



HUMBOLDT WIND, LLC
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November 25, 2019

VIA HAND DELIVERY

Members of the Board of Supervisors
Humboldt County
825 5th Street, Room 111
Eureka, CA 95501

Re: Denial of Conditional Use Permit and Special Permit for Humboldt Wind Energy Project (Record No. PLN-13999-CUP)

Honorable Members of the Board of Supervisors:

Humboldt Wind, LLC hereby appeals the November 21, 2019 decision of the Planning Commission of the County of Humboldt to deny its application for a Conditional Use Permit and Special Permit for a wind energy project (the "Project"). This appeal is pursuant to Section 312-13 of the Humboldt County Code. For the reasons stated below, Humboldt Wind, LLC urges the Board of Supervisors to reverse the Planning Commission's decision and approve the Project.

The Project's Benefits Outweigh the Significant Unavoidable Impacts

As stated in its Resolution, the Planning Commission concluded that the Project's benefits would not outweigh the significant unavoidable impacts. As reflected in the record, however, and as detailed in the staff report for the November 21 meeting, substantial evidence demonstrates that the County would derive numerous important benefits. Collectively, these benefits would outweigh the significant unavoidable impacts and include the following:

- **Statewide Environmental Benefits.** The Project would assist California in meeting the Renewables Portfolio Standard goals of 50% of the state's electricity from eligible renewable energy resources by 2030, and it would contribute to a diversified statewide energy portfolio that would reduce exposure to price volatility associated with electricity and natural gas. The project also would replace outdated energy sources such as the Potter Valley Dam and the Klamath Dam, which are being decommissioned. The Project would displace emissions of approximately 384,068 metric tons per year of carbon dioxide that would otherwise be required to generate the same amount of electricity as the Project.

- **Local and Regional Environmental Benefits.** The Project would further numerous General Plan policies, all of which encourage the use of renewable energy resources. These include Policy E-G3 (Supply of Energy from Local Renewable Sources), Policy E-P3

(Local Renewable Energy Supply), and Policy E-P13 (Incentives for Using Alternative Energy). The Project also would contribute toward the Redwood Coast Energy Authority's target of 100% clean and renewable electricity by 2025 and would produce more than 60% of the electricity used by the Redwood Coast Energy Authority's customers, who represent more than 90% of the electricity customers in Humboldt County.

- **Infrastructure Benefits.** The Project would: provide \$13,912,000 in local grid improvements, and \$5 million for undergrounding of high-risk PG&E distribution lines; update old infrastructure in Humboldt, Cottonwood, and Bridgeville; update the transmission lines from Bridgeville to Cottonwood; result in a \$2.2 million decoupling from Cottonwood and the broader grid; reduce reliance on local natural gas; and be sufficient to power 70,000 households.

- **Economic Benefits.** The Project would create short- and long-term employment opportunities by creating approximately 15 full-time jobs and approximately 300 construction jobs, and it would provide broader economic benefits to the County through increased spending in the community as a result of construction. The Project also would result in an estimated \$50 million dollars in tax revenue over 30 years.

- **Resource Benefits.** The Project would allow Russ Ranch to be kept as contiguous prairie grasslands surrounded by forest in a large tract that is not fragmented or subdivided. The Project is more protective of these resources than the no project alternative because it would provide the landowners with the economic ability to preserve the integrity of the landscape and to avoid the fragmentation caused by housing development.

- **Benefits to the Knowledge Base.** The formation and operation of a Technical Advisory Committee would allow the scientific community to study specific populations of bats known to occur in the region, including the hoary bat, and understand population trends in general, as well as the impacts of the Project on the population. A similar level of scientific knowledge would be provided for avian species. This will contribute to the greater scientific knowledge base and support future environmental analyses and mitigations.

In short, approval of the Project will provide numerous substantial benefits to Humboldt County and the broader region, and the Planning Commission's decision should be reversed. For these reasons, Humboldt Wind, LLC urges the Board of Supervisors to approve the Project.

Sincerely,
HUMBOLDT WIND, LLC



Randy Hoyle
SVP & Chief Development Officer