8  INDIVIDUAL COMMENTS AND RESPONSES

8a  INDIVIDUAL COMMENTS

This chapter provides responses to significant environmental issues raised in the comment letters received from individuals on the draft environmental impact report (DEIR) for the Humboldt Wind Energy Project, as required by California Environmental Quality Act (CEQA) Guidelines Section 15132.

The table below indicates each commenter who submitted written comments and the date of the comments. Each comment letter received is reproduced in its entirety in Appendix A. In cases where a commenter submitted the same comment letter by multiple methods (e.g., both e-mail and on the website form), the letter is numbered and bracketed only once. Revisions to the DEIR in response to comments are shown in underline and strikeout format in the responses below. These revisions are also shown in Chapter 9, “Revisions to the DEIR.”

INDIVIDUAL RESPONSES

The commenters listed in Table 8a-1 sent individual letters commenting on the DEIR. These comment letters are reproduced in Appendix A. The County’s responses to these comments are provided following the list of individual commenters.

Table 8a-1. Individual Commenters

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<td>I244</td>
<td>Chris Morrill</td>
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The commenter states that the DEIR incorrectly identifies a concrete batch plant as a cement batch plant in the second to the last project component list.

The commenter has correctly noted that the batch plant should have been referred to as a cement batch plant in the project component list. This correction has been made in Table 2-1 of Section 2.2.3, “Project Components,” in Chapter 9 of this FEIR.
The commenter has observed a large multi-megawatt machine in eastern Washington and notes how slowly the blades were turning and how the large turbine made a quiet swishing noise as a blade passed overhead and the blades were clearly visible to passing birds.

The commenter has provided an observation regarding the operation of a wind turbine. This comment does not raise specific questions or request information that pertains to the adequacy of the DEIR for addressing adverse physical impacts associated with the project, nor does it contain an argument raising significant environmental issues. No further response is required.
I3-1 The commenter states that there are no mitigation measures for eagles observed onsite, summarizes the results of the golden and bald eagle surveys provided in the DEIR, and suggests mitigation.

Section 3.5, “Biological Resources,” of the DEIR identifies and describes impacts on bald and golden eagles. Impacts 3.5-3, 3.5-4, and 3.5-5 address construction impacts on eagle nesting activity, construction impacts on foraging and nesting habitat, and overall operational impacts on bald and golden eagles, respectively. Mitigation Measure 3.5-3 (Avoid and Minimize Impacts on Nesting Eagles) and Mitigation Measures 3.5-5a (Avoid, Minimize, and Compensate for Operational Impacts on Eagles), 3.5-5b (Conduct Postconstruction Mortality Monitoring for Eagles), and 3.5-5c (Implement Compensatory Mitigation to Offset Operational Impacts on Eagles) of the DEIR describe measures to reduce impacts to bald and golden eagles, including eagles currently onsite. Please also see Master Response 6, “Eagles and Other Raptors,” for further discussion of additional surveys conducted since circulation of the DEIR and for additional refinements to the mitigation measures in the DEIR.
The commenter states that Alternative 5 provides the best consideration of natural and cultural resources and suggests that Alternative 5 include provisions in Alternative 2 that avoid the underground crossing of Eel River and use an alternate road alignment.

The commenter expresses the opinion that Alternative 5 should include provisions provided in Alternative 2. This comment does not raise specific questions or request information that pertains to the adequacy of the DEIR for addressing adverse physical impacts associated with the project, nor does it contain an argument raising significant environmental issues. However, this comment is published in this Response to Comments document for public disclosure and for decision maker consideration.

Please also see Master Response 12, “Alternatives Considered,” which addresses the alternatives identified and considered for the proposed project. Please also note that since circulation of the DEIR, the project description has been refined and no longer includes an underground crossing of Eel River and also includes the alternative road alignment. Please see “Refinements to the Project Description Since Circulation of the DEIR” in Chapter 1 of this FEIR for a summary of the refinements that have been incorporated.
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<th>Letter 15 Response</th>
<th>Ken Miller</th>
<th>May 4, 2019</th>
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15-1 *The commenter asks if the County will receive $25 million over 10 years in taxes for the project plus around $7 million more in local revenues from construction activities.*

The commenter asks a question regarding taxes and local revenue. The purpose of the DEIR is to identify the significant effects of the proposed project on the physical environment and the DEIR is not intended to address social or economic impacts. This is consistent with CEQA guidelines stating that “An economic or social change by itself shall not be considered a significant effect on the environment” (CEQA Guidelines Sections 15131 and 15382). No further response is required.
The commenter states that the DEIR does not discuss the foothill yellow-legged frog and the commenter is concerned that the project will disrupt their reproduction and cause a decrease in species yield resulting in a disruption of the food chain and resulting in a negative effect on the ecosystem.

Section 3.5.1, “Environmental Setting,” in Section 3.5 of the DEIR discusses the potential for foothill yellow-legged frogs to occur on the project site. Impact 3.5-21 in Section 3.5 addresses impacts to foothill yellow-legged frogs as part of the analysis of impacts on special-status amphibians and reptiles. Mitigation Measures 3.5-21a (Avoid and Minimize Impacts on Aquatic, Riparian, and Upland Habitats), 3.5-21b (Avoid and Minimize Impacts on Special-Status Amphibians and Reptiles), and 3.5-21c (Develop and Implement a Preconstruction Survey Plan for Special-Status Amphibians and Reptiles) describe measures to reduce impacts to special-status amphibians and reptiles, including foothill yellow-legged frog. Mitigation Measure 3.5-21d (Avoid and Minimize Impacts on Foothill Yellow-Legged Frog) provides specific mitigation measures to reduce impacts to foothill yellow-legged frog by conducting pre-construction surveys and by implementing avoidance and minimization measures if foothill yellow-legged frogs are detected during surveys.
17-1 The commenter states that the FEIR should consider how often marbled murrelets fly over ridges.

Please see Master Response 2, “Marbled Murrelet,” which describes the results of the Humboldt Wind Energy Project Marbled Murrelet Radar Survey Report – Year 2. The full report is included in Appendix B of this FEIR.

17-2 The commenter states that the EIR should consider other possible environmental impacts from renewable energy projects that would replace the power availability of this wind project if it were not built.

The DEIR’s alternatives analysis meets the CEQA requirements. As stated in Chapter 6, “Alternatives,” of the DEIR, each alternative was evaluated according to the “rule of reason” and general feasibility criteria suggested by the State CEQA Guidelines Section 15126.6, as follows:

“The range of alternatives required in an EIR is governed by a ‘rule of reason’ that requires the EIR to set forth only those alternatives necessary to permit a reasoned choice. The alternatives shall be limited to ones that would avoid or substantially lessen any of the significant effects of the project. Of those alternatives, the EIR need examine in detail only the ones that the lead agency determines could feasibly attain most of the basic objectives of the project. The range of feasible alternatives shall be selected and discussed in a manner to foster meaningful public participation and informed decision making.”

The County has considered a range of alternatives that could feasibly attain most of the basic project objectives identified in Section 2.2.2, “Project Objectives,” of Chapter 2, “Project Description,” and avoid or substantially lessen one or more significant effects. Please also see Master Response 12, “Alternatives,” for further discussion.
The commenter expresses concern regarding “light pollution,” which the commenter indicates may be minimized by installing only those lights mandated by the FAA.

Please see the responses to Comments R3-8, R3-9, R3-10, and R3-18, which address light pollution and the installation of lights mandated by the FAA.
The commenter asks where the DEIR addresses tax revenues to the County, asks if Terra Gen has contracts for the power generated, and what herbicide will be used to control vegetation in the transmission line corridor.

The purpose of this DEIR is to identify the significant effects of the proposed project on the physical environment and this DEIR is not intended to address social or economic impacts. “An economic or social change by itself shall not be considered a significant effect on the environment” (CEQA Guidelines Sections 15131 and 15382). Therefore, the tax revenues collected by the County from operation of the proposed project are not considered in the DEIR.

Energy generated by the proposed project would be distributed by Pacific Gas and Electric Company (PG&E) via an interconnection with PG&E’s transmission grid at the Bridgeville Substation. PG&E is an independent system operator that sells energy in the California utility market, which is operated by the California Independent System Operator (CAISO).

Mitigation Measure 3.5-23e (Develop and Submit a Reclamation, Revegetation, and Weed Control Plan) in Section 3.5 of the DEIR addresses the management of noxious weeds during construction and operation of the proposed project. The Reclamation, Revegetation, and Weed Control Plan, which is provided as Appendix B of this FEIR, does not explicitly prescribe which herbicides might be used, but notes that all treatment methods for control of weeds—including the use of herbicides—will be conducted in accordance with the law, regulations, and policies governing the landowner where the treatment will occur.
The commenter opposes the proposed project, citing a variety of concerns, including health issues, bird mortality, and effects to redwoods associated with noise frequencies generated by turbine noise. The commenter states these conclusions are supported by recently published peer-reviewed information prepared by medical doctors, pathologists, engineers, and the research of Dr. Nina Pierpont.

The comment letter does not provide specific references to published peer reviewed studies. CEQA does not require a lead agency to conduct every test or perform all research, study, and experimentation recommended or demanded by commenters. In reviewing draft EIRs, persons and public agencies should focus on the sufficiency of the document in identifying and analyzing the possible impacts on the environment and ways in which the significant effects of the project might be avoided or mitigated (CEQA Guidelines Section 15204).

An EIR is not inadequate simply because experts in a particular environmental subject matter dispute the conclusions reached by the experts whose studies were used in drafting the EIR, even where different conclusions can reasonably be drawn from a single pool of information. (CEQA Guidelines Section 15151, Guide to the California Environmental Quality Act [CEQA] [Remy et al. 2007:499–500]; Greenebaum v. City of Los Angeles [1984] 153 Cal. App. 3d 391, 413.) Perfection is not required, but the EIR must be adequate, complete, and a good faith effort at full disclosure (CEQA Guidelines Section 15151). The DEIR for the proposed project provides an adequate, complete, and good faith effort at full disclosure of the physical environmental impacts and the conclusions are based upon substantial evidence in light of the whole record. No further response is required.
The commenter opposes the project because it would reduce the value of her property. The commenter states that the location of project was chosen because of its low economic value and low community involvement. The commenter states that the town of Scotia cannot support the traffic produced by the project’s workers and expresses concern that the project applicant does not care for the community and its workers. The commenter mentions that there will be negative publicity for the project in relation to the heroin epidemic in Humboldt County. The commenter believes the project would destroy the town of Scotia and would hurt the real estate market.

The commenter expresses opposition to the proposed project. This comment is not directed at the adequacy of the DEIR for addressing adverse physical impacts associated with the project, nor does it contain an argument raising significant environmental issues. However, this comment is published in this Response to Comments document for public disclosure and for decision maker consideration.

The commenter expresses the opinion that the proposed project would have numerous effects on residents, workers, and homeowners in Scotia and impact home sales. The purpose of this DEIR is to identify the significant effects of the proposed project on the physical environment and this DEIR is not intended to address social or economic impacts. “An economic or social change by itself shall not be considered a significant effect on the environment” (CEQA Guidelines Sections 15131 and 15382).

The commenter proposes an alternative project location near Petrolia.

Please see the response to Comment I7-2 and Master Response 12, “Alternatives,” for a discussion of the alternatives considered.

The commenter expresses concern regarding overall CO2 reduction from cutting down the trees versus CO2 reduction from the wind farm.

Please see Master Response 10, “Greenhouse Gas Emissions,” which addresses the adequacy of the greenhouse gas analysis and the relationship between carbon dioxide emissions associated with the project and the amount of forest loss on the project site. In addition, since circulation of the DEIR, the project applicant has refined and narrowed the footprint of the proposed project to further avoid or minimize impacts. Please see Chapter 9 of this FEIR for specific refinements to the project description.

The commenter further expresses opposition to the project and reiterates that an alternative location for the project in a less populated area of Humboldt would be ideal. The commenter summarizes her comments in one sentence, stating “once the old growth and endangered species are gone they are gone forever.”

The commenter expresses further opposition to the proposed project. The commenter states that the project is being fast tracked by the County. Please see Master Response 1, “Site Planning and Avoidance Measures,” for further information on the history and siting of the proposed project. The County has also provided multiple opportunities for public comment over the course of this environmental review process, which began on July 3, 2018, and more will be offered when the project is considered by the Planning
Commission at a public hearing. Please see the response to Comment I25-1, which describes the extensive public noticing and public review period for the DEIR.
The commenter states that nighttime light fixtures for the wind turbines will have a significant impact on the viewshed of neighbors and other scenic points, and requests photographic documentation of where the lights will be located. The commenter also states that because the project has a significant impact, CEQA requires mitigation efforts to be made, but there are no mitigation efforts in the DEIR.

The description of aesthetic resources presented in Section 3.2, “Aesthetics,” of the DEIR is thorough and adequate and meets CEQA requirements for describing the existing aesthetic and visual conditions in the project area. Key observation points shown in Figure 3.2-1 were selected to illustrate the range of visual settings and visual sensitivity and represent the most likely locations from which the project site would be viewed. Figures 3.2-2 through 3.2-10 provide representative photographs showing views of the project site.

There is no requirement in CEQA statutes or guidelines that an EIR include a certain number of types of photographs or photo simulations showing existing views or proposed project facilities. However, Figures 3.2-2 through 3.2-10 in Section 3.2 of the DEIR provide simulated views of the project from each key observation point and compare those to existing views. Figures 3.2-11 through 3.2-19 show enlarged versions of the visual simulations. Table 3.2-3 shows an estimate of the number of air traffic safety lights that could be visible from each key observation point, based on hubs visible in simulations. As discussed in Impact 3.2-3 of the DEIR, feasible mitigation to reduce the impact associated with light and glare does not currently exist and therefore cannot be proposed. Please also see the response to Comment R3-18 regarding nighttime light and glare.

In addition, the project applicant has refined and narrowed the footprint of the proposed project to further avoid or minimize impacts since circulation of the DEIR. Since the publication of the DEIR, the applicant has proposed a reduction in the number of wind turbine generators from 60 to 47, spread across Monument Ridge and Bear River Ridge. Please see Chapter 9 of this FEIR for specific refinements to the project description.

The commenter states that there is no mention of the number of old-growth redwood trees or the acreage of old-growth redwood stands located in the project site. The commenter notes that other projects “have been stopped” because of similar effects.

As described in Section 3.5 (DEIR page 3.5-73), project construction will not result in the removal of any old-growth redwood trees or stands or other mature coniferous forest that could support nesting marbled murrelets. In addition, since circulation of the DEIR, the project applicant has refined and narrowed the footprint of the proposed project to further avoid or minimize impacts, including impacts associated with tree removal. Please see “Refinements to the Project Description Since Circulation of the DEIR” in Chapter 1 of this FEIR for the specific refinements that have been made to the project description.
The commenter believes that the project should be built despite potential adverse impacts to listed species because of its reduction in the generation of carbon dioxide emissions and that this indirect impact will be beneficial to the species because of the slowed impacts of climate change. The commenter further states that the project may be a catalyst to slowing changes in climate enough to give these species a fighting chance to adapt to the new environment.

The commenter expresses the opinion that the proposed project could have indirect beneficial impacts on listed species because of the potential reduction of carbon dioxide emissions. This comment is not directed at the adequacy of the DEIR for addressing adverse physical impacts associated with the project, nor does it contain an argument raising significant environmental issues. No further response is required.
I14-1 The commenter is opposed to the installation of wind turbines in Scotia.

The commenter expresses opposition to the proposed project. This comment does not raise specific questions or request information that pertains to the adequacy of the DEIR for addressing adverse physical impacts associated with the project, nor does it contain an argument raising significant environmental issues. No further response is required.
115-1 The commenter states that the DEIR does not seem to consider how important the Humboldt area is to avian species and indicates that the proposed project should be not move forward unless “every danger to avian species can be guaranteed to be mitigated or minimized to Less than Significant.”

The DEIR includes numerous mitigation measures designed to minimize, reduce, or avoid each identified potentially significant impact whenever it is feasible to do so where potentially significant impacts are identified (CEQA Section 21002.1(b) and CEQA Guidelines Section 15126.4). An EIR should focus on mitigation measures that are feasible, practical, and effective (Napa Citizens for Honest Govt. v. Napa County Bd. of Supervisors (2001) 91 Cal.App.4th 342, 360).

When a lead agency approves a project that would result in significant and unavoidable impacts (i.e., cannot be reduced to a less-than-significant level) that are disclosed in the EIR, CEQA requires the decision-making body to balance the economic, legal, social, technological, or other benefits of the proposed project against its unavoidable environmental risks and state in writing its reasons for supporting the action (CEQA Guidelines Sections 15093). This statement of overriding considerations must be supported by substantial information in the record. The County may approve the project even though the project would cause a significant effect on the environment if the County makes a fully informed and publicly disclosed decision that shows there is no feasible way to lessen or avoid the significant effect and identifies how the expected benefits from the project outweigh the significant and unavoidable environmental impacts of the project (CEQA Guidelines Section 15043).

Additional information related to impacts on avian species are presented in Master Responses 2, 3, 5, and 6 of this FEIR. In addition, since circulation of the DEIR, the project applicant has refined and narrowed the footprint of the proposed project to further avoid or minimize impacts, including impacts associated with birds. Please see “Refinements to the Project Description Since Circulation of the DEIR” in Chapter 1 of this FEIR for the specific refinements that have been made to the project description.
The commenter indicates that as a student of environmental science, the commenter understands the necessity and importance of renewable energy to fight climate change. The commenter requests a longer study on marbled murrelets and asks that the project find a proper mitigation effort that would not allow for the loss of any threatened or endangered avian species.

