

1 INTRODUCTION

On April 15, 2019, Humboldt County (County) released to the general public and public agencies the draft environmental impact report (DEIR) for the Humboldt Wind Project. The DEIR contains an environmental analysis of potentially significant effects of implementing the proposed project. Together, the DEIR and this document, which includes the response to comments on the DEIR and additional technical information, constitute the final environmental impact report (FEIR) for the Humboldt Wind Project.

In accordance with Public Resources Code Section 21091 and California Environmental Quality Act (CEQA) Guidelines Section 15087, a 51-day public review period for the DEIR was provided. The public review period was extended to June 14, 2019, for a total of 60 days, to provide additional time to review the documents.

The public was advised of the availability of the DEIR through legal notices placed in local newspapers, e-mails, direct mailings, and notification on the County planning website. A public notice (notice of availability) was posted with the Humboldt County clerk/recorder and was published in the Eureka Times Standard. Copies of the DEIR were also made available for review at the following locations: the Humboldt County Planning and Building Department; the Humboldt County Public Libraries in Rio Dell, Ferndale and Eureka; the Scotia Community Services District; and the Fortuna Multi-Generational Center.

During the public review period, comments were received from numerous agencies, organizations, and individuals. This document provides responses to the written comments received during the public review period. The focus of the response to comments is on the disposition of environmental issues that have been raised in the comments, as specified by CEQA Guidelines Section 15088(b). This FEIR also provides additional technical information that has become available since circulation of the DEIR, along with updated information on the project description and refined project footprint.

This document is organized as follows:

Chapter 1, “Introduction,” provides a brief overview of the public review process for the DEIR and describes the organization of the FEIR. Chapter 1 also includes a summary of updates to the project description since circulation of the DEIR and an overview of additional technical studies and analyses conducted since circulation of the DEIR.

Chapter 2, “Master Responses,” addresses common themes or concerns repeated in the comment letters received on the DEIR through a series of master responses. Eleven Master Responses have been prepared.

Chapters 3 through 8 provide summaries of and responses to all written comments on the Humboldt Wind Energy Project DEIR received during the public review period. Each chapter provides a list, in table format, of all written comments received on the DEIR. Chapters 3 through 8 are organized as follows:

- ▶ Chapter 3, “Federal Agency Comments and Responses”
- ▶ Chapter 4, “State Agency Comments and Responses”
- ▶ Chapter 5, “Regional and Local Agency Comments and Responses”
- ▶ Chapter 6, “Tribal Comments and Responses”
- ▶ Chapter 7, “Organizational Comments and Responses”
- ▶ Chapter 8, “Individual Comments and Responses”

Chapter 9, “Revisions to the DEIR,” provides a reproduction of select portions of the DEIR with proposed revisions to text made by Humboldt County and in response to comments or as a result of additional technical information that has become available since circulation of the DEIR.

Chapter 10, “References,” lists all references used during the preparation of this FEIR, as well as citations for personal communications.

Chapter 11, “List of Preparers,” identifies all preparers of and contributors to the FEIR.

The following information is provided in **Appendices to this FEIR**:

- ▶ Appendix A. Comments Received on the DEIR
- ▶ Appendix B. Updated Technical Information
- ▶ Appendix C. Updated Project Maps

1.1 REFINEMENTS TO THE PROJECT DESCRIPTION SINCE CIRCULATION OF THE DEIR

Since issuance of the Draft EIR, the project applicant has continued to coordinate with County staff and the regulatory agencies to further refine the project layout based on the presence of sensitive resources and other factors. Supplemental technical studies conducted in support of the project were used to further refine the project footprint. The project applicant also reviewed public comments submitted in response to the DEIR to assess whether project refinements that respond to concerns stated by commenters could be incorporated. As a result, the project applicant has made a number of refinements to the proposed project since circulation of the DEIR. These refinements include the following:

Overall Reduction in Anticipated Ground Disturbance. Since the circulation of DEIR, the applicant has refined the project footprint by narrowing the project corridor and micro-siting wind turbine generators (WTGs). This has resulted in a reduction of the anticipated ground disturbance footprint from approximately 900 acres of permanent and temporary impacts analyzed in the DEIR to approximately 655 acres discussed in this FEIR. Figure 1.1 shows a comparison of the DEIR and FEIR project footprints.

