

ATTACHMENT 4

REFERRAL AGENCY COMMENTS AND RECOMMENDATIONS

Referral Agency	Response	Recommendation	Location
City of Fortuna			
Cal. Dept. of Fish & Wildlife	x	Conditional Approval	Attached
Caltrans District 1	x	Conditional Approval	On file
Regional Water Quality Control Board			
Ag Commissioner			
Building Inspections	x	Comments	On file
County Counsel			
Environmental Health		Conditional Approval	On file
Public Works – Land Use	x	Conditional Approval	On file
Aviation	x	Conditional Approval	
THPO - Bear River Band of the Rohnerville Rancheria	x	Conditional Approval	On file
THPO – Wiyot Tribe			
Farm Bureau	x	Denial	Attached
Fortuna Fire Protection District	x		
Pacific Gas & Electric	x	Conditional Approval	On file
Williamson Act Committee			
Redwood Coast Energy Authority	x	Approval	Attached
State Coastal Conservancy – Great Redwood Trail Agency			
Northwest Information Center	X	Recommend Survey	On file

From: Rian, Kathryn(Katie)@Wildlife <Kathryn.Rian@Wildlife.ca.gov>
Sent: Tuesday, July 25, 2023 12:32 PM
To: Lazar, Steve <SLazar@co.humboldt.ca.us>
Subject: RE: North Coast Highway Solar 16341

Caution: This email was sent from an EXTERNAL source. Please take care when clicking links or opening attachments.

Hi Steve,

Thank you for yesterday's site visit. Seeing the area in person cleared up some of my confusion about the location of the solar array and potential impacts to adjacent habitats. My understanding is that the project won't require vegetation removal in the willow scrub or blackberry thickets, but I still think it's appropriate to incorporate avoidance measures due to the risk of noise disturbance. Ideally, any clearing, grubbing and activities that generate significant noise should take place outside of nesting season (generally March 15 – August 15). If that isn't feasible, a qualified biologist shall survey the area no more than seven days in advance of work. As a side note, the biological report mentions a survey window of 30 days, which is more than enough time for birds to begin nesting after the area has been "cleared." If an active nest is found, the permittee should consult with CDFW regarding appropriate site-specific avoidance measures and buffer distances. If there is a lapse in project-related activities of seven days or more, the biologist should re-survey the area before work resumes. As to rare plant surveys, which are mentioned in the report, I only think they are only necessary if there will be disturbance to natural or naturalized areas. If they're working entirely within the agricultural field and existing roads, then they can skip it. That said, CDFW generally discourages applicants from deferring surveys as mitigation, since we cannot fully evaluate impacts without knowing what's there. If they choose to take that risk, they should describe thresholds of significance (i.e., what triggers avoidance/mitigation) and outline what steps will be taken to minimize or mitigate for impacts (e.g., complete avoidance, seed collection and/or salvage, etc.).

We had discussed the difficulty of permitting solar projects in AE-zoning given the conversion to non-agricultural uses. This is an excellent opportunity to co-locate pollinator habitat with agricultural and industrial land use, providing several ecological and economic benefits. Adjacent riparian corridors, hedgerows, and other naturalized areas already provide nesting and overwintering habitat, so the addition of diverse foraging habitat would be very beneficial to native pollinators. There are also benefits to adjacent agriculture, including pollination, pest control, and water quality improvements. The applicant should consider developing a plan to plant and maintain locally appropriate native plants, focusing on species that provide the greatest value to bees, moths, butterflies, and other native pollinators. Some potential options include yarrow (*Achillea millefolium*), farewell to spring (*Clarkia amoena*), California poppy (*Eschscholzia californica*), riverbank lupine (*Lupinus rivularis*), California bee plant (*Scrophularia californica*), and rough hedenettle (*Stachys rigida*). However, CDFW recommends the applicant work with a qualified biologist or consultant, such as Samara Restoration, to develop an appropriate species list and planting plan. To maintain habitat value, mowing should not occur during the bloom period, though targeted removal of invasive species is encouraged. Adjacent hedgerows and willow thickets should be left undisturbed. I've attached a report about the compatibility of solar arrays and pollinator habitat, prepared by Pollinator Partnership. The species list is specific to Marin and Contra Costa counties, but the general concepts apply anywhere.

Let me know if you have any questions.