Please see Master Response 2, “Marbled Murrelet,” for a description of the updated “Humboldt Wind Energy Project Marbled Murrelet Survey Report,” which is also included in Appendix B of this FEIR. Please also see Master Response 5, “Migratory and Special-status Birds,” and Master Response 6, “Bald and Golden Eagles,” for additional information on bird impacts and mitigation, refined since circulation of the DEIR.
The commenter believes the proposed project should move forward partially because oil companies may not be able to supply global demand.

The commenter expresses support for the project. This comment does not raise specific questions or request information that pertains to the adequacy of the DEIR for addressing adverse physical impacts associated with the project, nor does it contain an argument raising significant environmental issues. No further response is required.

The commenter expresses concern regarding potential adverse impacts to northern spotted owls and the loss of functional habitat. The commenter states that they could not find much data on the NSO habitat loss thresholds in the DEIR and suggests including more data and mitigating the potential impact on northern spotted owls.

Please see Master Response 4, “Northern Spotted Owl,” which describes northern spotted owl survey methodology, surveys conducted since circulation of the DEIR, analysis of impacts on activity centers, and refined mitigation measures. In addition, since circulation of the DEIR, the applicant has revised the gen-tie alignment to completely avoid all northern spotted owl activity centers and to avoid nesting and roosting habitat to the maximum extent possible. Please see “Refinements to the Project Description Since Circulation of the DEIR” in Chapter 1 of this FEIR for the specific refinements that have been made to the project description.
118-1 The commenter states that they live in the area because of its natural beauty and that views would be adversely affected by the project without any real local benefit. The commenter further expresses the opinion that the project is a terrible idea.

The commenter expresses opposition to the proposed project. This comment does not raise specific questions or request information that pertains to the adequacy of the DEIR for addressing adverse physical impacts associated with the project, nor does it contain an argument raising significant environmental issues. However, this comment is published in this Response to Comments document for public disclosure and for decision maker consideration. Please also see the response to Comment I12-1. No further response is required.
119-1 The commenter urges the County to abandon the project. The commenter expresses the opinion that a similar project installed on Bunchgrass Ridge near Burney has destroyed the natural beauty of the area while greatly reducing access to the surrounding forest for recreational use.

The commenter has provided an opinion regarding the effects of a similar wind turbine project on the natural beauty of the area and recreational access. This comment does not raise specific questions or request information that pertains to the adequacy of the DEIR for addressing adverse physical impacts associated with the project, nor does it contain an argument raising significant environmental issues. No further response is required.
120-1 The commenter supports renewable energy sources but opposes the project. The commenter states that the towers would be seen for miles and would spoil the natural beauty of this pristine wilderness area. The commenter further states that the concrete pads that the towers sit on would have a permanent detrimental impact on this delicate ecosystem.

The commenter expresses opposition to the proposed project. This comment does not raise specific questions or request information that pertains to the adequacy of the DEIR for addressing adverse physical impacts associated with the project. However, this comment is published in this Response to Comments document for public disclosure and for decision maker consideration. No further response is required.

Please also see the response to Comment I12-1, related to views of the project site.
The commenter is opposed to the proposed project, partially because of its location and what the commenter perceives is an “insignificant percentage” of power generated that would be available for use in the county. The commenter states that Terra-Gen is interested in rapidly acquiring permitting to transform a uniquely valuable local mountain range in order to consolidate grid leverage and build their position in the electric power business in California. The commenter recommends that Terra-Gen leave Monument Ridge as it is and apply its project goal to that alternate site.

Energy generated by the proposed project would be distributed by PG&E via an interconnection with PG&E’s transmission grid at the Bridgeville Substation. PG&E is a public utility operator that sells energy in the California utility market, which is operated by California Independent System Operator (CAISO). CAISO is a nonprofit independent system operator serving California. It oversees the operation of California’s bulk electric power system, transmission lines, and electricity market generated and transmitted by its member utilities.

In California, all generators are required to participate in the CAISO Interconnection Study Process (ISP) in order to connect to the transmission grid. Interconnection studies evaluate proposed interconnections with the CAISO grid and are performed based upon the CAISO tariff and in coordination with the applicable participating transmission owners. They include study reports, resource adequacy deliverability studies and options, impacts on affected (neighboring) systems, and the relationship between generation interconnection and the CAISO’s transmission planning process. CAISO controls the transmission system to ensure that electric generation matches demand and that the loads on the system are balanced.

CAISO operates under the terms and conditions of its Federal Energy Regulatory Commission-approved tariff. The CAISO ISP ensures an orderly process for generators to connect to the transmission grid. Information from the ISP is often used by developers to research segments of the transmission system with available capacity. The ISP ensures that developers, CAISO, and transmission line owners are working together to meet all CAISO requirements for reliability, power flow, and capacity considerations.

This comment does not raise specific questions or request information that pertains to the adequacy of the DEIR for addressing adverse physical impacts associated with the project. However, this comment is published in this Response to Comments document for public disclosure and for decision maker consideration. No further response is required.
I22-1 The commenters states that a letter was submitted on October 29, 2018 addressing their concerns regarding the placement of wind turbines near their property. The commenter states that they reviewed the DEIR and provided additional concerns.

The responses to comments submitted by the commenter in this letter dated May 20, 2019 are provided herein.

I22-2 The commenters are concerned about the negative impacts of turbine placement with regard to the placement of turbines too close to their property. The commenters also state that the proposed project will affect their ability to travel to and from their ranch for normal livestock management activities, and that there are no mitigation measures in the DEIR to address this issue.

Please see the response to Comment I22-3 regarding the placement of wind turbines. The project will not alter access to private properties that are not part of the lease agreements and will not prevent access to public roads. No changes to the analysis in the DEIR are necessary.

I22-3 The commenters state their concern regarding the placement of turbines on the ridge line southwest of their ranch house and that there appear to be three turbines in the immediate view. The commenters further describe how turbine strobe lighting could affect them.

The project applicant has refined and narrowed the footprint of the proposed project to further avoid or minimize impacts since circulation of the DEIR. Since the publication of the DEIR, the applicant has proposed a reduction in the number of wind turbine generators from 60 to 47, spread across Monument Ridge and Bear River Ridge. Please see Chapter 9 of this FEIR for specific refinements to the project description, including a map showing refined turbine locations.

I22-4 The commenters state that they met with Terra Gen personnel on their property and were promised images that would illustrate how the turbines would appear from the rear porch of their ranch house. The commenters state that the images were never provided and express a concern over light pollution.

Please see the responses to Comments R3-8, R3-9, R3-10, R3-18, and I12-1, which address views of the project site and lighting. The County does not have influence on the coordination of local landowners with Terra-Gen. Please review the refinements to the project description in Chapter 9 of this FEIR for refined turbine locations.

I22-5 The commenters summarize their concerns as presented in the comment letter.

The responses to comments submitted by the commenters in this letter are provided herein.

I22-6 The commenters state that they are anticipating an approved Timber Harvest Plan in 2019 and express their concern over their ability to deliver logs to the mill.

This comment does not raise specific questions or request information regarding the timber harvest plan. The proposed project does not include changes to roads currently accessible by landowners or by the
public. Prior to project construction, the applicant will prepare a traffic management plan that will
describe how local traffic will be managed to not interfere with regular traffic patterns during
construction. Therefore, the project will not interfere with planned timber harvest by adjacent landowners.
No further analysis is required.

I22-7  The commenters would like the above-mentioned concerns to be addressed in the final EIR.

Please refer to the responses to Comments I22-2, I22-3, and I22-4, which discuss how the commenters’
concerns are addressed in this FEIR.
The commenter states that the “perpetrators” of the proposed project do not care if the Eel River is ruined, if trees are removed, or if the project creates an eyesore. The commenter also states that placing the proposed project in the redwoods poses a threat of wildfire similar to the Camp Fire.

The commenter expresses opposition to the proposed project. This comment does not raise specific questions or request information that pertains to the adequacy of the DEIR for addressing adverse physical impacts associated with the project. However, this comment is published in this Response to Comments document for public disclosure and for decision maker consideration.

Please see Master Response 1, “Site Planning and Avoidance Measures,” for further information on the siting of the proposed project and Master Response 11, “Wildfire,” for further discussion of regulatory requirements and measures that reduce the potential for wildfires.
124-1  The commenter opposes the destruction of sacred lands and does not condone any project that does not benefit the rural area. The commenter further states that the County should not outsource its resources to companies that are going to send the power out of the area.

The commenter expresses opposition to the proposed project. This comment does not raise specific questions or request information that pertains to the adequacy of the DEIR for addressing adverse physical impacts associated with the project. However, this comment is published in this Response to Comments document for public disclosure and for decision maker consideration. Please also see the response to Comment 121-1.
The commenter states that the review period for the DEIR should be extended, and that Humboldt Wind did not provide adequate public notice of the project. The commenter states that the project would cause erosion during heavy rains, the facilities would be “an eyesore,” and the project is located in a seismically active zone and requires clear cutting for the transmission line.

Multiple opportunities for public comment have been provided over the course of the environmental review process and more will be offered when the project is considered by the Planning Commission at a public hearing.

The first opportunity for public input was during the scoping period. On July 31, 2018, the County issued a notice of preparation (NOP) to inform agencies and the general public that an EIR was being prepared. The County invited comments on the scope and content of the document and participation at two public scoping meetings. The NOP was filed with the State Clearinghouse, posted with the County Clerk, and mailed to property owners adjacent to the project boundary and to 13 state agencies. It was also posted on the County’s website for a 30-day comment period.

The County held two public scoping meetings to solicit input from the community and public agencies. The meetings were held on Tuesday, August 14, 2018, at the Sequoia Conference Center in Eureka, California, and on Wednesday, August 15, 2018, at the Winema Theater in Scotia, California. The purpose was to solicit input on the scope and content of the DEIR, including suggested alternatives and mitigation measures.

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.

Another opportunity for public comment was provided during the public review period for the DEIR. In accordance with Public Resources Code Section 21091 and CEQA Guidelines Section 15087, a 45-day public review period for the DEIR began April 15, 2019. There is no statute or case law that requires the extension of the public comment period on request. Rather, the decision regarding whether to extend the public review period is at the discretion of the decision-making agency. Humboldt County, as the decision-making agency for the proposed project, extended the public review period an additional 15 days, for a total of 60 days, to June 1 to provide additional time to review the documents. The public can also provide comments during hearings before the County planning commission.

Since circulation of the DEIR, the project applicant has updated the project description and refined the footprint of the proposed project to avoid or minimize impacts. Please see Chapter 9 of this FEIR for specific refinements to the project description. Please see the responses to Comment I12-1, related to
views of the proposed project, and also see the responses to Comments R3-22, R3-23, and R3-26, which address soils and erosion.
126-1 The commenter states that people live in Humboldt County because of the trees, that this is a fragile ecosystem, and that the project will not benefit Humboldt County.

The commenter expresses opposition to the proposed project. This comment does not raise specific questions or request information that pertains to the adequacy of the DEIR for addressing adverse physical impacts associated with the project. However, this comment is published in this Response to Comments document for public disclosure. No further response is required.
The commenter expresses opposition to the proposed project. This comment does not raise specific questions or request information that pertains to the adequacy of the DEIR for addressing adverse physical impacts associated with the project. However, this comment is published in this Response to Comments document for public disclosure. No further response is required.
The commenter thanks the County for considering wind turbines.

The commenter expresses support for the proposed project. This comment does not raise specific questions or request information that pertains to the adequacy of the DEIR for addressing adverse physical impacts associated with the project. No further response is required.
The commenter expresses objection to the proposed project. The commenter further states that one of the principal ways to save the planet is from greenhouse gases and escalating temperatures is reforestation, not deforestation as proposed by the project.

The commenter expresses opposition to the proposed project. This comment does not raise specific questions or request information that pertains to the adequacy of the DEIR for addressing adverse physical impacts associated with the project. Please see Master Response 10, “Greenhouse Gas Emissions,” which addresses the relationship between greenhouse gas emissions associated with the project and the amount of forest loss on the project site. No further response is required.
I30-1 The commenter is opposed to the proposed project and states that the County is attempting to fast track this project due to the proposed increased tax revenue. The commenter disagrees with siting of the proposed project in Humboldt County and states that the project will not be good for tourism. The commenter also states that the turbines will cause serious destruction to birds and the natural environment in general and that the turbines will be a blight on the landscape and the blinking red lights will block views of the stars. The further states that proposed project is already outdated technology and that the turbines will be detrimental to the long-term well-being of Rio Dell and Scotia and those economies.

The commenter expresses opposition to the proposed project and expresses the opinion that the proposed project is outdated technology, will affect tourism, and be detrimental to Rio Dell’s and Scotia’s wellbeing and economies. This comment does not raise specific questions or request information that pertains to the adequacy of the DEIR for addressing adverse physical impacts associated with the project.

Please see Master Response 1, “Site Planning and Avoidance Measures,” for further information on the siting of the proposed project and please see the responses to Comments R3-8, R3-9, R3-10, R3-18, and I12-1, which address views of the project site and light pollution. Please see the response to Comment I25-1, which describes the extensive public notice and public review period for the DEIR. Since circulation of the DEIR, the project applicant has refined and narrowed the footprint of the proposed project to further avoid or minimize impacts, including impacts associated with wildlife. Please see Chapter 9 of this FEIR for specific refinements to the project description.

In addition, the purpose of this DEIR is to identify the significant effects of the proposed project on the physical environment and this DEIR is not intended to address social or economic impacts. “An economic or social change by itself shall not be considered a significant effect on the environment” (CEQA Guidelines Sections 15131 and 15382).
131-1  *The commenter is opposed to the proposed project due to a perceived reduction in property values and ecosystem damages.*

The purpose of this DEIR is to identify the significant effects of the proposed project on the physical environment and this DEIR is not intended to address social or economic impacts. “An economic or social change by itself shall not be considered a significant effect on the environment” (CEQA Guidelines Sections 15131 and 15382). No further response is required.
I32-1  The commenter requests financial information on the proposed project to determine its feasibility.

The commenter requests financial information. The purpose of this DEIR is to identify the significant effects of the proposed project on the physical environment and this DEIR is not intended to address social or economic impacts. “An economic or social change by itself shall not be considered a significant effect on the environment” (CEQA Guidelines Sections 15131 and 15382). No further response is required.

I32-2  The commenter supports the No Project Alternative, states the project is unsuitable for Humboldt County, lists two alternative locations, and is concerned that the natural beauty of Humboldt will be affected.

The commenter expresses support for the No Project Alternative. Please see Master Response 1, “Site Planning and Avoidance Measures,” for further information on the siting of the proposed project.

I32-3  The commenter states the document is poorly crafted and does not enable readers to gain a true understanding of the aesthetic impact.

Please also see the responses to Comments R3-8, R3-9, R3-10, R3-18, and I12-1, which address views of the project site and lighting. In addition, since circulation of the DEIR, the project applicant has refined and narrowed the footprint of the proposed project to further avoid or minimize impacts. Since the publication of the DEIR, the applicant has proposed a reduction in the number of wind turbine generators from 60 to 47, spread across Monument Ridge and Bear River Ridge. Please see Chapter 9 of this FEIR for specific refinements to the project description.

I32-4  The commenter states that the effects on forest resources is highly significant based on the amount of timber to be harvested and that the impact discussion does not capture the importance of this area for endangered species. The commenter further states that there is no calculation of greenhouse gases that would be released during the logging phase.

Please see Master Response 10, “Greenhouse Gas Emissions,” which discusses timber harvest and the adequacy of the greenhouse gas analysis.

I32-5  The commenter states that the proposed project location has the most species of concern than any other location in California, including marbled murrelet, northern spotted owl, willow flycatcher, western yellow billed cuckoo, and bald eagle. The commenter states that removal of habitat and disturbances to wildlife pose significant irremediable impacts to wildlife. The commenter summarizes the impacts identified in Section 3.5, pages 3.5-69 to 3.5-190 of the DEIR, and states that the impacts are unacceptable.

Additional information related to impacts and mitigation measures for wildlife species cited by the commenter (i.e., marbled murrelet, northern spotted owl, migratory and special status birds, and eagles and other raptors) are presented in Master Responses 2, 3, 5, and 6 of this FEIR. In addition, numerous
additional studies have been conducted since publication of the DEIR, and these studies are provided as attachments to this FEIR in Appendix C.

I32-6 The commenter expresses concern that the Bear River Ridge portion of the project is the Wiyot Tribe’s sacred high place and that there is no feasible mitigation for cultural resources.

Please see the responses to Comments in Letter T2 in Chapter 6, “Tribal Comments and Responses,” of this FEIR for specific responses to comments submitted by the Wiyot Tribe.

I32-7 The commenter states that the renewable energy generated from the project will be minimal and will require Humboldt County to buy their energy from the grid.

Please see the response to Comment I21-1 regarding energy generation and distribution.

I32-8 The commenter expresses concerns about greenhouse gases, their potential impacts on the environment, and that there are no mitigations or/and minimizations offered.

Please see Master Response 10, “Greenhouse Gas Emissions,” which discusses the adequacy of the greenhouse gas analysis.

I32-9 The commenter states that an increase in traffic during project construction will create a traffic and emissions nightmare. The commenter could not find the duration of the construction phase in the document.

As stated in Section 2.3 in Chapter 2 of the DEIR, construction would last 12–18 months. A construction traffic management plan must be prepared as a condition of the project. That plan would identify haul routes, construction worker traffic patterns, and detour routes for implementation during the transportation of heavy project components. Mitigation measures identified in Section 3.12, “Transportation and Traffic,” of the DEIR require the construction contractor to obtain Caltrans permits for wide and heavy loads.

I32-10 The commenter states the project is unacceptable and states that the No Project Alternative should be selected. The commenter summarizes the impacts they consider real, not potential, which include impacts to wildlife, noise, and traffic, and states that the project is being rushed to benefit the developer.