Realignment and Shortening of the Gen-tie. Since circulation of the DEIR, the applicant has revised the proposed gen-tie alignment to completely avoid all northern spotted owl activity centers located in the vicinity of the gen-tie and to avoid northern spotted owl nesting and roosting habitat to the maximum extent possible. The total length of the gen-tie has been reduced from approximately 25 miles to approximately 22 miles. Where possible, the realigned gen-tie corridor has been co-located with existing access roads to avoid and minimize ground disturbance and vegetation removal. The location of the realigned gen-tie corridor in relation to the original gen-tie alignment is shown in red in Figure 1-1. For the limited instances in which the realigned corridor is located outside the survey corridor analyzed in the DEIR, additional field surveys have been conducted to cover all areas of the realigned corridor. Reports presenting the results of these additional surveys are included in Appendix B of this FEIR.

Reduction in the number of WTGs from 60 to 47. Since circulation of the DEIR, the applicant has reduced the number of proposed WTGs from 60 to 47, spread across Monument Ridge and Bear River Ridge. The location of the proposed WTGs is shown in Figure 1-1. Through this micro-siting of each individual WTG, the project applicant was able to further avoid and/or minimize impacts. Specific impacts addressed through micro-siting or removal of proposed WTGs include: avoidance of known cultural resource sites on Bear River Ridge; avoidance and minimization of impacts on biological resources, in particular marbled murrelets and northern spotted owls by removing WTGs from areas of known high activity of these species; and elimination of significant noise impacts on sensitive receptors by removing a WTG from the vicinity of a residence. The number of WTGs on Bear River Ridge was reduced from 23 to 20 and the number of WTGs on Monument Ridge was reduced from 37 to 27 turbines.

Overhead Crossing of Gen-Tie Line Over Eel River. As described in the DEIR, the original project proposed to underground the gen-tie line under the Eel River using horizontal directional drilling. After consultation with the County and the National Marine Fisheries Service (NMFS), which expressed concerns about potential frac-outs during drilling that could result in adverse effects on aquatic resources in the river, the project applicant agreed to cross the Eel River with an overhead alignment of the gen-tie line. The overhead alignment would follow the route included in Alternative 2 in the DEIR. The overhead realignment would require work on additional properties not previously listed in Table 1 in the Project Description in the DEIR. The following additional Assessor Parcel numbers (APNs) are now included: 205-311-001, 205-321-006, 205-051-003, 205-061-004, and 205-341-019.

The new gen-tie alignment is located 1.8 miles east of the previously proposed route shown in the DEIR. This relocation would reduce visibility of the gen-tie line to surrounding communities. The gen-tie would be constructed using wooden H-frame and steel monopole structures such as shown in Figure 2-10 in the DEIR. The gen-tie line would depart Monument Ridge 1.6 miles east of the previous location and would traverse due north towards the west edge of the unincorporated community of Stafford, California. The gen-tie line would approach the Richard Fleisch Memorial Bridge from the east and turn north to cross the Eel River on the west side of the bridge. The gen-tie line would be at the same height as the deck of the Richard Fleisch Memorial Bridge. The crossing would be similar to the Pacific Gas and Electric Company's (PG&E's) existing three transmission lines located on the east side of the bridge. The conductors would be placed within the profile of and near the existing Richard Fleisch Memorial Bridge to avoid avian collisions, specifically by marbled murrelets.

Once on the east side of the Eel River, the gen-tie would cross U.S. 101 adjacent to PG&E's distribution line. The gen-tie would then continue adjacent to Shively Road for 0.8 mile before crossing Stitz Creek just south of the earthen dam. After crossing Stitz Creek, the gen-tie would proceed directly up Shively Ridge before connecting with the proposed gen-tie corridor at the western terminus of Shively Ridge Road. The gen-tie line would continue due east on private land without public access toward the unincorporated community of Bridgeville, California. As the gen-tie line approaches Bridgeville, it would cross Alderpoint Road 0.42 miles south of the intersection of Hwy 36 and Alderpoint Road. After crossing Alderpoint Road, the gen-tie line would proceed northeast toward the PG&E Bridgeville substation. As the gen-tie line approaches

the PG&E Bridgeville substation from the south, the line would cross Hwy 36 from the south and continue 0.16 miles to the north to the proposed connection with the PG&E Bridgeville substation.