Katie

From: [Katherine Ziemer](#)
To: [Dorris, Joshua](#)
Subject: Farm Bureau Comments on the Alton/Hydesville Solar Project
Date: Thursday, August 20, 2020 3:47:06 PM
Attachments: [Alton Solar 2020 Kz.doc](#)

Hi Joshua: Attached is the Farm Bureau Comment Letter on the Alton/Hydesville Solar Project. Thank you for allowing us the extra time to make our comments. If you have any questions, please don't hesitate to give me a call. Sincerely, Katherine Ziemer

Katherine Ziemer
Executive Director
Phone (707) 443-4844
Fax (707) 443-0926



Humboldt County Farm Bureau

5601 So. Broadway, Eureka, CA 95503
Serving Agriculture Since 1913

August 12, 2020

Humboldt County Planning and Building Department
3015 H Street
Eureka, CA 95503

Re: Applicant (APPS#) PLN-2020-16341 North Coast Highway Solar

Dear Planning Commission:

The Humboldt County Farm Bureau would like to express our opposition to the North Coast Highway Solar project which converts 13 acres of Agricultural Exclusive land in the Alton area to a Solar Project. We do not understand how this project can support the goal of “No Net Loss of Agricultural Lands” as stated in the County Project Transmittal attachment. Projects such as this one will continue to degrade and remove land out of agriculture production which will undermine the natural resources that our county should be protecting. This project IS a net loss for agriculture lands now and into the future.

We urge you to not approve this Conditional Use Permit and protect the limited amount of Ag Land in the county. If you plan to move forward, we believe the applicant should be required to post a bond to assure the county that the property will be returned to the original condition at the end of the 20 year life expectancy. Specific details should be listed such as to remove the concrete, metal and equipment and prepare the soil for agricultural operations at the end of the project.

Sincerely,

Katherine Ziemer
Executive Director



REDWOOD COAST Energy Authority

July 29, 2020

**BOARD OF
DIRECTORS**

Dear Joshua Dorris,

Michael Winkler
CITY OF ARCATA

Please find the request for comments form for the North Coast Highway Solar 1 project enclosed with this letter. As indicated by the form, Redwood Coast Energy Authority (RCEA) would like to recommend approval of this project. However, please note that the documents included with the requests for comments form indicate that this project entered into a power purchase agreement with PG&E when this project actually has an executed power purchase agreement with RCEA.

Chris Curran
CITY OF BLUE LAKE

Austin Allison
CITY OF EUREKA

The project in question is a part our Feed-in Tariff program, which has been designed to encourage renewable energy generation in Humboldt County.

Stephen Avis
CITY OF FERNDALE

Thank you for reaching out to us for comment. Please let me know if you have any questions about our response or engagement.

Dean Glaser
CITY OF FORTUNA

Sincerely,

Sheri Woo
HUMBOLDT BAY
MUNICIPAL WATER
DISTRICT

Mahayla Slackerelli
Account Services Manager
Mslackerelli@redwoodenergy.org

Estelle Fennell
COUNTY OF HUMBOLDT

Frank Wilson
CITY OF RIO DELL

Dave Grover
CITY OF TRINIDAD

633 3rd Street
Eureka, CA 95501
(707) 269-1700

info@redwoodenergy.org

www.RedwoodEnergy.org



COUNTY OF HUMBOLDT
PLANNING AND BUILDING DEPARTMENT
CURRENT PLANNING
3015 H STREET, EUREKA, CA 95501 ~ PHONE (707) 445-7245

7/23/2020

Project Referred To The Following Agencies:

Fortuna, AG Commissioner, County Counsel, PW Land Use, Building Inspections, Farm Bureau, Cal Fish & Wildlife, CalTrans Dist 1, Bear River Band, NWIC, Wiyot Tribe, Other

Applicant Name North Coast Highway Solar 1, LLC c/o Borrego Solar Systems, Inc. **Key Parcel Number** 204-081-002-000

Application (APPS#) PLN-2020-16341 **Assigned Planner** Joshua Dorris 707-268-3779

Please review the above project and provide comments with any recommended conditions of approval. To help us log your response accurately, please include a copy of this form with your correspondence.

Questions concerning this project may be directed to the assigned planner for this project between 8:30am and 5:30pm Monday through Friday.

County Zoning Ordinance allows up to 15 calendar days for a response. If no response or extension request is received by the response date, processing will proceed as proposed.

☐ If this box is checked, please return large format maps with your response.

Return Response No Later Than: 8/7/2020

Planning Clerk
County of Humboldt Planning and Building Department
3015 H Street
Eureka, CA 95501
Email: PlanningClerk@co.humboldt.ca.us **Fax:** (707) 268 - 3792

We have reviewed the above application and recommend the following (please check one):

- ☒ Recommend Approval. The department has no comment at this time.
- ☐ Recommend Conditional Approval. Suggested conditions attached.
- ☐ Applicant needs to submit additional information. List of items attached.
- ☐ Recommend Denial. Attach reasons for recommended denial.

Other Comments: _____

DATE: July 29, 2020

PRINT NAME: Mahayla Slackerelli