The summary of impacts provided by the commenter does not raise specific questions or request information that pertains to the adequacy of the DEIR. The commenter states the project is being rushed for the benefit of the developer. Please see Master Response 1 for further information on the history and siting of the proposed project. The County has also provided multiple opportunities for public comment over the course of this environmental review process, which began on July 3, 2018, and more will be offered when the project is considered by the Planning Commission at a public hearing. Please see the response to Comment I25-1, which describes the extensive public noticing and public review period for the DEIR.
The commenter expresses opposition to the proposed project. The commenter asks about the responsibility and legal ramifications of a fire started by the turbines.

The commenter asks a question regarding legal liability associated with potential fires. The purpose of this DEIR is to identify the significant effects of the proposed project on the physical environment and this DEIR is not intended to address social or economic impacts. “An economic or social change by itself shall not be considered a significant effect on the environment” (CEQA Guidelines Sections 15131 and 15382). No further response is required.
The commenter expresses opposition to the proposed project. The commenter states that energy produced by the project will not be used in the county. The commenter states that other turbine projects have contributed to spreading fire, that the project could cause an increased risk of fire, and that the local fire departments are not equipped to address potential fires caused by the project. The commenter also states that the project has been rushed through a brief public comment period and partially-run environmental studies that do not include year-round data. The commenter further states that the project is motivated by tax breaks.

This comment does not raise specific questions or request information that pertains to the adequacy of the DEIR for addressing adverse physical impacts associated with the project. Please see the response to Comment I21-1 regarding energy generation and distribution. The response to Comment I25-1 provides a summary of public noticing and public review of the DEIR. Please see Master Response 11, “Wildfire,” for further discussion of regulatory requirements and mitigation measures that reduce the potential for wildfires and Section 3.13, “Fire Protection Services and Wildfire Hazards,” of the DEIR, which provides information related to firefighting capabilities and readiness. In addition, numerous additional studies have been conducted since publication of the DEIR, and these studies are provided in Appendix B of this FEIR.

The commenter asks a question regarding taxes breaks. The purpose of this DEIR is to identify the significant effects of the proposed project on the physical environment and this DEIR is not intended to address social or economic impacts. “An economic or social change by itself shall not be considered a significant effect on the environment” (CEQA Guidelines Sections 15131 and 15382).
The commenter is opposed to the proposed project, partially because of the location and what the commenter perceives is an “insignificant percentage” of power generated that would be available for use in the county. The commenter states that Terra-Gen is interested in rapidly acquiring permitting to transform a uniquely valuable local mountain range in order to consolidate grid leverage and build their position in the electric power business in California. The commenter recommends that Terra-Gen leave Monument Ridge as it is and apply its project goal to that alternate site.

Please see the response to Comment letter I21.
The commenter states that the proposed project offers few benefits to Humboldt County and that Terra-Gen would benefit from sizable tax breaks. The commenter states that the project would destroy forest lands, scenic beauty, and wildlife. The commenter is in favor of installing solar panels on private residences in Humboldt County instead of the proposed project, and states that solar installations would cause no harm to the environment or require permits and new road construction.

The commenter expresses opposition to the proposed project. The commenter further expresses the opinion that the cost of installation of the proposed project could be used instead for solar panel installation on private homes, which would result in greater benefits than what the proposed project would provide. This comment does not raise specific questions or request information that pertains to the adequacy of the DEIR for addressing adverse physical impacts associated with the project. However, this comment is published in this Response to Comments document for public disclosure and for decision maker consideration. Please also see the response to Comment I21-1. No further response is required.

The commenter asks a question regarding tax breaks. The purpose of this DEIR is to identify the significant effects of the proposed project on the physical environment and this DEIR is not intended to address social or economic impacts. “An economic or social change by itself shall not be considered a significant effect on the environment” (CEQA Guidelines Sections 15131 and 15382).
The commenter expresses opposition to the proposed project and opposes any Humboldt County public official who supports the proposed project. This comment does not raise specific questions or request information that pertains to the adequacy of the DEIR for addressing adverse physical impacts associated with the project. However, this comment is published in this Response to Comments document for public disclosure and for decision maker consideration. Please also see the response to Comment I41-1. No further response is required.
138-1 The commenter expresses concern over the proposed project and the location of the project. The commenter expresses concern that the DEIR does not address wildland fires caused by wind turbines. The commenter provides information on how wind turbines can cause wildland fires. The commenter expresses concern that there are no mitigation measures that address fire suppression equipment on the turbines. The commenter provides examples of wind turbine fires and expresses concern that the project would be located in a redwood forest. The commenter states that the small towns the project would affect are not capable of handling large wildfires.

Please see Master Response 11, “Wildfire,” which discusses the potential risk of wildfire from overhead power transmission lines; summarizes recent CPUC rulings on power transmission; describes federal and state laws related to the generation and distribution of energy, including requirements identified in the California Public Resources Code; and identifies revisions to Mitigation Measure 3.13-2a to further reduce the risk of wildfires. Section 3.13 of the DEIR provides information related to firefighting capabilities and readiness.
139-1 The commenter expresses opposition to the proposed project, encourages solar power, and expresses concern regarding the project’s potential negative impacts on the environment, which would occur just to benefit a corporation by way of tax credits.

The commenter expresses opposition to the proposed project and encourages solar power. This comment does not raise specific questions or request information that pertains to the adequacy of the DEIR for addressing adverse physical impacts associated with the project. However, this comment is published in this Response to Comments document for public disclosure and for decision maker consideration.

The commenter asks a question regarding tax credits. The purpose of this DEIR is to identify the significant effects of the proposed project on the physical environment and this DEIR is not intended to address social or economic impacts. “An economic or social change by itself shall not be considered a significant effect on the environment” (CEQA Guidelines Sections 15131 and 15382).
140-1 The commenter expresses opposition to the proposed project and supports solar power. The commenter states there will be impacts to birds, visual resources, forests, and coastal prairie grasslands. The commenter also expresses concerns over the project’s effects on property value.

The commenter expresses opposition to the proposed project and supports solar power. This comment does not raise specific questions or request information that pertains to the adequacy of the DEIR for addressing adverse physical impacts associated with the project. However, this comment is published in this Response to Comments document for public disclosure and for decision maker consideration. Please also see the responses to Comments R3-8, R3-9, R3-10, R3-18, and I12-1, which address views of the project site and light pollution. No further response is required.
The commenter attended the Terra-Gen presentation and expresses concern about the limited data available on the project. The commenter states that Terra-Gen used an old Shell presentation photo of a wind turbine and expresses concern for the size of the turbines.

In accordance with Public Resources Code Section 21091 and CEQA Guidelines Section 15087, a DEIR was released for a 45-day public review period beginning April 15, 2019. The DEIR contains an evaluation of the full range of environmental topic areas, including the impact thresholds identified in Appendix G of the State CEQA Guidelines. Together, the DEIR contains over 300 pages of text related to the project’s environmental setting, applicable regulatory context, and potential impacts on the environment, which is based on substantial evidence, including facts, reasonable assumptions predicated upon facts, and expert opinion supported by facts (State CEQA Guidelines Section 15384). In addition, numerous additional studies have been conducted since publication of the DEIR, and these studies are provided as attachments to this FEIR.

The commenter expresses the opinion that the residents of Ferndale will not receive any project benefits from the proposed project and that these residents will vote based on an elected official’s support of or opposition to the proposed project.

The commenter expresses the opinion that the residents of Ferndale will not receive any project benefits from the proposed project and that these residents will vote based on an elected official’s support of or opposition to the proposed project. This comment does not raise specific questions or request information that pertains to the adequacy of the DEIR for addressing adverse physical impacts associated with the project. However, this comment is published in this Response to Comments document for public disclosure and for decision maker consideration. No further response is required.
The commenter states that the commenter attended the town hall meeting and read the DEIR. The commenter expresses the opinion that Terra-Gen chose the location of the proposed project for maximum economical return and is unconcerned with social issues. The commenter is also concerned that there is not talk about alternative energy sources.

This comment does not raise specific questions or request information that pertains to the adequacy of the DEIR for addressing adverse physical impacts associated with the project. However, this comment is published in this Response to Comments document for public disclosure and for decision maker consideration.

Please see Master Response 1, “Site Planning and Avoidance Measures,” for further information on the siting of the proposed project, the response to Comment I21-1 regarding energy generation and distribution, the responses to Comments R3-8, R3-9, R3-10, R3-18, and I12-1, which address views of the project site, the response to Comment I7-2 and Master Response 12, “Alternatives,” for a discussion of alternatives. In addition, since circulation of the DEIR, the project applicant has refined and narrowed the footprint of the proposed project to further avoid or minimize impacts, including impacts associated with tree removal. Please see “Project Description,” in Chapter 9 of this FEIR for specific refinements to the project description.

The commenter expresses the opinion that the project applicant is unconcerned about social issues. The purpose of this DEIR is to identify the significant effects of the proposed project on the physical environment and this DEIR is not intended to address social or economic impacts. “An economic or social change by itself shall not be considered a significant effect on the environment” (CEQA Guidelines Sections 15131 and 15382).
143-1 The commenter expresses concern for cultural resources and environmental resources, specifically the marbled murrelet and the reintroduction of the California condor. The commenter provides a link to a website that presents a new way to shut down turbines.

Please see the responses to Comments I15 and I59 regarding the consideration of mitigation measures.

143-2 The commenter asks if Terra-Gen could provide financial proceeds or establish an area for the Wiyot Tribe on or near the sacred ridges.

Please see the responses to Comments in Letter T2 in Chapter 6 of this FEIR for specific responses to comments submitted by the Wiyot Tribe.
144-1 The commenter expresses opposition to the proposed project and lists the reasons for the opposition: visual, damage to wildlife, new access roads, fire hazards, and drilling under the Eel River.

Information related to impacts and mitigation measures wildlife species cited by the commenter (i.e., marbled murrelet, ospreys, and eagles) are presented in Master Response 2, “Marbled Murrelet,” and Master Response 6, “Bald and Golden Eagles,” of this FEIR. Numerous additional studies have been conducted since publication of the DEIR, and these studies are provided in Appendix B of this FEIR.

Please see the responses to Comments R3-8, R3-9, R3-10, R3-18, and I12-1, which address views of the project site, and Master Response 11, “Wildfire,” for further discussion of regulatory requirements and mitigation measures that reduce the potential for wildfires.

As originally described in the DEIR, the 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, which expressed a concern about potential frac-outs during drilling, the project applicant has agreed to cross the Eel River with an overhead realignment as described in Alternative 2 in the DEIR.

In addition, since circulation of the DEIR, the project applicant has refined and narrowed the footprint of the proposed project to further avoid or minimize impacts. Please see Chapter 9 of this FEIR for specific refinements to the project description.
The commenter expresses opposition to the project and states that all measures should be discussed regarding bats, birds, mammals, and insects. The commenter also states that the area is a significant bird migration route and habitat.

Please see the responses to Comments I15 and I59 regarding the consideration of mitigation measures.
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146-1 The commenter states that most people support the proposed project and that those that do not support the proposed project are misinformed.

The commenter expresses and opinion. This comment does not raise specific questions or request information that pertains to the adequacy of the DEIR for addressing adverse physical impacts associated with the project, nor does it contain an argument raising significant environmental issues. No further response is required.
I47-1  The commenter expresses concern over the environmental impacts the proposed project would have.

The commenter requests that the County review an article prepared by the Environmental Protection Information Center (EPIC) and summarizes portions of the article. Please see the response to Comments in Letter O9 in Chapter 7, “Organizational Comments and Responses,” of this FEIR for specific responses to comments submitted by EPIC.
The commenter expresses support for the project.

This comment does not raise specific questions or request information that pertains to the adequacy of the DEIR for addressing adverse physical impacts associated with the project, nor does it contain an argument raising significant environmental issues. No further response is required.
The commenter expresses support for the project and asks that the project be attractive and unobtrusive.

The commenter expresses an opinion. This comment does not raise specific questions or request information that pertains to the adequacy of the DEIR for addressing adverse physical impacts associated with the project, nor does it contain an argument raising significant environmental issues. No further response is required.
The commenter expresses support for wind power in Humboldt County.

This comment does not raise specific questions or request information that pertains to the adequacy of the DEIR for addressing adverse physical impacts associated with the project, nor does it contain an argument raising significant environmental issues. No further response is required.
151-1 The commenter expresses support for the project and expresses the opinion that the DEIR is comprehensive.

This comment does not raise specific questions or request information that pertains to the adequacy of the DEIR for addressing adverse physical impacts associated with the project, nor does it contain an argument raising significant environmental issues. No further response is required.
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152-1 The commenter expresses support for the project and provides an example of how quiet the wind turbines can be.

The commenter expresses support for the project. This comment does not raise specific questions or request information that pertains to the adequacy of the DEIR for addressing adverse physical impacts associated with the project, nor does it contain an argument raising significant environmental issues. No further response is required.
153-1 The commenter expresses opposition to the proposed project and supports solar power.

This comment does not raise specific questions or request information that pertains to the adequacy of the DEIR for addressing adverse physical impacts associated with the project. However, this comment is published in this Response to Comments document for public disclosure. No further response is required.
154-1 The commenter states the County should realize the positive effects of clean energy.

This comment does not raise specific questions or request information that pertains to the adequacy of the DEIR for addressing adverse physical impacts associated with the project, nor does it contain an argument raising significant environmental issues. No further response is required.
The commenter states there should be “no giveaways to corporate interests.”

The commenter expresses an opinion. This comment does not raise specific questions or request information that pertains to the adequacy of the DEIR for addressing adverse physical impacts associated with the project, nor does it contain an argument raising significant environmental issues. No further response is required.
156-1 The commenter states that the CO2 produced from this project would have environmental impacts.

The commenter expresses opposition for the project. This comment does not raise specific questions or request information that pertains to the adequacy of the DEIR for addressing adverse physical impacts associated with the project. However, this comment is published in this Response to Comments document for public disclosure and for decision maker consideration.

Please see Master Response 10, “Greenhouse Gas Emissions,” which discusses the adequacy of the greenhouse gas analysis. In addition, since circulation of the DEIR, the project applicant has refined and narrowed the footprint of the proposed project to further avoid or minimize impacts. Since the publication of the DEIR, the applicant has proposed a reduction in the number of wind turbine generators from 60 to 47, spread across Monument Ridge and Bear River Ridge. Please see Chapter 9 of this FEIR for specific refinements to the project description.
The commenter states that many of the arguments against the project are false and misinformed and the jobs and renewable energy is needed in the area.

The commenter expresses support for the project. This comment does not raise specific questions or request information that pertains to the adequacy of the DEIR for addressing adverse physical impacts associated with the project, nor does it contain an argument raising significant environmental issues. No further response is required.
158-1  The commenter states that the project will cause noise pollution and disrupt the residents of Petrolia.

The commenter expresses opposition to the project. This comment does not raise specific questions or request information that pertains to the adequacy of the DEIR for addressing adverse physical impacts associated with the project. However, this comment is published in this Response to Comments document for public disclosure and for decision maker consideration. No further response is required.
The commenter states that the proposed mitigation measures seem insufficient when compared against the potential impacts on wildlife.

Determining whether a project may have a significant effect on the environment is “based on substantial evidence in light of the whole record” (CEQA Section 21082.2[a]). CEQA Guidelines Section 15370 defines mitigation” as including (1) avoiding the impact altogether by not taking a certain action or parts of an action; (2) minimizing impacts by limiting the degree or magnitude of an action and its implementation; (3) rectifying the impact by repairing, rehabilitating, or restoring the impacted environment; (4) reducing or eliminating the impact over time by preservation and maintenance operations during the life of the action; or (5) compensating for the impact by replacing or providing substitute resources or environments. The purpose of the DEIR is to fully disclose the environmental impacts of the project as proposed and then to propose mitigations to, if possible, reduce or eliminate the impacts. Where there are impacts that cannot be avoided, the DEIR identifies the impact and the reasons why the project is being proposed, notwithstanding the impact (CEQA Guidelines Section 15126.2[b]). Please also see the response to Comment I15-1.

The commenter does not specify which mitigation measures are insufficient. Additional information related to impacts and mitigation measures for wildlife species cited by the commenter (i.e., marbled murrelet, northern spotted owl, bats, migratory and special status birds, and eagles and other raptors) are presented in Master Responses 2, 3, 4, 5, and 6 of this FEIR. In addition, numerous additional studies have been conducted since the publication of the DEIR, and these studies are provided as attachments to this FEIR.
Based on a review of an article in the North Coast Journal, the commenter is “not convinced that the recently proposed wind farm should be approved.”

The commenter expresses opposition to the proposed project. This comment does not raise specific questions or request information that pertains to the adequacy of the DEIR for addressing adverse physical impacts associated with the project. However, this comment is published in this Response to Comments document for public disclosure and for decision maker consideration.

The commenter cites information provided in an article from the North Coast Journal. CEQA does not require a lead agency to conduct every test or perform all research, study, and experimentation recommended or demanded by commenters. In reviewing draft EIRs, persons and public agencies should focus on the sufficiency of the document in identifying and analyzing the possible impacts on the environment and ways in which the significant effects of the project might be avoided or mitigated (CEQA Guidelines Section 15204).

An EIR is not inadequate simply because experts in a particular environmental subject matter dispute the conclusions reached by the experts whose studies were used in drafting the EIR, even where different conclusions can reasonably be drawn from a single pool of information. (CEQA Guidelines Section 15151; Guide to the California Environmental Quality Act [CEQA] [Remy et al. 2007:499–500]; Greenebaum v. City of Los Angeles [1984] 153 Cal. App. 3d 391, 413.) Perfection is not required, but the EIR must be adequate, complete, and a good faith effort at full disclosure (CEQA Guidelines Section 15151). The DEIR for the proposed project provides an adequate, complete, and good faith effort at full disclosure of the physical environmental impacts and the conclusions are based upon substantial evidence in light of the whole record. No further response is required.
I61-1 The commenter expresses concern over the proposed wind turbine project’s effects on people, animals, and roads and feels that the industry is proceeding without proper research or concern. The commenter further opines that the proposed project may increase fire danger and requests research to prove the community’s and environment’s safety.