Realignment of Access Roads. Since circulation of the Draft EIR, the applicant has agreed to incorporate the “realigned Jordan Creek access” at the Jordan Creek staging area, as described in Alternative 2 in the DEIR. From the Jordan Creek laydown area, the access road would continue in an easterly direction, parallel to or in the same location as Demonstration Forest Road Left (DEMO-Left) and an existing PG&E service road. The realigned access road would be co-located with the DEMO- Left and PG&E service roads for 0.61miles. At this point, the access road alignment would depart from the existing PG&E road and turn south along a new alignment up Monument Ridge. This new alignment would continue for 0.4 mile before rejoining DEMO-Left. The new alignment would follow DEMO-Left for an additional 2.58 miles before rejoining the original proposed alignment. The new alignment of the access road would then depart from DEMO-Left road for 1.1 miles continuing up Monument Ridge and then rejoin DEMO-Left for 1.28 miles. The new alignment is slightly longer (by approximately 1 mile) than the original alignment, but would follow an existing road where feasible, while at the same time avoiding and minimizing the impacts of creating new access roads. The new alignment of the access road would completely avoid northern spotted owl activity centers and minimize impacts on northern spotted owl nesting, roosting, and foraging habitat.

Reduced Substation Footprint. The applicant now proposes a reduced footprint for the project substation from approximately 5 acres to 2.5 acres to reduce overall site disturbance. The reduced substation footprint is shown in Figure 1-1 below.

Bridgeville Substation. The Bridgeville substation expansion footprint remains unchanged. Mitigation Measure 3.6-1b specified that no excavation would be done at this location. However, since circulation of the DEIR, it was determined by the applicant that this mitigation measure was not feasible. The site has been subjected to surface and subsurface investigations to determine whether significant cultural resources are present in the area of expansion. These studies resulted in data that indicated that while significant cultural resources are present at Bridgeville, the portion of the site that occurs in the expansion area lacks integrity and is not eligible for inclusion in the California Register of Historic Resources/National Register of Historic Places.

The battery storage project at the Bridgeville substation analyzed in the DEIR cumulative impact discussion is no longer proposed.

1.2 SUPPLEMENTAL TECHNICAL STUDIES CONDUCTED SINCE CIRCULATION OF THE DEIR

Since circulation of the DEIR, the project applicant has conducted several supplemental technical studies to substantiate impact analyses presented in the DEIR. Where appropriate, these studies are included in Appendix B of this FEIR. Due to the sensitive nature of the information, cultural resources studies are not included in Appendix B. Specific studies included are the following:

