for the highest potential impact area.
5. We are concerned about the spread of invasive species already within the Project area and the potential for the introduction of new invasive species. The magnitude of earth-moving and road building and the abundance of traffic offer too great an opportunity for non-native, especially invasive, plant species to move in. The DEIR does not provide an **invasive species management plan**. The Project's pending Reclamation, Revegetation, and Weed Control Plan was not provided in the DEIR for review and commenting and, therefore, the DEIR does not provide adequate detail on how invasive plant species will be managed.
6. To minimize impacts to native vegetation, the Project's pending mitigation plan should include specific measures for **conserving native topsoil** and ensuring that top soil is





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salvaged and replaced at the source location after grading activities. Additionally, the mitigation plan should consider **habitat-specific cattle grazing and management strategies** that will benefit declining native grasslands and other early succession plant communities.

7. The DEIR should provide a thorough analysis of impacts to the **ethnobotanical cultural landscapes and tribal resources**.
8. The DEIR should provide a more thorough analysis of the project's **carbon footprint**. What is the net reduction in carbon emissions if construction, transport, and all maintenance costs are evaluated? How will project build-out affect the project site's ability to sequester carbon before and after project implementation?
9. We are concerned about the Project's effects on **aesthetics**. The DEIR analyzes impacts from distant view sheds, but omits analysis of aesthetic impacts to botanical enthusiasts, bird watchers, and nature lovers that pass through the actual project (e.g. Bear River Ridge's rare and unique coastal prairies) area on public roads. This aesthetic experience will be greatly diminished.
10. We are concerned about the Project's effects on **recreation**. Similar to our comment on aesthetics, how will project construction and implementation effect botanical enthusiasts, bird watchers, and nature lovers that pass through the actual project area on public roads. This recreational experience will be greatly diminished.
11. We are concerned about elements of project infrastructure that would remain on-site after the life of the project, including concrete pads at the base of wind turbines. Concrete pads, even if buried, will have an impact on the ecological processes of coastal prairie and other habitats. There needs to be a requirement to **decommission and remove all infrastructure** at the end of the project life.
12. Given that the Project may result in significant impacts to the environment, the Project should further explore **alternative sites**. The DEIR only briefly mentions that alternative sites were considered, but these alternative sites were not included in the DEIR analysis of Project Alternative. Less impactful alternatives that meet the project's objectives may exist. We'd like to see further evaluation of alternative locations and project designs.
13. Given the Project Alternatives presented, inadequacies of the DEIR, and comments we have provided, **we recommend the "No Project" alternative**.

Thank you for consideration.

Sincerely,

Carol Ralph  
President



**From:** [Orenda Maitri](#)  
**To:** [Planning Clerk](#)  
**Subject:** Public Comment on  
**Date:** Thursday, November 7, 2019 2:13:11 PM

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Hello!

My name is Orenda, and I am a disabled resident of Humboldt County and request to make my public comment in writing as attending events can be difficult for me due to disability. I am an advocate of sustainable community energy that has the least harmful impact on ecosystems, as well as marginalized and local people. I am currently the student representative of the sustainable speaker series at Humboldt State University and a masters student in the Environment and Community program. I come to you as a privileged person with an education and having light skin.

I am deeply concerned about many aspects of the following project: "Humboldt Wind, LLC proposes the construction and operation of a wind energy project of up to 155 MW, with a project footprint involving 124 parcels, beginning west of State Highway 101, south of Rio Dell and Scotia, and terminating east of State Highway 101 in Bridgeville at the PG&E substation. Specific project components consist of:

- Up to 60 wind turbines with maximum height of 591 feet from base to highest point of blade rotation, set on concrete foundations.
- A 19 mile underground fiber optics communications system and electrical collection system linking the turbines to each other and to a substation for distribution into the General Transmission (Gen-tie) line.
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A 115 kiloVolt (kV) Gen-tie line of approximately 32 miles would transport the energy generated by the wind towers. The Gen-Tie line would begin at a new substation located west of Highway 101, span in an eastward direction, and cross under the Eel River. Once across the river, the Gen-Tie line would continue eastward as an overhead line and connect to the PG&E Bridgeville Substation for distribution into the power grid. PG&E substation expansion and improvements would be required.