This comment is not directed at the adequacy of the DEIR, nor does it contain any questions regarding the CEQA analysis. The comment is published in this FEIR for decision maker consideration. No further response is required.

As described in Section 3.5, “Biological Resources,” the DEIR has committed the County to the required mitigation measures, has presented clear performance standards that have been further refined in this FEIR, and has described the means of mitigating impacts that would achieve the performance standards.

In addition, since circulation of the DEIR, the project applicant has refined the footprint of the proposed project to avoid or minimize impacts on sensitive resources. Please see “Refinements to the Project Description Since Circulation of the DEIR,” in Chapter 1 of this FEIR for the refinements that have been made to the project description. Additional technical studies completed since circulation of the DEIR are included in Appendix B of this FEIR, and updated maps based on the refined project footprint are in Appendix C of this FEIR.

The commenter notes that as a hiker they have first-hand experience of the views from Bear River Ridge, particularly views that the commenter believes would be ruined by the placement of the proposed wind turbines. The commenter expresses the opinion that poorly sited and developed wind projects can cause dramatic environmental impacts.

This comment is not directed at the adequacy of the DEIR, nor does it contain an argument raising significant environmental issues. The comment is published in this FEIR for decision maker consideration. No further response is required.

Please see Master Response 1, “Site Planning and Avoidance Measures.”
163-1 The commenter expresses opposition to the proposed project and opines that the project is over-sized and could result in detrimental effects due to logging, road building, wildlife kills, and fuel issues.

The commenter states opposition to the proposed project. This comment does not raise specific questions or request information that pertains to the adequacy of the DEIR for addressing adverse physical impacts associated with the project, nor does it contain an argument raising significant environmental issues. No further response is required.

Please see Master Response 1, "Site Planning and Avoidance Measures."
164-1  The commenter expresses concern over the placement of the proposed wind turbines in a forested area that is habitat for marbled murrelets and other birds because of the potential for take. The commenter also states that the noise associated with the wind turbines would impact auditory hunters. Further, the commenter suggests that the proposed mitigation for northern spotted owl impacts, barred owl removal, may not benefit northern spotted owls.

As described in Section 3.5, “Biological Resources,” of the DEIR, the County acknowledges that the proposed wind turbines are expected to result in bird mortality but proposes to compensate for those impacts by implementing a number of mitigation measures, including the preparation and implementation of a bird and bat conservation strategy and compensatory mitigation. Mitigation Measure 3.5-16 (Minimize Auditory Disturbance to Northern Spotted Owl) includes buffer sizes and site-specific sound attenuation intended to minimize the effects on northern spotted owls.

Please also see Master Response 3, “Northern Spotted Owl,” for information on additional analysis of potential impacts to northern spotted owls (NSOs) and for the refinements of Mitigation Measure 3.5-16 that have been made since circulation of the DEIR.

164-2  The commenter states that impacts on bats, even with mitigation, would be significant.

Impact 3.5-19 (Operational Impacts on Bats) acknowledges that project impacts on bats would be potentially significant, but with the implementation of Mitigation Measures 3.5-18a through 3.5-18d, these impacts would be reduced to less than significant.

Please also see Master Response 4 “Bats,” for information on the additional analysis of potential impacts to bats and for refinements of Mitigation Measure 3.5-18a through 3.5-18d that have been made since circulation of the DEIR.

164-3  The commenter expresses the opinion that the size of the WTG foundations and access roads would further destroy habitat and may have adverse impacts on water quality, salmon, and mammals.

Roads and WTG pads have been designed and micro-sited to minimize their effects on biological resources and water quality and the project applicant will prepare a Stormwater Pollution Prevention Plan and implement Best Management Practices to reduce potential adverse impacts to water quality and aquatic species. Since circulation of the DEIR, the project applicant has refined the footprint of the proposed project to further avoid or minimize impacts on sensitive resources. Please see Master Response 1, “Site Planning and Avoidance Measures,” and “Refinements to the Project Description Since Circulation of the DEIR,” in Chapter 1 of this FEIR for the specific refinements to the project description.

164-4  The commenter believes that it is imperative to take the concerns of the Wiyot tribe into consideration.

Please refer to the response to Comment Letter T2 for specific responses to comments submitted by the Wiyot Tribe.
The commenter states that although wind energy could play an important role in reducing dependency on fossil fuels, the proposed location has the potential to do great damage to wildlife, despite the proposed mitigation measures.

Please see Master Response 1, “Site Planning and Avoidance Measures,” for a discussion of how the project has been modified to minimize impacts on northern spotted owls and marbled murrelets. In addition, as described in Section 3.5, “Biological Resources,” the DEIR has committed the County to the required mitigation measures, has presented clear performance standards that have been further refined in this FEIR, and has described the means of mitigating impacts that would achieve the performance standards.

Please also see Master Responses 1 through 7 for additional specific information on impact analyses related to biological resources, including additional information that has become available since circulation of the DEIR.
The commenter indicates concern for wildlife and the project’s potential negative impacts on wildlife, particularly potentially reintroduced California condors, and indicates a desire for appropriate compensation if a take of condors occurs. The commenter also states his understanding that one year of eagle surveys is inadequate.

Please see the response to Comment Letter I3 regarding effects on eagles and Master Response 6, “Eagles and other Raptors,” which describes additional eagle surveys that have been conducted since circulation of the DEIR. Please also see the Eagle and Raptor Nest Survey Report Year 2 in Appendix B of this FEIR.

USFWS is proposing to establish a nonessential experimental population (NEP) of the California condor in the Pacific Northwest, including in Humboldt County. The best available data indicate that reintroduction of the California condor into the Pacific Northwest is biologically feasible and will promote the conservation of the species. This reintroduction effort is being conducted collaboratively among the Yurok Tribe, the National Park Service, and USFWS. As described in USFWS 2019, the federal Endangered Species Act's regulatory requirements with respect to reintroduced populations are significantly reduced. Take of a condor that is part of a NEP would be allowed when such take is incidental to an otherwise legal activity such as the operation of a wind energy facility. However, the applicant proposed to implement WTG curtailment to shut down turbines when condors are close to operating WTGs. This system involves independently tracking condors fitted with functional system-specific transmitters (i.e., tagged individuals) that can alert the project operators when condors are in the vicinity of the wind resource area so that specific WTGs can be shut down temporarily (curtailed). With implementation of this system, potential collisions of condors with WTGs will be avoided. Please see updated language for the mitigation related to California condors in Mitigation Measure 3.6-4 (Detect Presence of and Curtail Operations for Condor) in Chapter 9, Section 3.6, of this FEIR.
166-1 The commenter expresses support for the proposed wind energy project and notes that the project applicant has conducted detailed surveys and studies. The commenter notes that despite the fact that they expect to be greatly impacted by the proposed project next to their ranch, they are supportive of it.

This comment is not directed at the adequacy of the DEIR, nor does it contain an argument raising significant environmental issues. The comment is published in this FEIR for decision maker consideration. No further response is required.
The commenter provides what the commenter considers to be the key points of an article from the Environmental Protection Information Center (EPIC) website. The EPIC comments included a reference to CDFW’s comment letter on the Notice of Preparation (NOP), which stated that the project was proposed in a location considered inappropriate for wind development due to potential impacts on wildlife. The commenter opposes the project because it would reduce the value of her property and states that the location of the project was chosen because of its low economic value and low community involvement. The commenter further states that the town of Scotia cannot support the traffic produced by the project’s workers and expresses concern that the project applicant does not care for the community and its workers. The commenter states that there will be negative publicity for the project in relation to the heroin epidemic in Humboldt County and also states that the project would destroy the town of Scotia and would hurt the real estate market.

Regarding comments from EPIC on CDFW’s concerns about project siting and impacts on wildlife, please see the responses to Comments S4-4 through S4-17. Additional information related to impacts on avian species are presented in Master Responses 2, 3, 5, and 6 of this FEIR. In addition, since circulation of the DEIR, the project applicant has refined and narrowed the footprint of the proposed project to further avoid or minimize impacts, including impacts associated with birds. Please see Master Response 1, “Site Planning and Avoidance Measures,” which describes the refinements to the project that have been made to minimize impacts on wildlife. Please see “Refinements to the Project Description Since Circulation of the DEIR” in Chapter 1 of this FEIR for the specific refinements that have been made to the project description.

The remainder of this letter is identical to one submitted earlier by the same commenter (letter I11). Please see the response to Comment I11 in this FEIR.
The commenter expresses opposition to the proposed project.

The County acknowledges the commenter’s opposition to the proposed project. This comment does not raise specific questions or request information that pertains to the adequacy of the DEIR for addressing adverse physical impacts associated with the project, nor does it contain an argument raising significant environmental issues. No further response is required.
The commenters express opposition to the proposed project and state numerous concerns they have regarding roads, aesthetics, birds and bats, radar interference, and costs to taxpayers that they believe would result from the proposed project.

The commenters provide a number of opinions regarding expected adverse effects related to the project, but offer no substantial evidence of the alleged adverse physical impacts associated with the project, or any specifics that could be responded to. This letter is not directed at the adequacy of the DEIR, nor does it contain an argument raising significant environmental issues. The comment is published in this FEIR for decision maker consideration. No further response is required.

Please see Sections 3.2, “Aesthetics”; 3.5, “Biological Resources”; 3.11, “Noise”; and 3.12, “Transportation and Traffic” in the DEIR for an analysis of project impact on these resources. Please also see Master Response 1, “Site Planning and Avoidance Measures,” for a description of how the project has been refined and micro-sited to reduce environmental impacts. Furthermore, since circulation of the DEIR, the project applicant has refined the footprint of the proposed project to avoid or minimize impacts on sensitive resources. Please see “Refinements to the Project Description Since Circulation of the DEIR,” in Chapter 1 of this FEIR for the specific refinements that were made to the project description.
The commenter states the belief that the EIR analysis is in error and that the project has been proposed in a location inhabited by poorer residents. The commenter believes that the EIR is being fast tracked, lacks impact analysis, and is deliberately confusing. The commenter also expresses the opinion that there are tax benefits for the project applicant.

The commenter expresses an opinion. This comment does not raise specific questions or request information that pertains to the adequacy of the DEIR for addressing adverse physical impacts associated with the project, nor does it contain an argument raising significant environmental issues. No further response is required.

The commenter expresses concerns regarding turbine foundation pads, soil, water, nighttime light pollution, visual impacts, greenhouse gas emissions, the loss of redwoods, and hazardous materials the commenter believes would result from the proposed project.


Please also see Master Response 1, “Site Planning and Avoidance Measures,” for a description of how the project has been refined and micro-sited to reduce environmental impacts and Master Response 9, “Adequacy of the Greenhouse Gas Analysis,” for additional in-depth information regarding project development and impacts analyses.

Furthermore, since circulation of the DEIR, the project applicant has refined the footprint of the proposed project to avoid or minimize impacts on sensitive resources. Please see “Refinements to the Project Description Since Circulation of the DEIR,” in Chapter 1 of this FEIR for the specific refinements that were made to the project description.

The commenter expresses concern about noise and vibration cause by the turbines and the impacts on people, wildlife, soil, trees, and the environment. The commenter provides links to several studies documenting impacts.

The DEIR includes a thorough analysis of the potential noise and vibration impacts of the project. Chapter 3.11, “Noise,” of the DEIR evaluates expected project impacts associated with noise and vibration and provides for mitigation measures when necessary. Mitigation Measure 3.15-1a stipulates the use of noise-reducing construction practices to minimize temporary construction noise. Most operational noise was determined to be less than significant without any mitigation, with the exception of noise generated by the wind turbines themselves, which are addressed by mitigation Measure 3.15-3, (Implement Noise Reducing Turbine Operations). Vibration impacts would be generated only during
construction and thus would be temporary; the vibration effects were determined to be less than significant.

170-4 The commenter expresses concerns regarding financial impacts of the project, including property values, task increases, rate increases, local jobs, and local tax revenue.

170-5 The commenter requests financial information. The purpose of this DEIR is to identify the significant effects of the proposed project on the physical environment and this DEIR is not intended to address social or economic impacts. “An economic or social change by itself shall not be considered a significant effect on the environment” (CEQA Guidelines Sections 15131 and 15382). No further response is required.
The commenter indicates that although the proposed project site may be ideal for the project, wildlife is important also. The commenter also questions the fast-tracked schedule and suggests that the County slow the process and address the concerns that have been expressed.

This comment regarding schedule is not directed at the adequacy of the DEIR, nor does it contain an argument raising significant environmental issues. The comment is published in this FEIR for decision maker consideration. No further response is required.

Regarding impacts on wildlife, as described in Section 3.5, “Biological Resources,” the DEIR has committed the County to the required mitigation measures, presented clear performance standards that have been refined in the FEIR, and described the means of mitigating impacts that would achieve the performance standards. Please also see Master Responses 2 through 8 for additional details related to the analysis of impacts on biological resources.

In addition, since circulation of the DEIR, the project applicant has refined the footprint of the proposed project to avoid or minimize impacts on sensitive resources. Please see “Refinements to the Project Description Since Circulation of the DEIR,” in Chapter 1 of this FEIR for the specific refinements that were made to the project description.
The commenter expresses opinions regarding the project’s effects on tribal lands, native grasslands, animals, and birds.

This comment does not raise specific questions or request information that pertains to the adequacy of the DEIR for addressing adverse physical impacts associated with the project, nor does it contain an argument raising significant environmental issues.

Please see the responses to Comments T1 and T2, which address project effects on tribal lands and cultural resources. For information on the effects of the project on grasslands, birds, and other animals, please see the responses to Comments S4-4 through S4-17, and Master Response 7, “Special-Status Plants and Sensitive Communities,” and Section 3.5.3, “Environmental Impacts and Mitigation Measures” in Section 3.5, “Biological Resources,” in the DEIR.
The commenter expresses concern regarding the proposed location of the wind turbines, primarily with respect to fire danger, stating the opinion that the turbines themselves could be the cause of fire. The commenter believes that the risk of fire is substantial and potentially devastating.

Please see Master Response 11, “Wildfire,” for a discussion of the wildfire risk associated with the project.

The commenter notes that the agency decision makers must issue a statement of overriding considerations if impacts cannot be mitigated to less than significant and recommends that the County supervisors who vote to approve the project be held responsible for any fires associated with the proposed project.

The project approval package will include a statement of overriding consideration. The opinion of the commenter is noted. No further response is necessary.
The commenter is opposed to the proposed project for several stated reasons, including environmental harm, wildlife death, and the impacts of the WTG footings. In addition, the commenter expresses the opinion that the proposed project would further damage land taken from the Wiyot tribe.

This comment is not directed at the adequacy of the DEIR, nor does it contain an argument raising significant environmental issues. The comment is published in this FEIR for decision maker consideration.

As described in Section 3.5, “Biological Resources,” the DEIR has committed the County to the required mitigation measures, presented clear performance standards that have been refined in the FEIR, and described the means of mitigating impacts that would achieve the performance standards.

In addition, since circulation of the DEIR, the project applicant has refined the footprint of the proposed project to avoid or minimize impacts on sensitive resources. Please see Master Response 1, “Site Planning and Avoidance Measures,” and “Refinements to the Project Description Since Circulation of the DEIR” in Chapter 1 of this FEIR for the specific refinements that have been made to the project description.

Section 3.5, “Biological Resources,” of the DEIR includes descriptions of expected effects on wildlife and proposed mitigation measures. Please also see the response to comment letter T2, which addresses comments from the Wiyot Tribe.
The commenter refers to the proposed project as “an excellent example” of what is needed now, particularly with respect to reducing the use of fossil fuels.

This comment is not directed at the adequacy of the DEIR, nor does it contain an argument raising significant environmental issues. The comment is published in this FEIR for decision maker consideration. No further response is required.
The commenter is opposed to the proposed project, citing aesthetics, noise, costs, and wildlife impacts that the commenter believes would result from the proposed project.

The County acknowledges the commenter’s opposition to the proposed project. This comment does not raise specific questions or request information that pertains to the adequacy of the DEIR for addressing adverse physical impacts associated with the project, nor does it contain an argument raising significant environmental issues.

Please see Sections 3.2, “Aesthetics”; 3.5, “Biological Resources”; 3.11, “Noise”; and 3.12, “Transportation and Traffic” in the DEIR. Please also see Master Response 1, “Site Planning and Avoidance Measures.”

In addition, since circulation of the DEIR, the project applicant has refined the footprint of the proposed project to avoid or minimize impacts on sensitive resources. Please see “Refinements to the Project Description Since Circulation of the DEIR,” in Chapter 1 of this FEIR for the specific refinements that were made to the project description.
The commenter opposes the proposed project and expresses concern that it is expected to alter views and adversely affect birds, plants, and Native Americans.

The County acknowledges the commenter’s opposition to the proposed project. This comment does not raise specific questions or request information that pertains to the adequacy of the DEIR for addressing adverse physical impacts associated with the project, nor does it contain an argument raising significant environmental issues.

Please see the response to Comment Letter I12 regarding aesthetics, Section 3.5, Biological Resources,” of the DEIR for a discussion of project impacts on wildlife and plants, and the responses to Comment Letters T1 and T2, which address Native American concerns.

In addition, since circulation of the DEIR, the project applicant has refined the footprint of the proposed project to avoid or minimize impacts on sensitive resources. Please see Master Response 1, “Site Planning and Avoidance Measures,” and “Refinements to the Project Description Since Circulation of the DEIR” in Chapter 1 of this FEIR for the specific refinements that were made to the project description.
178-1  The commenter relates a personal experience with a wind energy company in Iowa; the commenter indicates that ratepayers experienced a 20% increase in electricity costs as a result of construction costs. The commenter describes wind turbines in disrepair and damage to roads and drainage tiles resulting from the movement of wind turbines and equipment.