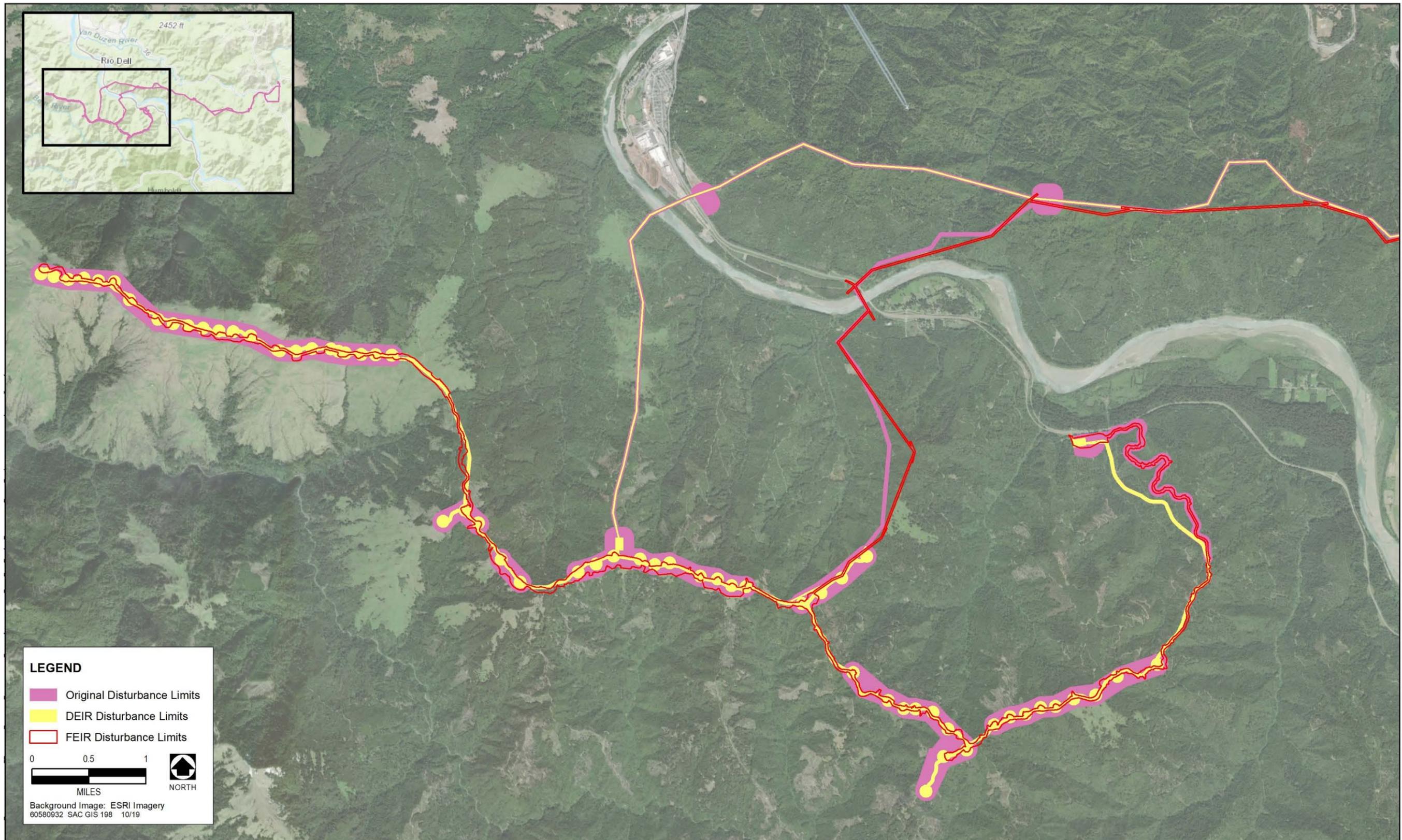
- ▶ 2019 Botanical Resources Survey Results Memo (prepared by Stantec Consulting Services, Inc., dated August 27, 2019)
- ▶ Adjustments to Turbine Siting and Revised Take Estimate for Murrelets (provided by H.T. Harvey & Associates, dated August 19, 2019)
- ▶ Bat Acoustic Monitoring Report Addendum (prepared by Stantec Consulting Services, dated August 5, 2019)
- ▶ Compensatory Mitigation Strategy for Marbled Murrelet Impacted by Operation of the Humboldt Wind Project (prepared by H.T. Harvey & Associates, dated September 2019 [cover] and August 2019 [body])
- ▶ Credit Agricole Letter (dated September 12, 2019)
- ▶ Disposal Field Suitability Investigation Results (prepared by SHN Engineers & Geologists, dated June 21, 2019)
- ▶ Eagle and Raptor Nest Survey Report – Year 2 (prepared by Stantec Consulting Services, Inc., dated August 30, 2019)
- ▶ Eagle Use Count Survey Results Memo November 2018–August 2019 (prepared by Stantec Consulting services, dated September 3, 2019)
- ▶ Eelgrass Avoidance Recommendations (*Eelgrass Avoidance Recommendations for the Humboldt Wind Energy Project* by Merkel & Associates, Inc., dated June 2019)
- ▶ Marbled Murrelet Radar Survey Report - Year 2 (prepared by Stantec Consulting Services, Inc., dated September 16, 2019)
- ▶ Marbled Murrelet Collision Risk Assessment Two Year Report (*Marbled Murrelet Collision Risk Assessment Associated with the Humboldt Wind Project Proposed for Humboldt County, California: 2-Year Report* by H.T. Harvey & Associates, dated September 2019)
- ▶ Non-technical Summary of Marbled Murrelet Mitigation Strategy (*Non-technical Summary of the Compensatory Mitigation Strategy Proposed for Marbled Murrelets impacted by Operation of the Humboldt Wind Energy Project* by H.T. Harvey & Associates, dated August 2019)
- ▶ Northern Spotted Owl Activity Center Occurrences Memo (*Northern Spotted Owl Activity Center Occurrences Discussion and Figures* by Stantec Consulting Services, Inc., dated September 30, 2019)
- ▶ Northern Spotted Owl Off-Site Mitigation Sites (*Potential Sites for Off-Site Mitigation of Loss of NSO Habitat* by Stantec Consulting Services, Inc., dated October 17, 2019)
- ▶ Northern Spotted Owl Survey Results 2019 (prepared by ICF, dated September 2019)
- ▶ Operational Impacts to Eagles (Humboldt Wind Energy Project Draft Environmental Impact Report (DEIR) SCH No. 201872076 – Operational Impacts to Eagles by WEST, Inc., dated September 3, 2019)
- ▶ Operational Impacts to Raptors (prepared by Stantec Consulting Services, Inc., dated August 23, 2019)