- The wind tower and turbines with related components would enter Humboldt County via Humboldt Bay with anticipated port of entry at Fields Landing. No improvements to facilitate the offloading of turbine components from ships or barges have been proposed. There may be temporary off-ramps or other proposed modifications along Highway 101 to accommodate the oversized loads.
- Proposed throughout the project area are temporary and permanent operations, maintenance, and staging facilities, two temporary cement batch plants, and up to 17 miles of new access roads. Existing access roads will be widened to accommodate oversized truck-trailer loads.
- A permanent operations facility that includes related buildings and offices would be constructed on the west side of State Highway 101 at the Pepperwood/Avenue of the Giants exit."

First of all, this project does not supply power to a local community grid. Instead, it continues to support a corrupt corporation that is more concerned about profits than people.

The lack of care by PG&E has killed dozens of Californians in surrounding counties. Just yesterday, with no wind, a power-line fell to the ground at a friend's home. PG&E has been highly negligent and has had convictions of multiple felony charges due to this negligence. Secondly, this would not be a movable project and would cause great damage to ecosystems. Thirdly, this is sacred land to the Wiyot Nation and that should be reason enough not to go forward with the project. Lastly, we already have an offshore wind project in the works that will serve our communities and one the Wiyot Nation supports. I urge you to reject this damaging project.

Thank you,  
Orenda Maitri

**From:** [Lynn Ryan](#)  
**To:** [PlanningBuilding](#)  
**Cc:** [lynn\\_ryan](#)  
**Subject:** Humboldt Wind Terra Gen comments  
**Date:** Thursday, November 7, 2019 3:35:27 PM

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November 7, 2019

Dear Planning and Building,

My comments are as the Wiyot people wrote .  
Please accept them as written comments from me.

I am a North Group Redwood Chapter Sierra Club member, and am active within the Sierra Club to protect places we love. I have been paying attention to wild places here on the North Coast for decades and recognize the importance of keeping downwind forests healthy. The wisdom of mixing up hot dry upper air and cool moist tree growing weather, that I question.

Jordan Creek needs help, not more unraveling. The scope of roadbuilding that would be needed to transport heavy huge amounts of construction material up to Bear Ridge/Monument Ridge is of daunting scope for our local forest and erodible hills.

This project seems to be rushing thru weather, plant, wildlife surveys, various paperwork, not giving enough informed consent time for all of us. Too fast.

I recommended that a professional archaeologist and Native American tribal representative monitor any ground-disturbing activity associated with the project to identify any cultural resources and/or human remains that may be uncovered during project construction. The Wiyot people must be involved every step of the way, substation related routes and sites included.

I encourage RCEA to be more proactive toward local rooftop solar. Im understanding the practicality of micrograms, and am promoting the concept of micrograms in myself and with friends. However local indenergyl control and independence plays out in Humboldt County, I will remain interested and involved.

If i could figure out how to paste the Wiyot tribe comments, i would paste them here, signing on to all of the points they raised. I couldn't say it any better. Please accept them as my comments,

Sincerely,  
Lynn Ryan RN  
1693 J St  
Arcata, CA 95521  
707-845-2825  
[lynnr8@gmail.com](mailto:lynnr8@gmail.com)

**From:** [Rhapsodic Global](#)  
**To:** [PlanningBuilding](#)  
**Subject:** URGENT Bladeless Wind Turbines are cost effective, do not pose a threat to birds, with about the same energy score as the "old turbines"  
**Date:** Friday, June 7, 2019 10:22:55 PM

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Hello,

I am aware that our bird population has been growing closer to normal over the last decade. I grew up here in Humboldt County and I believe the people need you to show them your dedicated to preserving the natural abundance of amenities and wildlife.

Don't allow business that will damage our bay, forest, or marsh ecosystem, at least with wind turbines you have a great option that will both intrigue and excite people who want to see wind energy.