This comment is not directed at the adequacy of the DEIR, nor does it contain an argument raising significant environmental issues. The comment is published in this FEIR for decision maker consideration. No further response is required.

178-2  The commenter questions the conversion of TPZ and Williamson Act lands described in the DEIR.

Construction and operation of electrical distribution and transmission lines are permitted uses in a TPZ. Construction and operation of wind generation facilities are conditionally permitted in a TPZ. Thus, the project would not conflict with existing zoning for, or cause rezoning of, forestry resources.

The Williamson Act provides a process for canceling a contract. The property landowner must petition to cancel a contract and the petition would be reviewed by the County after making specific findings that are supported by substantial evidence. A cancellation fee equal to 12.5 percent of the unrestricted, current fair market valuation of the property must also be paid.

Forestry and agricultural resources are addressed in Section 3.3 if the DEIR.

178-3  The commenter expresses concern over noise and vibration and wonders about mitigation for these impacts.

Chapter 3.11, “Noise,” of the DEIR evaluates expected project impacts associated with noise and vibration and provides mitigation measures when necessary. Mitigation Measure 3.15-1a stipulates the use of noise-reducing construction practices to minimize temporary construction noise. Most operational noise was determined to be less than significant without any mitigation, with the exception of noise generated by the wind turbines themselves, which are addressed by mitigation Measure 3.15-3 (Implement Noise Reducing Turbine Operations). Vibration impacts would only be generated during construction and thus would be temporary; the vibration effects were determined to be less than significant.
179-1 The commenter provides much information, including references, on night light pollution and concludes with the statement that a lack of data on the effects of artificial night light warrant disapproval of the project.

This comment is not directed at the adequacy of the DEIR, nor does it contain any questions regarding the CEQA analysis. The comment is published in this FEIR for decision maker consideration.

Please see the responses to comments in letter R3 (R3-8, R3-9, R3-10, and R3-18), which address light pollution.

In addition, since circulation of the DEIR, the project applicant has refined the footprint of the proposed project to avoid or minimize impacts on sensitive resources. Please see Master Response 1, “Site Planning and Avoidance Measures,” and “Refinements to the Project Description Since Circulation of the DEIR,” in Chapter 1 of this FEIR for the specific refinements that were made to the project description.
The comment includes a number of questions (e.g., acreage of trees to be removed, expected actual energy production, time for the project to become carbon neutral). The commenter also expresses concern regarding the ultimate users of the energy produced; specifically, whether they would be local or outside of Humboldt County.

Please see Master Response 10, “Adequacy of the Greenhouse Gas Analysis,” for a discussion that includes effects on trees and expected energy production. The response to comment letter I21 addresses electricity distribution. Impacts on forested habitat are addressed in Section 3.5, “Biological Resources,” of the DEIR. Master Response 7, “Special-status Plants and Sensitive Communities,” addresses impacts on forest resources.
I81-1  The commenter provides a number of reasons why the commenter is opposed to the proposed project. The commenter expresses the opinion that the project area is important to Native Americans, the project would create few local jobs, it is unlikely that the energy produced would remain in the County, the project ridges are currently unspoiled and in the flight paths of many birds, and that it is debatable how “green” wind energy is.

This comment is not directed at the adequacy of the DEIR, nor does it contain any questions regarding the CEQA analysis. The comment is published in this FEIR for decision maker consideration.

Native American concerns are addressed in the responses to comments T1 and T2. The response to comment I21 addresses electricity distribution. Birds are discussed in Section 3.5, “Biological Resources,” of the DEIR, as well as Master Responses 2, “Marbled Murrelet”; 3, “Northern Spotted Owl”; 5, “Migratory and Special-Status Birds”; and 6, “Eagles and other Raptors.”
182-1 *The commenter does not support the proposed project.*

This comment is not directed at the adequacy of the DEIR, nor does it contain any questions regarding the CEQA analysis. The comment is published in this FEIR for decision maker consideration. No further response is required.
This comment includes two additional letters previously submitted on the proposed project (October 29, 2018 and May 20, 2019; the latter is I22 to which the former is attached). The commenters state that the DEIR fails to consider ground vibration and the potential effects on the aquifer that supplies their water and their access road. The commenters note that they support the No Project Alternative.

The nearest receptors to construction sites that would involve heavy-duty construction equipment would be 200 feet from transmission line construction and 240 feet from temporary off-ramp construction at Hookton Road. The nearest receptor to construction sites with blasting activity (turbine foundation construction areas) would be at a distance of more than 800 feet. At these distances, vibrations generated by heavy-duty construction equipment would not exceed the recommended FTA (80 VdB) or Caltrans (0.2 in/sec PPV) standards at these receptors. Therefore, the temporary and short-term impacts related to vibration from project construction equipment would be less than significant.
The commenter notes that wind energy is “crucial,” but expresses concern that the project, if located where proposed, would be detrimental to the Wiyot Tribe’s ancestral resources.

This comment is not directed at the adequacy of the DEIR, nor does it contain any questions regarding the CEQA analysis. The comment is published in this FEIR for decision maker consideration.

Please see Master Response 1, “Site Planning and Avoidance Measures,” for a description of the criteria used in refining the project footprint. Please also refer to the response to Comment Letter T2 for specific responses to comments submitted by the Wiyot Tribe.
The commenter expresses concern about the size of the turbines and associated infrastructure and the potential for hazards and disturbance to birds and wildlife. The commenter states that the project applicant can “do better” if the County/community press for a better solution.

The County acknowledges the commenter’s opposition to the proposed project. This comment does not raise specific questions or request information that pertains to the adequacy of the DEIR for addressing adverse physical impacts associated with the project, nor does it contain an argument raising significant environmental issues. No further response is required.

Please note that the project applicant has refined the proposed project since circulation of the DEIR, partially in response to comments received on that document. The project footprint has been refined to avoid or minimize impacts on sensitive resources. Please see Master Response 1, “Site Planning and Avoidance Measures,” and “Refinements to the Project Description Since Circulation of the DEIR” in Chapter 1 of this FEIR.
The commenters express support for the proposed project and indicate their belief that the DEIR has taken into account everything that they believe can be evaluated.

The commenters indicate their support for the DEIR analyses. The comment is published in this FEIR for decision maker consideration. No further response is required.

The commenters recommend that extra effort be taken to prevent fire danger.

This comment is not directed at the adequacy of the DEIR, nor does it contain any questions regarding the CEQA analysis. The comment is published in this FEIR for decision maker consideration.

Please refer to Master Response 10, “Wildfire,” which includes a discussion of the proposed efforts to minimize fire risk.

The commenters express support for the proposed project and state their belief that the proposed project is well-thought-out and the DEIR comprehensive.

The commenters note that in their opinion, the DEIR is thorough. The comment is published in this FEIR for decision maker consideration. No further response is required.
The commenters state that the proposed project is poorly sited. They state that they have serious concerns about the environmental impacts of the proposed project and express the opinion that there are many other windy locations that would be more appropriate for a wind energy project.

The commenters provide an opinion that other more suitable sites exist for the proposed project but neither provide specific locations nor explain why other sites might be superior. Please refer to Master Response 1, “Site Planning and Avoidance Measures,” for a detailed description of the criteria used in screening sites for potential wind energy development.

The commenters express the opinion that the footprint of construction disturbance would be much greater than the finished roadbed. They also state that the EIR does not adequately address impacts of road, power line, and other infrastructure construction and maintenance and that critical details regarding road location and geomorphology are not addressed in the document. The letter includes examples of potential impacts that the commenters believe could occur. The commenters express the opinion that the footprint of construction disturbance on steep unstable slopes will be far greater than the finished roadbed. They question who would be responsible for the challenging and costly maintenance “into perpetuity” of roads constructed for the project, while stating that abandonment is “unacceptable.” The commenters indicate that the DEIR does not disclose the location or length of the existing roads that are proposed for widening or upgrading, so the impacts cannot be analyzed.

While long and inclusive of many issues, this comment is primarily focused on roads associated with the proposed project.

Proposed road and infrastructure have been thoroughly analyzed in the DEIR, and care has been taken to distinguish between temporary impacts that would occur during construction when roads are constructed or widened to allow transport of construction equipment and WTG components, and permanent impacts that comprise the project footprint after construction and reclamation of temporarily disturbed areas. The proposed roads and infrastructure are shown on many project graphics.

DEIR Section 2.4.1, “Operations and Maintenance Plan,” also notes that after construction of the project, permanent access roads would be returned to HRC for their use as timberland access roads and HRC would be responsible for maintenance. Upon decommissioning, project access roads would be removed, and the area restored to its pre-project condition.

In addition, since circulation of the DEIR, the project applicant has refined the footprint of the proposed project to avoid or minimize impacts on sensitive resources. Please see Master Response 1, “Site Planning and Avoidance Measures,” and “Refinements to the Project Description Since Circulation of the DEIR,” in Chapter 1 of this FEIR for the specific refinements that were made to the project description.

Updated project maps are included in Appendix C of this FEIR and updated impact acres are presented (by habitat type) in Chapter 9, “Biological Resources of this FEIR.”
187-3  The commenters repeat their belief that there are “many other windy locations” that would cause fewer impacts.

The commenters provide an opinion that other more suitable sites exist for the proposed project but provide no specific locations or explain why other sites might be superior. Please refer to Master Response 1, “Site Planning and Avoidance Measures.”

187-4  The commenters suggest that the proposed project should be moved, based on evidence presented in the EIR of Native American use of the project area.

Please see Section 3.6.3, “Cultural Resources Environmental Impacts and Mitigation Measures,” of the DEIR, which includes mitigation measures intended to avoid, minimize, or compensate for impacts on cultural resources, include those of Native Americans. Also, please refer to Master Response 1, “Site Planning and Avoidance Measures,” and the responses to comments T1 and T2, which address concerns raised by Native Americans.

187-5  The commenters express concern over the potential for listed species and other birds to be killed by the turbine blades. The commenters also express the opinion that the visual aesthetics of the project area would be lost as a result of the proposed project.

This comment is not directed at the adequacy of the DEIR, nor does it contain any questions regarding the CEQA analysis. The comment is published in this FEIR for decision maker consideration.


Please also see the response to Comment Letter I12, which addresses aesthetics and views of the project site.
The commenter expresses support for the proposed project, as it represents what is needed to stop the worst consequences of climate change.

The commenter’s support for the project is noted. This comment is not directed at the adequacy of the DEIR, nor does it contain any questions regarding the CEQA analysis. The comment is published in this FEIR for decision maker consideration. No further response is required.
189-1  The commenter expresses opposition to the proposed project, referring to its location, and expresses the opinion that the environmental damage would be “too much,” including visual impacts and habitat destruction from road building and widening. The commenter also believes that the transmission line would result in habitat destruction, herbicide use, and increased fire risk. The commenter also believes that noise and vibration from the turbines would have negative effects on humans and wildlife. The commenter also states that large numbers of heavy vehicles and equipment would degrade the roadways. The commenter further states that noise and vibration from the turbines would negatively affect wildlife and humans.

The commenter expresses a number of opinions regarding the potential effects of the proposed project, but provides no data, scientific studies or other information. This comment is not directed at the adequacy of the DEIR, nor does it contain any questions regarding the CEQA analysis. The comment is published in this FEIR for decision maker consideration.

Please see the response to Comment Letter I12 regarding existing and expected future aesthetic resources; the response to Comment Letter I70-3 regarding vibration and response, and the response to Comment Letter I87-2 regarding impacts from roads. Also see Master Response 1, “Site Planning and Avoidance Measures,” which discusses project siting as well as the avoidance measures proposed by the project applicant to reduce impacts, and Master Response 10, “Wildfire,” which includes a discussion of proposed efforts to minimize fire risk.
The commenter expresses the opinion that the renewable energy industry is aggressively promoting projects such as that proposed. The letter also includes the commenter’s 2018 comments previously sent to the California Energy Commission.

The commenter provides opinions on the potential effects of the proposed project and links to several technical websites, but no data or other information to support these opinions. This comment is not directed at the adequacy of the DEIR, nor does it contain any questions regarding the CEQA analysis. The comment is published in this FEIR for decision maker consideration. No further response is required.
191-1 The commenter provides a copy of Form letter A.

A1: The commenter expresses the opinion that poorly sited and developed wind projects can cause dramatic environmental impacts.

The commenter provides the opinion that poorly sited and developed wind energy projects cause dramatic environmental impacts, but neither identifies why the commenter considers this specific project poorly sited nor suggests alternative layouts that would reduce impacts. Please see Master Response 1, “Site Planning and Avoidance Measures.”

This comment is not directed at the adequacy of the DEIR, nor does it contain an argument raising significant environmental issues. The comment is published in this FEIR is for decision maker consideration. No further response is required.

A2: The commenter states that the DEIR indicates that the proposed project is likely to result in the death of numerous special-status species, such as the marbled murrelet, and may cause population-level impacts to once-numerous species, such as the hoary bat. The commenter states that the DEIR must be revised to incorporate additional mitigation measures to reduce these impacts to a level below a level of significance, including proper siting of the wind turbines to avoid impacts, operational curtailments during high-risk periods, and the incorporation of deterrence technologies. In addition, the commenter states that the County needs to insist on a robust and meaningful adaptive management program to continue to monitor and minimize impacts throughout the life of the project.

As described in Section 3.5, “Biological Resources,” the DEIR has committed the County to the required mitigation measures, presented clear performance standards that have been refined in the FEIR, and described the means of mitigating impacts that would achieve the performance standards.

The DEIR includes adaptive management approaches as an important element of management and minimization of project impacts on birds and bats. Please see Mitigation Measure 3.5-2b (Conduct Postconstruction Mortality Monitoring for Marbled Murrelets and Other Species); Mitigation Measure 3.5-5b (Conduct Postconstruction Mortality Monitoring for Eagles); Mitigation Measure 3.5-7 (Avoid, Minimize, and Compensate for Construction Impacts on Northern Spotted Owl); Mitigation Measure 3.5-14 (Avoid and Minimize Operational Impacts on Nonraptor Birds); Mitigation Measure 3.5-18b (Conduct Bat Surveys and Mortality Monitoring); and Mitigation Measure 3.5-18d (Implement Operational Minimization Measures and Mitigation). Several of these measures have been further refined in this FEIR based on additional data provided by new and updated technical studies. Please see Section 3.5, “Biological Resources,” in Chapter 9, and “Revisions to the DEIR,” of this FEIR for the specific refinements to mitigation measures.

In addition, since circulation of the DEIR, the project applicant has refined the footprint of the proposed project to avoid or minimize impacts on sensitive resources. Please see “Refinements to the Project Description Since Circulation of the DEIR,” in Chapter 1 of this FEIR for the specific refinements that
were made to the project description. Updated project maps are included in Appendix C of this FEIR, and additional technical studies that were completed since the circulation of the DEIR are included in Appendix B.

Please also see Master Response 1, “Site Planning and Avoidance Measures,” for a summary of project siting, planning, and design criteria, including the siting criteria considered to avoid and minimize impacts on marbled murrelets.

Master Response 2, “Marbled Murrelet,” provides updated marbled murrelet survey results and additional information on the proposed mitigation measures for marbled murrelets.

Master Response 3, “Bats,” provides additional information on the analysis of operational impacts on bats, and on the proposed avoidance, minimization, and mitigation measures for project impacts on bats.
The commenter indicates support for “clean” energy production but is opposed to the proposed project because of the visible location, impacts on wildlife, and large amount of material to be transported on County roads.

This comment is not directed at the adequacy of the DEIR, nor does it contain any questions regarding the CEQA analysis. The comment is published in this FEIR for decision maker consideration.

The commenter expresses a number of concerns but offers no specifics. Please see the response to Comment Letter I12 for a discussion of aesthetics. Several Master Responses address wildlife, including Master Response 2, “Marbled Murrelet”; Master Response 3, “Northern Spotted Owl”; Master Response 4, “Bats”; Master Response 5, “Migratory and Special-Status Birds”; and Master Response 6, “Eagles and other Raptors.” Only minimal improvements to public roads would be used to transport turbine components from Fields Landing to the project staging area (Chapter 2.3.2 of the DEIR, “Component Transport to the Project Site”).
The commenter provides a copy of Form letter A.

A1: The commenter expresses the opinion that poorly sited and developed wind projects can cause dramatic environmental impacts.

The commenter provides an opinion that poorly sited and developed wind energy projects cause dramatic environmental impacts, but neither identifies why he or she considers this specific project poorly sited nor suggests alternative layouts that would reduce impacts. Please see Master Response 1, “Site Planning and Avoidance Measures,” which addresses project siting, planning, and design criteria.

This comment is not directed at the adequacy of the DEIR, nor does it contain an argument raising significant environmental issues. The comment is published in this FEIR is for decision maker consideration. No further response is required.

A2: The commenter states that the DEIR indicates that the proposed project is likely to result in the deaths of numerous special-status species, such as the marbled murrelet, and may cause population-level impacts to once-numerous species, such as the hoary bat. The commenter states that the DEIR must be revised to incorporate additional mitigation measures that would reduce impacts to a level that is below a level of significance, including proper siting of the wind turbines to avoid impacts, operational curtailments during high-risk periods, and incorporation of deterrence technologies. In addition, the commenter states that the County needs to insist on a robust and meaningful adaptive management program to continue to monitor and minimize impacts throughout the life of the project.

As described in Section 3.5, “Biological Resources,” the DEIR has committed the County to the required mitigation measures, presented clear performance standards that have been refined in the FEIR, and described the means of mitigating impacts that would achieve the performance standards.