- ▶ Reclamation, Revegetation, and Weed Control Plan (prepared by Stantec Consulting Services, Inc., dated October 28, 2019)
- ▶ Summary of Collision Risk Modeling for a General Audience (prepared by Stantec Consulting Services, Inc., dated August 26, 2019)
- ▶ Supplement to Compensatory Mitigation Strategy for Marbled Murrelets (*Supplement to Compensatory Mitigation Strategy for Marbled Murrelets Impacted by Operation of the Humboldt Wind Project* by H.T. Harvey & Associates and Stantec Consulting Services, Inc., dated October 3, 2019)
- ▶ Supplement to Marbled Murrelet Habitat Assessment and Auditory and Visual Disturbance Report (*Supplement to Humboldt Wind Energy Project Marbled Murrelet Habitat Assessment and Auditory and Visual Disturbance Analysis Report* by H.T. Harvey & Associates, dated September 30, 2019)
- ▶ Updated Criteria Air Pollutant and Greenhouse Gas Emissions Calculations (October 2019)
- ▶ Updated Vegetation and Aquatic Resources Survey of Supplemental Project Areas Memo (*Updated Vegetation and Aquatic Resources Survey of Supplemental Project Areas, Humboldt County, California* by Stantec Consulting Services, Inc., dated September 9, 2019)
- ▶ Willow Flycatcher Status and Risk Evaluation for Proposed Humboldt Wind Project, Humboldt County (prepared by H. T. Harvey & Associates, dated March 4, 2019)
- ▶ Wind Availability Analysis and Location of Project (*Wind Availability Analysis and Location of Project on Monument and Bear River Ridges* by Humboldt Wind, LLC, dated September 5, 2019)

1.3 CHANGES TO THE IMPACTS CONCLUSIONS IN THE DEIR AS A RESULT OF PROJECT REVISIONS AND SUPPLEMENTAL TECHNICAL STUDIES AND ANALYSES

The proposed revisions to the project description result in a reduction of some environmental impacts relative to the analysis presented in the DEIR. However, the revisions do not result in any changes to the impact conclusions presented in the DEIR. The revisions are not considered significant new information requiring recirculation under section 15088.5 of the CEQA Guidelines.

The supplemental technical studies and resulting analyses conducted since circulation of the DEIR have resulted in more refined analyses, additional information substantiating the impacts conclusions in the DEIR, and in refined inputs to models used to predict the impacts of the proposed project. They have also filled minor data gaps and in some cases have satisfied the desire for protocol level surveys to substantiate impact conclusions. The findings of the supplemental technical studies and resulting analyses supplement the information presented in the DEIR. None of the impact conclusions in the DEIR were changed as a result of the availability and analyses of the supplemental technical information. Therefore, the supplemental technical studies are not considered significant new information requiring recirculation under section 15088.5 of the CEQA Guidelines.



Source: Stantec

Figure 1-1a Comparison of Original (DEIR) and Refined (FEIR) Project Disturbance Limits

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Source: Stantec

Figure 1-1b Comparison of Original (DEIR) and Refined (FEIR) Project Disturbance Limits

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