I've seen report that say the bladeless turbines work more effectively than old turbines, but you should research them yourself. Thanks for all of your hard work. Here's a link I found real quickly for you to start.

<https://www.evwind.es/2019/05/31/bladeless-wind-turbines-less-efficient-in-the-conversion-of-captured-wind-power-into-electrical-energy/67462>

Your local Connector,

Sincerely Anthony DeLuca

**From:** [Tom Wheeler](#)  
**To:** [Planning Clerk](#); [Ford, John](#)  
**Subject:** Mitigation for the Humboldt Wind Project  
**Date:** Friday, November 8, 2019 1:00:37 PM

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Dear Planning Commissioners,

I would like to elaborate on my testimony from last night. The County is obligated to exhaust all feasible mitigation measures before it can issue a statement of overriding considerations. A finding of the "feasibility" is left to the County--here, you--and must be made on the basis of substantial evidence in the record. That is why I was so disappointed to hear that the FEIR's conclusions about the feasibility of many mitigation measures were based on the averments of Terra-Gen and not a consideration of other factors, like whether it is employed at other wind projects or a more financial analysis of this project. (It does sound as if the rejection of Alt 5, which would have removed all turbines from Bear River Ridge, was based on economic modeling provided to the county by Terra-Gen based on Nathan's clarification. This conclusion thus appears to be more defensible than others.)

I will have a longer list of mitigation measures suggested and ultimately denied by the Planning Department for you early next week, but fundamentally they generally consider some form of "operational curtailment"--that is, not spinning blades either when species are present (called "smart" curtailment, as it uses real-time data about species presence) or likely present based on modeling. Smart curtailment is likely to present the least risk of operational shutdown and associated financial impacts, as it only applies when species are actually at risk (as opposed to modeled curtailment, which might over- and under-protect). Obviously, there is power loss, which cuts into potential profit and increases project risk. In previous studies, however, this has been determined to be a relatively minor loss of power. For hoary bat specific curtailment, as an example, the largest reported energy loss was 3.5%, but generally, smart curtailment has kept losses under 1% of total energy generation. I appreciate that, cumulatively, that even small losses can add up and render a project infeasible *but* it doesn't appear that this was adequately considered. Other information relevant to the issue of feasibility, such as the relatively newfound cost competitiveness of wind vs. other energy sources was also discounted in the FEIR's response to comments as not relevant. Such considerations are indeed important considerations, as they suggest that wind energy projects are becoming more commercially viable, and that increased project costs to mitigate environmental could be built into the sale price of the energy and still make the project competitive in the energy market. (This is particularly true as customers, like RCEA, are deliberately choosing to pay more for renewable energy, which again suggests that wind suffers less from a race-to-the-bottom pricing problem.)

One example of smart curtailment is "IdentiFlight," a commercially available product that pairs digital cameras with image recognition software to identify when at-risk species are approach a project site. Then, the software can give commands to begin shutting down individual turbines. A promotional video is available here: [https://youtu.be/\\_vLd1h-JFPo](https://youtu.be/_vLd1h-JFPo). This has been employed at at least three projects to my knowledge, including [one in California](#).

The FEIR also incorporates smart curtailment for hoary bats as a potential future mitigation measure that could be imposed by a Technical Advisory Committee (after other mitigation measures, like acoustic deterrence devices, are attempted and impacts still pass a level of significance). So fundamentally, the FEIR accepts that smart curtailment *could* be feasible, at

least in one circumstance.

I do not envy the position you sit in. You have been given an almost impossible job--weighing the incalculable impacts to wildlife against the potential benefits of low-carbon power. I wish you the best of luck as you wade through the FEIR. Please do not hesitate to contact me if you have any questions.

Best,  
Tom

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"If EPIC had not undertaken its lonely efforts on behalf of the Marbled Murrelet, it is doubtful that the species would have maintained its existence throughout its historical range in California." - Judge L. Bechtle, *Marbled Murrelet v. Pacific Lumber Co.*