The DEIR includes adaptive management approaches as an important element of the management and minimization of project impacts on birds and bats. Please see Mitigation Measure 3.5-2b (Conduct Postconstruction Mortality Monitoring for Marbled Murrelets and Other Species); Mitigation Measure 3.5-5b (Conduct Postconstruction Mortality Monitoring for Eagles); Mitigation Measure 3.5-7 (Avoid, Minimize, and Compensate for Construction Impacts on Northern Spotted Owl); Mitigation Measure 3.5-14 (Avoid and Minimize Operational Impacts on Nonraptor Birds); Mitigation Measure 3.5-18b (Conduct Bat Surveys and Mortality Monitoring); and Mitigation Measure 3.5-18d (Implement Operational Minimization Measures and Mitigation). Several of these measures have been further refined in this FEIR, based on additional data provided by new and updated technical studies. Please see Section 3.5, “Biological Resources,” in Chapter 9, “Revisions to the DEIR,” of this FEIR for specific refinements to mitigation measures.

In addition, since circulation of the DEIR, the project applicant has refined the footprint of the proposed project to avoid or minimize impacts on sensitive resources. Please see “Refinements to the Project Description Since Circulation of the DEIR,” in Chapter 1 of this FEIR for the specific refinements that
were made to the project description. Updated project maps are included in Appendix C of this FEIR, and additional technical studies completed since circulation of the DEIR are included in Appendix B.

Please also see Master Response 1, “Site Planning and Avoidance Measures,” for a summary of project siting, planning, and design criteria, including the siting criteria considered to avoid and minimize impacts on marbled murrelets.

Master Response 2, “Marbled Murrelet,” provides updated marbled murrelet survey results and additional information on the proposed mitigation measures for marbled murrelets.

Master Response 3, “Bats,” provides additional information on the analysis of operational impacts on bats, and on proposed avoidance, minimization, and mitigation measures for project impacts on bats.
The commenter provides a copy of Form letter A.

A1: The commenter expresses the opinion that poorly sited and developed wind projects can cause dramatic environmental impacts.

The commenter provides an opinion that poorly sited and developed wind energy projects cause dramatic environmental impacts, but neither identifies why he or she considers this specific project poorly sited nor suggests alternative layouts that would reduce impacts. Please see Master Response 1, “Site Planning and Avoidance Measures,” which addresses project siting, planning, and design criteria.

This comment is not directed at the adequacy of the DEIR, nor does it contain an argument raising significant environmental issues. The comment is published in this FEIR is for decision maker consideration. No further response is required.

A1: The commenter states that the DEIR indicates that the proposed project is likely to result in the death of numerous special-status species, such as the marbled murrelet, and may cause population-level impacts to once-numerous species, such as the hoary bat. The commenter states that the DEIR must be revised to incorporate additional mitigation measures to reduce impacts to a level that is below a level of significance, including proper siting of wind turbines to avoid impacts, operational curtailments during high-risk periods, and the incorporation of deterrence technologies. In addition, the commenter states that the County needs to insist on a robust and meaningful adaptive management program to continue to monitor and minimize impacts throughout the life of the project.

As described in Section 3.5, “Biological Resources,” the DEIR has committed the County to the required mitigation measures, presented clear performance standards that have been refined in the FEIR, and described the means of mitigating impacts that would achieve the performance standards.

The DEIR includes adaptive management approaches as an important element of the management and minimization of project impacts on birds and bats. Please see Mitigation Measure 3.5-2b (Conduct Postconstruction Mortality Monitoring for Marbled Murrelets and Other Species); Mitigation Measure 3.5-5b (Conduct Postconstruction Mortality Monitoring for Eagles); Mitigation Measure 3.5-7 (Avoid, Minimize, and Compensate for Construction Impacts on Northern Spotted Owl); Mitigation Measure 3.5-14 (Avoid and Minimize Operational Impacts on Nonraptor Birds); Mitigation Measure 3.5-18b (Conduct Bat Surveys and Mortality Monitoring); and Mitigation Measure 3.5-18d (Implement Operational Minimization Measures and Mitigation). Several of these measures have been further refined in this FEIR, based on additional data provided by new and updated technical studies. Please see Section 3.5, “Biological Resources,” in Chapter 9, “Revisions to the DEIR,” of this FEIR for the specific refinements to mitigation measures.

In addition, since circulation of the DEIR, the project applicant has refined the footprint of the proposed project to avoid or minimize impacts on sensitive resources. Please see “Refinements to the Project Description Since Circulation of the DEIR,” in Chapter 1 of this FEIR for the specific refinements that
were made to the project description. Updated project maps are included in Appendix C of this FEIR, and additional technical studies completed since circulation of the DEIR are included in Appendix B.

Please also see Master Response 1, “Site Planning and Avoidance Measures,” for a summary of project siting, planning, and design criteria, including the siting criteria considered to avoid and minimize impacts on marbled murrelets.

Master Response 2, “Marbled Murrelet,” provides updated marbled murrelet survey results and additional information on the proposed mitigation measures for marbled murrelets.

Master Response 3, “Bats,” provides additional information on the analysis of operational impacts on bats, and on proposed avoidance, minimization, and mitigation measures for project impacts on bats.
195-1 The commenter expresses opposition to the proposed project, primarily on the grounds of potential impacts on birds, making statements that albatross, murrelet, puffins, and other species are on the verge of extinction.

The commenter makes many broad statements regarding the status of species but fails to provide any data, scientific studies, or other information to support these claims. The County acknowledges the commenter’s opposition to the proposed project. This comment does not raise specific questions or request information that pertains to the adequacy of the DEIR for addressing adverse physical impacts associated with the project, nor does it contain an argument raising significant environmental issues. No further response is required.

Please see Master Responses 2, “Marbled Murrelet”; 3, “Northern Spotted Owl”; 5, “Migratory and Special Status Birds”; and 6, “Eagles and other Raptors,” for specific information on the impact analysis and proposed mitigation for birds.
The commenter is supportive of the proposed project and expresses the opinion that the proposed project would be an important step forward toward reducing atmospheric CO2.

For additional information on the proposed project’s relationship with respect to CO2, please see Master Response 9, “Adequacy of Greenhouse Gas Analysis.” This comment is not directed at the adequacy of the DEIR, nor does it contain any questions regarding the CEQA analysis. The comment is published in this FEIR for decision maker consideration. No further response is required.
197-1 The commenter states the belief that impacts are not adequately mitigated but that moving the proposed turbine locations could reduce the overall size and footprint of the project to avoid high-impact areas.

This comment is not directed at the adequacy of the DEIR, nor does it contain any questions regarding the CEQA analysis. The comment is published in this FEIR for decision maker consideration.

Please see Master Response 1, “Site Planning and Avoidance Measures.” In addition, since circulation of the DEIR, the project applicant has refined the footprint of the proposed project to avoid or minimize impacts on sensitive resources. Please see “Refinements to the Project Description Since Circulation of the DEIR,” in Chapter 1 of this FEIR for the specific refinements that were made to the project description. Updated project maps are included in Appendix C of this FEIR, and additional technical studies completed since circulation of the DEIR are included in Appendix B.

197-2 The commenter expresses concern for the adverse impacts on marbled murrelets and states that the proposed mitigation and quantification of murrelet deaths caused by the wind turbines are unrealistic. The commenter further opines that other proposed mitigation measures are unlikely to be successful in compensating for murrelet mortality.

Please see Master Response 2, “Marbled Murrelets.”

197-3 The commenter expresses concern that the DEIR “punts” the development of specific mitigation for avian mortality to the future.

CEQA does not require an applicant to go through the time and expense of preparing engineering plans, facility designs, and detailed management or operational plans that implement mitigation measures prior to approval of the project. It is adequate to recognize a significant effect, adopt a measure that commits the lead agency to mitigate, and describe the specific performance criteria for the mitigation, if the plans, design details, or precise means to mitigate cannot be practically defined at the time of project approval, provided that the agency (1) commits itself to the mitigation, (2) adopts specific performance standards that the mitigation will achieve, and (3) identifies the type(s) of potential action(s) that can feasibly achieve that performance standard and that will be considered, analyzed, and potentially incorporated in the mitigation measure. In addition, the County is preparing a Mitigation, Monitoring, and Reporting Plan.

Since publication of the DEIR, the applicant has provided additional information about the proposed mitigation measures for avian species. Please see Master Response 2, “Marbled Murrelet”; Master Response 3, “Northern Spotted Owl”; Master Response 5, “Migratory and Special-Status Birds”; and Master Response 6, “Eagles and Other Raptors.”

197-4 The commenter indicates their belief that the proposed mitigation for adverse effects on raptors is insufficient.

Please see Master Response 6, “Eagles and other Raptors.”
The commenter considers impacts to horned larks and hoary bats as potentially leading to large reductions in populations, particularly based on the location of the proposed project, and does not believe that these impacts are adequately addressed in the DEIR.

Please see Master Responses 4, “Bats,” and 5, “Migratory and Special-Status Birds.”

The commenter believes that the siting of the proposed project is of concern to the hoary bat and that the proposed mitigation measures cannot be relied on to reduce adverse impacts to less than significant.

Impact 3.5-19 (Operational Impacts on Bats) recognizes that the impacts would be significant, but that with the implementation of proposed mitigation measures these impacts would be reduced to less than significant. Also, please see Master Response 4, “Bats.”
The commenter opposes the proposed project but provides no specific reason.

The County acknowledges the commenter’s opposition to the proposed project. This comment does not raise specific questions or request information that pertains to the adequacy of the DEIR for addressing adverse physical impacts associated with the project, nor does it contain an argument raising significant environmental issues. No further response is required.
The commenter recommends the denial of the proposed project and expresses concern regarding environmental impacts, sound from the turbines, and what the commenter perceives as a “fast tracked” process.

The County acknowledges the commenter’s opposition to the proposed project. This comment does not raise specific questions or request information that pertains to the adequacy of the DEIR for addressing adverse physical impacts associated with the project, nor does it contain an argument raising significant environmental issues. No further response is required.

Please see Section 3.11, “Noise,” in the DEIR for an analysis of the noise generated by the turbines.
I100-1  *The commenter expresses concerns regarding the proposed project, including “visual blight.”*

This comment is not directed at the adequacy of the DEIR, nor does it contain any questions regarding the CEQA analysis. The comment is published in this FEIR for decision maker consideration. No further response is required.

Please see the response to Comment Letter I12, which addresses aesthetics.

I100-2  *The commenter expresses concern regarding threats to birds, particularly the California condor.*

This comment is not directed at the adequacy of the DEIR, nor does it contain any questions regarding the CEQA analysis. The comment is published in this FEIR for decision maker consideration.

Effects on birds are addressed in a number of locations in this FEIR: Chapter 3.5, “Biological Resources,” and Master Responses 2, “Marbled Murrelet”; 3, “Northern Spotted Owl”; 5, “Migratory and Special Status Birds”; and 6, “Eagles and Other Raptors.” Regarding concerns about condors, please see the response to Comment I65-1.

I100-3  *The commenter expresses concern over the perceived effects that earth moving and road building equipment would have on coastal grasslands, particularly through the potential introduction of invasive plant seeds.*

The impact of construction on sensitive plant communities, including coastal grasslands, is discussed in Section 3.5-24, “Loss or Disturbance of Sensitive Natural Communities and Riparian Habitat,” of the DEIR. The Revegetation, Reclamation, and Weed Control Plan, included in Appendix B in this FEIR, addresses potential impacts associated with the introduction of invasive weeds and provides appropriate avoidance and minimization measures for this impact. Please also see Master Response 7, “Special Status Plants and Sensitive Communities.”

I100-4  *The commenter states that they are aware of “no mitigation proposed in the DEIR that would compensate the Wiyots for the degradation of this site.”*

Please refer to the response to Comment Letter T2 for specific responses to comments submitted by the Wiyot Tribe.

I100-5  *The commenter indicates that “the DEIR does not tell us what the net carbon emissions would be.”*

Please see Master Response 10, “Adequacy of the Greenhouse Gas Analysis.”
The commenter supports the proposed project and “applauds” the County for “taking the first steps in addressing our future power needs” along with concerns for “environmental security.” The commenter questions the loss of avian population from wind turbines versus petroleum spills. The commenter also feels that the County is facing climate change and that seal level rise will be significant, and suggests that not ignoring a solution (presumably the proposed project) would have a direct impact on the community. The commenter further questions whether cameras might be mounted on some turbines to monitor birds.

This comment is not directed at the adequacy of the DEIR, nor does it contain any questions regarding the CEQA analysis. The comment is published in this FEIR for decision maker consideration. No further response is required.
1102-1  The commenter expresses support of the proposed project.

The support for the project is noted. This comment is not directed at the adequacy of the DEIR, nor does it contain any questions regarding the CEQA analysis. The comment is published in this FEIR for decision maker consideration. No further response is required.
I103-1 The commenter opposes the proposed project and states that the project is opposed by the Wiyot Tribe. The commenter also expresses the opinion that the project does not serve the long-term goals of sustainability and conservation, and that wind turbines have significant environmental effects. The commenter concludes by recommending that education and action aimed at reducing energy usage is key.

The commenter expresses opinions regarding the environmental effects of wind turbines and makes the statement that they do not “serve long-term goals.” No specific descriptions of environmental effects are included in the letter and there is no explanation of how the proposed project fails to serve the stated goals. This comment is not directed at the adequacy of the DEIR, nor does it contain any questions regarding the CEQA analysis. The comment is published in this FEIR for decision maker consideration. No further response is required.

Regarding the Wiyot Tribe, please refer to the response to Comment Letter T2 for specific responses to comments submitted by the Wiyot Tribe.
1104-1  The commenter requests additional comment time, a meeting with Terra-Gen, and a hard copy of “all information regarding the impacts to Fields Landing.” The commenter further requests that the findings be made public, “not in an online 800-page document.”

This comment is not directed at the adequacy of the DEIR, nor does it contain any questions regarding the CEQA analysis. The comment is published in this FEIR for decision maker consideration.

The DEIR complies with all CEQA guidelines. CEQA does not require the submittal of environmental documents to individuals. Also, please refer to the response to comment I25, which further describes the public involvement process.
The commenter expresses many concerns about the project going forward, including the sizes and weight of the WTGs, impacts on roadways, and environmental damage associated with tree removal and grading. The commenter expresses the opinion that sediment would erode into the Eel River, causing damage to the salmon population. The commenter further believes that fully protected species would be impacted by the project and that the transmission lines would increase fire danger. The commenter notes “I really don’t want to see turbines on the hillside” and expresses opposition to the proposed project.

The County acknowledges the commenter’s opposition to the proposed project. This comment does not raise specific questions or request information that pertains to the adequacy of the DEIR for addressing adverse physical impacts associated with the project, nor does it contain an argument raising significant environmental issues.

A discussion of the effects of the project on special-status species and mitigation measures may be found in Section 3.5.3, “Environmental Impacts and Mitigation Measures” in Section 3.5, “Biological Resources,” and in Master Responses 2, “Marbled Murrelet”; 3, “Northern Spotted Owl”; 5, “Migratory and Special-Status Birds”; and 6, “Eagles and Other Raptors.” Fire danger is discussed in Master Response 11, “Wildfire.”
1106-1  The commenter is in support of the proposed project and indicates that “the project is well and thoughtfully designed.”

The support for the project is noted. This comment is not directed at the adequacy of the DEIR, nor does it contain any questions regarding the CEQA analysis. The comment is published in this FEIR for decision maker consideration. No further response is required.
I107-1  The commenters state that they have learned about health risks associated with wind turbines and “demand a stop to this Terra-Gen plan now.” The commenters also suggest that the County pass an ordinance addressing property value guarantees, turbine setbacks, environmental protections, and decommissioning plans.

This comment is not directed at the adequacy of the DEIR, nor does it contain any questions regarding the CEQA analysis. The comment is published in this FEIR for decision maker consideration. No further response is required.
1108-1 The commenter is opposed to the proposed project and expresses the opinion that the project is being rushed through without an adequate study of potential impacts on the environment, wildlife, and ecosystems.

This comment is not directed at the adequacy of the DEIR, nor does it contain any questions regarding the CEQA analysis. The comment is published in this FEIR for decision maker consideration.

The County believes that an adequate evaluation of resources has been done. Please see Section 3.5, “Biological Resources,” of the DEIR for discussions of environmental setting, impacts, and mitigation measures. Also, please note that additional surveys of species of concern have been completed since the circulation of the DEIR. These surveys are located in Appendix B of this FEIR.
The commenter believes that “the lack of public information concerning the involvement of Fields Landing in this project is disrespectful and possibly devious” and questions whether the freeway would be enlarged to allow for wider trucks to get into Humboldt County. The commenter opposes the use of Fields Landing for the proposed project.

This comment is not directed at the adequacy of the DEIR, nor does it contain any questions regarding the CEQA analysis. The comment is published in this FEIR for decision maker consideration.

The use of Fields Landing is described in Section 2.3.1, “Component Shipping and Staging,” of the DEIR. Please note that the size of barges entering the harbor is limited by the width of the jetty entrance and the depth of water in the harbor during low tide. In addition, the Port Captain would be involved in the delivery of all barges to the harbor. Although widening of the freeway is not contemplated as part of the proposed project, temporary off-ramps will be constructed to facilitate project-related traffic. Impacts associated with these temporary improvements are analyzed in the DEIR.
The commenter states that they saw no mention of Aleutian geese in the DEIR and wonders if they would be affected by changes in activity in the Fields Landing harbor. The commenter disagrees that there would be no changes to the harbor and questions whether crab fishers had provided input. The commenter opposes the project and indicates that “it is an invasion of my neighborhood and a misuse of the facilities of our harbor.” The commenter further questions whether land use restrictions have been evaluated and whether prevention of the project requires court intervention.

Aleutian cackling goose, which is a CDFW Watch List species, occurs in the Humboldt Bay region in the winter, and roosts and forages on Humboldt Bay National Wildlife Refuge pastures (USFWS 2018b). Table 3.5-5 (Special-Status Wildlife with Potential to Occur in the Biological Study Area) and Section 3.5 “Biological Resources” have been revised to add a discussion of Aleutian cackling geese. See Section 9.2 of the FEIR for a version of the revised section that shows the revisions. These revisions do not change the analysis or conclusions of the DEIR.

No persons identifying themselves as crab fishers have commented on the DEIR. Multiple opportunities for public comment have been provided over the course of this environmental review process and more will be offered when the project is considered by the Planning Commission at a public hearing. Please see the response to Comment I25-I for a summary of how the County and the applicant have provided opportunities for public comment.
The commenter believes that there are too many unanswered questions about the proposed project to permit it as quickly as the project applicant would like. The commenter recommends waiting for the FEIR and clarification of issues and additional information.

The commenter mentions unanswered questions and the need for clarification of issues, but does not identify any specifics; therefore, a specific response is not possible. The County acknowledges the commenter’s suggestion regarding waiting for the FEIR and notes that no decisions will be made until after publication and comment on this FEIR.
I112-1 The commenter expresses support for the project but considers the mitigation measures in the DEIR to be inadequate.

This comment is not directed at the overall adequacy of the DEIR, nor does it contain any specific questions regarding the CEQA analysis or identify specific mitigation measures that are considered inadequate. The comment is published in this FEIR for decision maker consideration. No further response is required.
I113-1 The commenter indicates that they believe that the comment period was too short and appreciates the extension of time.

This comment is not directed at the adequacy of the DEIR, nor does it contain any questions regarding the CEQA analysis. The comment is published in this FEIR for decision maker consideration. No further response is required.

I113-2 The commenter expresses concern about potential wildfires and requests information regarding planning for prevention. The commenter further states that the fire safety and management plan cannot be deferred and should be available “for study and inspection” prior to the project’s approval.

Please refer to Master Response 11, “Wildfire.”

I113-3 The commenter expresses concern regarding conflicts between the WTGs and aircraft and questions whether the project has been reviewed and approved by aviation authorities.

Section 2.4.2, “Public Access and Safety,” of the DEIR addresses Federal Aviation Administration (FAA) requirements for lighting on the proposed turbines. Through its Notice of Proposed Construction or Alteration (Form 7460.1), the FAA would conduct a review of the proposed project before construction begins (Title 14, Part 77 of the Code of Federal Regulations). The turbines proposed under all generation options would be more than 200 feet tall and therefore would require the appropriate obstruction lighting. However, the FAA may determine that the absence of marking and/or lighting would not threaten aviation. As a result of its review process, the FAA might recommend installing tower markings or aviation safety lighting on all or only a portion of the turbine towers.

I113-4 The commenter expresses further concerns about the project’s potential impacts on (1) the City of Rio Dell’s water quality, (2) grading of the land and roads, (3) wildlife, and (4) the plan to remove the structures after they have been decommissioned.

While the commenter states several concerns, no specifics were provided that could be responded to. Section 3.5.3, “Environmental Impacts and Mitigation Measures,” in Section 3.5, “Biological Resources,” of the DEIR describes the expected effects of the proposed project on wildlife. Water quality is addressed in Section 3.10, “Hydrology and Water Quality,” and decommissioning is discussed in Section 2.5, “Project Decommissioning and Restoration,” of the DEIR.
The commenter provides links to websites that, per the commenter, provide techniques to mitigate harm from large wind generators and asks that the applicant use them as part of their permit if the proposed project is approved.

This comment is not directed at the adequacy of the DEIR, nor does it contain any questions regarding the CEQA analysis. The comment is published in this FEIR for decision maker consideration. No further response is required.
I115-1  *The commenters state that the language in the DEIR is too vague and “too fraught with careless factual error” and further state that “it is difficult to accept [the EIR] as an adequate document.”*

The comments do not provide specific detail about which portions of the DEIR are too vague. This comment is not directed at the adequacy of the DEIR, nor does it contain any specific questions regarding the CEQA analysis. The comment is published in this FEIR for decision maker consideration. No further response is required.

I115-2  *The commenters indicate that while “viewshed” effects are important, the primary issue should be the considerable impact on the infrastructural environment of the proposed project.*

This comment is not directed at the adequacy of the DEIR, nor does it contain any specific questions regarding the CEQA analysis. The comment is published in this FEIR for decision maker consideration. No further response is required.

I115-3  *The commenters express the opinion that development of the proposed project would require a substantial quantity of fossil fuel and suggest that reducing carbon emissions is not the project applicant’s real priority.  

Please see Master Response 9, “Adequacy of the Greenhouse Gas Analysis.”*

I115-4  *The commenters express the opinion that the tree removal required for the transmission line would result in considerable environmental disturbance.  

This comment is not directed at the adequacy of the DEIR, nor does it contain any specific questions regarding the CEQA analysis. The comment is published in this FEIR for decision maker consideration. 

Mitigation Measure 3.5-4 (Develop and Submit a Reclamation, Revegetation and Weed Control Plan) includes a tree replacement plan for any trees removed as part of vegetation clearing.  

I115-5  *The commenters question the motives of the project applicant and express the opinion that destruction of the local environment to protect the global environment is meaningless.  

This comment is not directed at the adequacy of the DEIR, nor does it contain any specific questions regarding the CEQA analysis. The comment is published in this FEIR for decision maker consideration. No further response is required.*
116-1  *The commenter is in favor of the proposed project and expresses the opinion that the objections to the project are weak and unscientific, whereas the benefits would be great.*

This comment is not directed at the adequacy of the DEIR, nor does it contain any questions regarding the CEQA analysis. The comment is published in this FEIR for decision maker consideration. No further response is required.
The commenter says no to the proposed project.

The County acknowledges the commenter’s opposition to the proposed project. This comment does not raise specific questions or request information that pertains to the adequacy of the DEIR for addressing adverse physical impacts associated with the project, nor does it contain an argument raising significant environmental issues. No further response is required.
The commenter states that after consideration of recent climate reports, their opinion is that there is no time to delay the proposed project.

The support for the comment is noted. This comment is not directed at the adequacy of the DEIR, nor does it contain any questions regarding the CEQA analysis. The comment is published in this FEIR for decision maker consideration. No further response is required.
The commenter indicates that “bladeless” wind turbines work more efficiently and recommends that the County research them.

This comment is not directed at the adequacy of the DEIR, nor does it contain any questions regarding the CEQA analysis. The comment is published in this FEIR for decision maker consideration. No further response is required.

Please see Master Response 11, “Alternatives Considered,” for a discussion of alternative wind technologies that were considered during concept design.
1120-1 The commenter expresses great concern about the proposed project. In addition to issues brought up in Form Letter A (see 1120-2), the commenter expresses the opinion that the turbine bases would consume a “huge amount of cement” and would be permanent. The commenter also believes that the 17 miles of roadway and the gen-tie would require logging and herbicide use.

This comment is not directed at the adequacy of the DEIR, nor does it contain any questions regarding the CEQA analysis. The comment is published in this FEIR for decision maker consideration. No further response is required.

Mitigation Measure 3.5-4 (Develop and Submit a Reclamation, Revegetation, and Weed Control Plan) addresses the management of noxious weeds during the construction and operation of the proposed project. The Reclamation, Revegetation, and Weed Control Plan, which is provided in Appendix B of this FEIR, does not explicitly prescribe which herbicides might be used, but notes that all treatment methods for the control of weeds—including the use of herbicides—will be conducted in accordance with the law, regulations, and policies governing the land where the treatment will occur. Landowners would be notified prior to the project’s use of herbicides.

1120-2 This portion of the comment is a copy of Form letter A.

Please see Chapter 8b of this FEIR, which contains the response to Form Letter A comments.
I121-1  The commenter is opposed to the proposed project and states the opinion that sound generated by the turbines would cause ongoing damage to the environment and wildlife. The commenter is also concerned the proposed project was fast tracked.

The DEIR includes a thorough analysis of noise and vibration impacts of the project. Chapter 3.11, “Noise,” of the DEIR evaluates expected project impacts associated with noise and vibration and provides mitigation measures when necessary. Mitigation Measure 3.15-1a stipulates the use of noise-reducing construction practices to minimize temporary construction noise. Most operational noise was determined to be less than significant without any mitigation, with the exception of noise generated by the wind turbines themselves, which is addressed by Mitigation Measure 3.15-3 (Implement Noise Reducing Turbine Operations). Vibration impacts would be generated only during construction and thus would be temporary; the vibration effects were determined to be less than significant.

As discussed in Impact 3.11-3 (Long-Term Increases in Project-Generated Noise), the operation of WTGs at the proposed substation site would not cause a substantial permanent increase in low-frequency and infrasonic noise above levels existing without the project. The DEIR concluded that the long-term impact of low-frequency and infrasonic noise from WTG operation would be less than significant.

The commenter states that the project is being fast tracked by the County. Please see Master Response 1, “Site Planning and Avoidance Measures,” for further information on the history and siting of the proposed project. The County has also provided multiple opportunities for public comment over the course of this environmental review process, which began on July 3, 2018, and more will be offered when the project is considered by the Planning Commission at a public hearing. Please see the response to Comment I25-1, which describes the extensive public noticing and public review period for the DEIR.
The commenter expresses support for the proposed project. The commenter states that the environmental impacts to road building should be as minimal as possible.

The commenter expresses support for the proposed project. This comment is not directed at the adequacy of the DEIR for addressing adverse physical impacts associated with the project, nor does it contain an argument raising significant environmental issues.

I123-1 The commenter states that the proposed project would generate noise that restricts the use of property surrounding the turbines, states that the project applicant should pay for highway wear and tear, and states that the project applicant should pay for the increased demand for police services. The commenter also states that the proposed project would severely impact wildlife.

Calculations of noise and vibration levels are provided in Section 3.11, “Noise.” As discussed in Impact 3.11-3 (Long-Term Increases in Project-Generated Noise), the operations noise analysis conducted for the proposed project was based on all 60 WGTs operating simultaneously with a maximum sound power level that represents the loudest, or worst-case, turbine that is expected to be used at the project site. The analysis determined that the predicted noise levels would comply with applicable standards for local exterior noise for residential land uses except at one sensitive receptor. Mitigation Measure 3.11-2 (Implement Noise-Reducing Wind Turbine Generator Operations) would ensure that long-term impacts from project-generated noise at this sensitive receptor would be reduced to a less than significant level. Please also see the response to Comment I121-1.

Section 3.12, “Transportation and Traffic,” in the DEIR analyzes the proposed project’s impacts on traffic. A construction traffic management plan must be prepared as a condition of the project. That plan would identify haul routes, construction worker traffic patterns, and detour routes for implementation during the transportation of heavy project components. Mitigation measures identified in Section 3.12, “Transportation and Traffic,” of the DEIR require the construction contractor to obtain Caltrans permits for wide and heavy loads.

Regarding impacts on wildlife, as described in Section 3.5, “Biological Resources,” the DEIR has committed the County to the required mitigation measures, presented clear performance standards that have been refined in FEIR, and described the means of mitigating impacts that would achieve the performance standards. Please also see Master Responses 2 through 8 for additional details related to the analysis of impacts in biological resources and further refinements to some of the mitigation measures.

In addition, since the circulation of the DEIR, the project applicant has refined the footprint of the proposed project to avoid or minimize impacts on sensitive resources. Please see Master Response 1, “Site Planning and Avoidance Measures,” and “Refinements to the Project Description Since Circulation of the DEIR” in Chapter 1 of this FEIR for the specific refinements that were made to the project description since circulation of the DEIR.
I124-1  The commenter expresses opposition to the proposed project. The commenter expresses the opinion that the proposed project threatens wildlife, including birds and bats; disrupts old growth trees; and produces light pollution.

The commenter expresses opposition to the proposed project. This comment is not directed at the adequacy of the DEIR for addressing adverse physical impacts associated with the project, nor does it contain an argument raising significant environmental issues.

As described in Section 3.5, “Biological Resources,” the DEIR has committed the County to the required mitigation measures, presented clear performance standards that have been refined in FEIR, and described the means of mitigating impacts that would achieve the performance standards. Please also see Master Responses 2 through 8 for additional details related to the analysis of impacts on biological resources, a discussion of additional surveys conducted since circulation of the DEIR, and additional refinements to the mitigation measures in the DEIR.

Master Response 10, “Wildfire,” provides further discussion of the regulatory requirements and mitigation measures that reduce the potential for wildfires. Please see the responses to Comments R3-8, R3-9, R3-10, and R3-18, which address light pollution. Please see the responses to Comments I121-1 and I123-1, which address noise and vibration. In addition, since the circulation of the DEIR, the project applicant has refined the footprint of the proposed project to avoid or minimize impacts to sensitive resources. Please see Master Response 1, “Site Planning and Avoidance Measures,” and “Refinements to the Project Description Since Circulation of the DEIR” in Chapter 1 of this FEIR for the specific refinements that were made to the project description since the circulation of the DEIR.
1125-1  The commenter expresses opposition to the proposed project. The commenter expresses the opinion that taxes or electricity bills would be raised and that most of the electricity produced would be transferred south. The commenter notes that the Wiyot consider the project site to be sacred land. The commenter also expresses the opinion that fire hazards would increase due to a decrease in humidity east of each turbine and that the DEIR does not provide information regarding the source of water to fight fires. Lastly, the commenter believes that the DEIR does not address vibration and its effects.

Please also refer to the response to comment letter T2 for specific responses to comments submitted by the Wiyot Tribe. Please see the responses to Comment I21-1 regarding energy generation and distribution. Section 3.13, “Fire Protection Services and Wildfire Hazards,” of the DEIR provides information related to firefighting capabilities and readiness, and Master Response 10, “Wildfire,” in this FEIR provides further discussion of regulatory requirements and mitigation measures that would reduce the potential for wildfires. Please see the responses to Comments I121-1 and I123-1, which address noise and vibration.

In addition, since the circulation of the DEIR, the project applicant has refined the footprint of the proposed project to avoid or minimize impacts to sensitive resources. Please see Master Response 1, “Site Planning and Avoidance Measures,” and “Refinements to the Project Description Since Circulation of the DEIR” in Chapter 1 of this FEIR for the specific refinements that were made to the project description since the circulation of the DEIR.

The commenter expresses opinions regarding taxes and energy bills. The purpose of the DEIR is to identify the significant effects of the proposed project on the physical environment and the DEIR is not intended to address social or economic impacts. “An economic or social change by itself shall not be considered a significant effect on the environment” (CEQA Guidelines Sections 15131 and 15382).
1126-1  The commenter opposes the proposed project and expresses the opinion that the DEIR is weak. The commenter also expresses the opinion that most employment would be outsourced and there would be little benefit to Humboldt County residents. The commenter also states that the project would create fire danger, kill protected wildlife, and cause destruction of the environment.

The commenter provides an opinion regarding the adequacy of the DEIR, but neither identifies nor provides examples of why or how the DEIR is weak.

As described in Section 3.5, “Biological Resources,” the DEIR has committed the County to the required mitigation measures, presented clear performance standards that have been refined in FEIR, and described the means of mitigating impacts that would achieve the performance standards. Please also see Master Responses 2 through 8 for additional details related to the analysis of impacts on biological resources, a discussion of additional surveys conducted since circulation of the DEIR, and additional refinements to the mitigation measures in the DEIR.

Please see the response to Comment I21-1 regarding energy generation and distribution. Please see Master Response 10, “Wildfire,” in this FEIR for further discussion of regulatory requirements and mitigation measures that reduce the potential for wildfires.

In addition, since the circulation of the DEIR, the project applicant has refined the footprint of the proposed project to avoid or minimize impacts to sensitive resources. Please see Master Response 1, “Site Planning and Avoidance Measures,” and “Refinements to the Project Description Since Circulation of the DEIR,” in Chapter 1 of this FEIR for the specific refinements that were made to the project description since the circulation of the DEIR.
The commenter opposes the proposed project and states that the project is opposed by the Wiyot tribe. The commenter also expresses the opinion that the project doesn’t serve the long-term goals of sustainability and conservation and that wind turbines have significant environmental effects. The commenter concludes by recommending that education and action aimed at reducing energy usage is key.

This comment letter is a duplicate of comment letter I103. Please see the response to Comment I103-1.
1128-1 The commenters express opposition to the proposed project. The commenters state that tourism generates income for Humboldt County. The commenter further states that tax revenues will not enhance what you have.

This comment is not directed at the adequacy of the DEIR, nor does it contain any questions regarding the CEQA analysis. The comment is published in this FEIR for decision maker consideration.

The commenter expresses opinions regarding income from tourism and tax revenue. The purpose of this DEIR is to identify the significant effects of the proposed project on the physical environment and this DEIR is not intended to address social or economic impacts. “An economic or social change by itself shall not be considered a significant effect on the environment” (CEQA Guidelines Sections 15131 and 15382).
I129-1  The commenter provides an opinion regarding various aspects of Fields Landing and the harbor and indicates that the boat ramp there is not intended for the use [Terra-Gen is] taking for granted (sic). The commenter also expresses opinions regarding the presence of a nearby wildlife refuge, existence of the area in a tsunami zone, the area’s vulnerability to earthquakes, and that project activities would destroy the character of the neighborhood. The commenter questions whether the Wiyot Tribe or Coastal Commission have provided input.

This comment is not directed at the adequacy of the DEIR, nor does it contain any questions regarding the CEQA analysis. The comment is published in this FEIR for decision maker consideration.

Aleutian cackling goose, which is a CDFW Watch List species, occurs in the Humboldt Bay region in the winter, and roosts and forages on Humboldt Bay National Wildlife Refuge pastures (USFWS 2018b). Table 3.5-5: Special-Status Wildlife with Potential to Occur in the Biological Study Area, and Section 3.5 “Biological Resources,” have been revised to add a discussion of Aleutian cackling geese. See Section 9.2 of the FEIR for a version of this revision that shows the modifications that have been made.

The DEIR addresses impacts on biological resources in Section 3.5, “Biological Resources,” and earthquakes and tsunamis are discussed in Section 3.7 “Geology and Soils,” in the DEIR.

The use of Fields Landing is described in Section 2.3.1, “Component Shipping and Staging,” of the DEIR. Please note that the size of barges entering the harbor is limited by the width of the jetty entrance and water depth in the harbor during low tide. In addition, the Port Captain would be involved in the delivery of all barges to the harbor.

Please refer to the response to comment letter S5 for specific responses submitted by the California Coastal Commission. Please also refer to the response to comment letter T2 for specific responses to comments submitted by the Wiyot Tribe.
1130-1  *The commenter notes that the proposed project would ship equipment across Humboldt Bay and unload it at Fields Landing onto large trucks. The commenter states that a North Coast Journal article regarding the proposed project directed readers to the DEIR. The commenter also expresses the opinion that there was no notification to the community of a meeting to provide input to the project.*

The commenter opposes the proposed project. This comment is not directed at the adequacy of the DEIR, nor does it contain any questions regarding the CEQA analysis. The comment is published in this FEIR for decision maker consideration.

The County has also provided multiple opportunities for public comment have been provided over the course of this environmental review process, which began on July 3, 2018, and more will be offered when the project is considered by the Planning Commission at a public hearing. Please see the response to Comment I25-1, which describes the extensive public noticing and public review period for the DEIR.
The commenter expresses opposition to the proposed project and believes the proposed project would result in many negative impacts, particularly to raptors.

The commenter opposes the proposed project. This comment is not directed at the adequacy of the DEIR, nor does it contain any questions regarding the CEQA analysis. The comment is published in this FEIR for decision maker consideration.

Impacts on birds, including raptors, are discussed in Section 3.5, “Biological Resources,” of the DEIR, as well as Master Response 5, “Migratory and Special-Status Birds,” and Master Response 6, “Eagles and Other Raptors.”
The commenter expresses opposition for the proposed project and supports the No Project Alternative. The commenter cites information by a biologist of tribal concerns and states there is no way to measure the loss of plant diversity. The commenter asks questions and expresses concerns about birds, including brown pelican, golden eagle, bald eagle, white-tailed kite, American peregrine falcon, and California condor; carbon sequestration; and views from Bear River Ridge. The commenter states that the proposed project would not increase job growth in Humboldt County.

The commenter cites information provided by a biologist for tribal concerns. CEQA does not require a lead agency to conduct every test or perform all research, study, and experimentation recommended or demanded by commenters. In reviewing draft EIRs, persons and public agencies should focus on the sufficiency of the document in identifying and analyzing the possible impacts on the environment and ways in which the significant effects of the project might be avoided or mitigated (CEQA Guidelines Section 15204).

Please see Master Response 2, “Marbled Murrelet,” for a description of the updated Humboldt Wind Energy Project Marbled Murrelet Survey Report, which is also included in Appendix B of this FEIR. Please also see Master Response 5, “Migratory and Special-status Birds,” and Master Response 6, “Eagles and Other Raptors,” for additional information on bird impacts and mitigation, refined since circulation of the DEIR. Regarding concerns about condors, please see the response to Comment I65-1. Please also see Master Response 7, “Special-Status Plants and Sensitive Plan Communities,” for additional information regarding the effects of the proposed project on sensitive plant communities and proposed mitigation.

Please see Master Response 9, “Adequacy of the Greenhouse Gas Analysis,” for additional in-depth information regarding the adequacy of the greenhouse gas analysis, which includes a discussion of carbon sequestration. Please see the response to comment letter I12, which addresses aesthetics and views of the project site.

In addition, the project applicant has refined the footprint of the proposed project to avoid or minimize impacts on sensitive resources since circulation of the DEIR. Please see Master Response 1, “Site Planning and Avoidance Measures” and “Refinements to the Project Description Since Circulation of the DEIR” in Chapter 1 of this FEIR for the specific refinements that have been made to the project description since circulation of the DEIR.

The commenter states that the proposed project does not support job growth. The purpose of this DEIR is to identify the significant effects of the proposed project on the physical environment and this DEIR is not intended to address social or economic impacts. “An economic or social change by itself shall not be considered a significant effect on the environment” (CEQA Guidelines Sections 15131 and 15382).

The commenter believes that the new groundwater well would affect the commenter’s and neighbors’ wells. The commenter states the increased use of the Pepperwood Basin water supply could only impact
them more. The commenter further states the mitigation for fire danger was not adequately met nor available for public preview in the DEIR.

Water use required during construction and operation of the proposed project is discussed in Section 3.1.3, “Utilities,” of Chapter 3, “Environmental Setting, Impacts, and Mitigation Measures,” of the DEIR. As discussed in Section 3.1.3, one new potable groundwater well would be constructed to meet the potable water supply demands of the proposed project. Groundwater would be pumped from the Pepperwood Town Area Groundwater Basin. As shown in Table 3.1-1, adequate supplies are available to serve the proposed project as well as existing and planned future uses, including agricultural and manufacturing uses, under all water year conditions. The California Department of Water Resources determined there were no substantial impacts on the Pepperwood Town Area Groundwater Basin based on this current groundwater use.

Section 3.13, “Fire Protection Services and Wildfire Hazards,” of the DEIR provides information related to firefighting capabilities and readiness. Please also see Master Response 10, “Wildfire,” of this FEIR for further discussion of how the project proposed to reduce the risk of potential for wildfires.

The commenter states that even though the DEIR states that the transportation of turbine components will mostly be done at night to reduce traffic interruption, the lack of, or disturbance of access to this exit is yet to be measured. The commenter further states that there are significant and unavoidable impacts and the benefits stated do not outweigh or even balance the negative impacts that would result if the project goes forward.

As discussed in Section 3.12, “Transportation and Traffic,” of the DEIR, a construction traffic management plan must be prepared as a condition of the project. That plan would identify haul routes, construction worker traffic patterns, and detour routes for implementation during transportation of heavy project components.

When a lead agency approves a project that would result in significant and unavoidable impacts (i.e., cannot be reduced to a less-than-significant level) that are disclosed in the EIR, CEQA requires the decision-making body to balance the economic, legal, social, technological, or other benefits of the proposed project against its unavoidable environmental risks and state in writing its reasons for supporting the action (CEQA Guidelines Sections 15093). This statement of overriding considerations must be supported by substantial information in the record. The County may approve the project even though the project would cause a significant effect on the environment if the County makes a fully informed and publicly disclosed decision that shows there is no feasible way to lessen or avoid the significant effect and identifies how the expected benefits from the project outweigh the significant and unavoidable environmental impacts of the project (CEQA Guidelines Section 15043).
The commenter states that the DEIR appears incomplete. The commenter states that the Visual Resources Technical Report did not identify a gen-tie alignment and the visual impacts of the gen-tie alignment were not included in the DEIR.

The Visual Resources Technical Report prepared for the project focused on the wind turbines. Impact 3.2-1 (Project Impacts on Scenic Vistas and Potential for Substantial Degradation of Existing Visual Character or Quality of Public Views of the Site and Surroundings) in Section 3.2, “Aesthetics,” of the DEIR identifies the location of the gen-tie alignment and describes public views of the gen-tie line. Mitigation Measure 3.2-1a (Design the Project to Avoid Aesthetic Impacts) would reduce impacts associated with the gen-tie line because overhead transmission lines will not use lattice steel towers, and in lieu of H-frame wooden structures, tubular steel poles or concrete poles may be used and will be painted light grey or shall be dulled galvanized steel or other nonreflective surface. However, as stated in Section 3.2, there are no additional feasible mitigation measures to reduce visual impacts to a less-than-significant level. Therefore, the impact on visual resources would be significant and unavoidable.

In addition, the project applicant has refined and narrowed the footprint of the proposed project to further avoid or minimize impacts since circulation of the DEIR. Since the publication of the DEIR, the applicant has proposed a reduction in the number of wind turbine generators from 60 to 47, and the gen-tie alignment has been shortened by several miles and co-located with existing roads where possible. Please see “Refinements to the Project Description Since Circulation of the DEIR” in Chapter 1 of this FEIR for the specific refinements to the project description, including the gen-tie, that have been made since circulation of the DEIR.
The commenters oppose the proposed project and express the opinion that it would have a negative impact on their community. The commenters further state the belief that the transmission lines create extremely high fire risks. They list other concerns they believe warrant denial of the project, including water use, road construction, and noise and vibration, and express the opinion that the project hasn’t been studied enough and should not be on a fast track.

Water use required during construction and operation of the proposed project is discussed in Section 3.1.3, “Utilities,” of Chapter 3, “Environmental Setting, Impacts, and Mitigation Measures,” of the DEIR. Master Response 10, “Wildfire,” in this FEIR provides further discussion of regulatory requirements and mitigation measures that reduce the potential for wildfires. Please see the response to Comment I87-2 regarding impacts from roads. Please also see the responses to Comments I121-1 and I123-1, which address noise and vibration. Additional technical studies to support the conclusions of the DEIR have been prepared since circulation of the DEIR and are included in Appendix B of this FEIR.

In addition, since the circulation of the DEIR, the project applicant has refined the footprint of the proposed project to avoid or minimize impacts to sensitive resources. Please see Master Response 1, “Site Planning and Avoidance Measures,” and “Refinements to the Project Description Since Circulation of the DEIR” in Chapter 1 of this FEIR for the specific refinements that were made to the project description since the circulation of the DEIR.

The commenter states the project is being fast tracked by the County. Please see Master Response 1 “Site Planning and Avoidance Measures,” for further information on the history and siting of the proposed project. Please see the response to Comment I25-1, which describes the extensive public notice and public review period for the DEIR.
The commenter expresses support for the proposed project and believes the project is well and thoughtfully designed and should be approved.

The commenter’s support for the proposed project is noted. This comment is not directed at the adequacy of the DEIR, nor does it contain any questions regarding the CEQA analysis. The comment is published in this FEIR for decision maker consideration. No further response is required.
1136-1  The commenter expresses opposition to the proposed project and states the project will damage the surrounding environment and wildlife and ecosystem.

This comment is not directed at the adequacy of the DEIR, nor does it contain any questions regarding the CEQA analysis. The comment is published in this FEIR for decision maker consideration.

The DEIR addresses all impacts on biological resources in Section 3.5, “Biological Resources.” In addition, the project applicant has refined the footprint of the proposed project to avoid or minimize impacts on sensitive resources since circulation of the DEIR. Please see “Refinements to the Project Description Since Circulation of the DEIR” in Chapter 1 of this DEIR for a description of the refinements made since circulation of the DEIR.
1137-1 The commenter expresses opposition to the proposed project. The commenter states that the proposed project is damaging to wildlife and summarizes the impacts cited in the DEIR regarding horned larks, raptors, bats, marbled murrelets, and bald and golden eagles.

As described in Section 3.5, “Biological Resources,” the DEIR has committed the County to the required mitigation measures, presented clear performance standards that have been refined in FEIR, and described the means of mitigating impacts that would achieve the performance standards. Please also see Master Responses 2 through 8 for additional details related to the analysis of impacts on biological resources, a discussion of additional surveys conducted since circulation of the DEIR, and additional refinements to the mitigation measures in the DEIR.

In addition, since the circulation of the DEIR, the project applicant has refined the footprint of the proposed project to avoid or minimize impacts to sensitive resources. Please see Master Response 1, “Site Planning and Avoidance Measures,” and “Refinements to the Project Description Since Circulation of the DEIR” in Chapter 1 of this FEIR for the specific refinements that have been made to the project description since the circulation of the DEIR.
The commenter is opposed to the proposed project and supports the No Project Alternative. The commenter includes numerous concerns, such as roads, aesthetics, cultural resources, erosion, birds and bats, and carbon emissions, that they believe would result from the proposed project. The commenter states that there are significant and unavoidable negative impacts that are not outweighed by any projected positive results.


Regarding impacts to wildlife, as described in Section 3.5, “Biological Resources,” the DEIR has committed the County to the required mitigation measures, has presented clear performance standards that have been further refined in this FEIR, and has described the means of mitigating impacts that would achieve the performance standards. Please also see Master Responses 2 through 8 for additional details related to the analysis of impacts on biological resources, a discussion of additional surveys conducted since circulation of the DEIR, and additional refinements to the mitigation measures in the DEIR.

In addition, since the circulation of the DEIR, the project applicant has refined the footprint of the proposed project to avoid or minimize impacts to sensitive resources. Please see Master Response 1, “Site Planning and Avoidance Measures,” and “Refinements to the Project Description Since Circulation of the DEIR” in Chapter 1 of this FEIR for the specific refinements that were made to the project description since the circulation of the DEIR.

When a lead agency approves a project that would result in significant and unavoidable impacts (i.e., cannot be reduced to a less-than-significant level) that are disclosed in the EIR, CEQA requires the decision-making body to balance, the economic, legal, social, technological, or other benefits of the proposed project against its unavoidable environmental risks and state in writing its reasons for supporting the action (CEQA Guidelines Sections 15093). This statement of overriding considerations must be supported by substantial information in the record. The County may approve the project even though the project would cause a significant effect on the environment if the County makes a fully informed and publicly disclosed decision that shows there is no feasible way to lessen or avoid the significant effect and identifies how the expected benefits from the project outweigh the significant and unavoidable environmental impacts of the project (CEQA Guidelines Section 15043).
1139-1 The commenter offers to provide web development.

The comment is unrelated to proposed project. No further response is required.
The commenter supports the Californians for Alternatives to Toxics request for an extension of the review period.

This comment is not directed at the adequacy of the DEIR, nor does it contain any questions regarding the CEQA analysis. The comment is published in this FEIR for decision maker consideration.

Please also refer to the response to comment letter O3 for specific responses to comments submitted by the Californians for Alternative to Toxics.
The commenter expresses concern that Monument Road would become a short cut for construction and maintenance workers and that this would lead to unsafe conditions.

Section 3.12, “Transportation and Traffic,” of the DEIR which addresses traffic and emergency access. The designation of Monument Road would not change as a result of the project. The project applicant is required to prepare a traffic management plan that will address safe ingress and egress to the project site, including during construction.

The commenters believe that construction and maintenance of the proposed project would result in polluted runoff that would drain to residents’ pastures and affect domestic water supplies.

Please see the response to Comment 171-7 for a discussion of runoff during construction and operation of the proposed project. Please also see Section 3.10, “Hydrology and Water Quality,” in the DEIR, which addresses project impacts on water quality.

The commenters express concern over an increase in fire risk.

Section 3.13, “Fire Protection Services and Wildfire Hazards,” of the DEIR provides information related to wildfire and Master Response 10, “Wildfire,” of this FEIR provides further discussion of the history of wildfire in the region and regulatory requirements and mitigation measures that reduce the potential for wildfires. These issues have been adequately addressed in the DEIR and FEIR and no further changes are necessary.

The commenters state that Monument Road and Bear River Ridge Road serve as emergency access for many county residents and believe the proposed project may adversely affect the ability of residents to safely utilize this route.

Please see the response to Comment 1141-1.

The commenters express the opinion that the DEIR inadequately addresses short- and long-term impacts on wildlife.

As described in Section 3.5, “Biological Resources,” the DEIR has committed the County to the required mitigation measures, has presented clear performance standards that have been further refined in this FEIR, and has described the means of mitigating impacts that would achieve the performance standards. Please also see Master Responses 2 through 8 for additional detail related to the analysis of impacts on biological resources and discussion on additional surveys conducted since circulation of the DEIR and for additional refinements to the mitigation measures in the DEIR.

In addition, the project applicant has refined the footprint of the proposed project to avoid or minimize impacts on sensitive resources since circulation of the DEIR. Please see Master Response 1, “Site Planning and Avoidance Measures” and “Refinements to the Project Description Since Circulation of the
DEIR” in Chapter 1 of this FEIR for the specific refinements that have been made to the project description since circulation of the DEIR.

II41-6 The commenters believe that the proposed project would not serve Humboldt County as a whole, would create few local jobs, that the electricity generated would not stay in the county, and that project infrastructure will remain after the project is abandoned.

The purpose of this DEIR is to identify the significant effects of the proposed project on the physical environment and this DEIR is not intended to address social or economic impacts. “An economic or social change by itself shall not be considered a significant effect on the environment” (CEQA Guidelines Sections 15131 and 15382).

Please see the responses to Comments II45-1, II49-3, II71-9, and II76-3, related to the decommissioning of the proposed project. The response to Comment letter I21 addresses electricity distribution.
I142-1 The commenter expresses opposition to the proposed project. The commenter believes the proposed project could result in an additional 60,000 homes being built in the County. The commenter states the proposed project should not destroy habitat for animals, human population, or terrain with vegetation that maintains the health and stability of the area such as the slopes, watersheds, and ridgelines proposed for this project. The commenter further states the project is in a seismically active area of California.

This comment does not raise specific questions or request information that pertains to the adequacy of the DEIR for addressing adverse physical impacts associated with the project, nor does it contain an argument raising significant environmental issues. This comment is published in this Response to Comments document for public disclosure and for decision maker consideration.


The commenter states 60,000 homes could be supported by the proposed project but does not identify the source of this information. The DEIR does not indicate that the proposed project would induce growth, including residential growth. Please see Chapter 5, “Other CEQA Requirements,” of the DEIR.
I143-1 The commenter states alternatives to Fields Landing such as the use of existing commercial harbors in and around Eureka are not provided.

Use of Fields Landing is described in Section 2.3.1, “Component Shipping and Staging,” of the DEIR. Please note that the size of barges entering the harbor is limited by the width of the jetty entrance and water depth in the harbor during low tide. In addition, the Port Captain would be involved in delivery of all barges to the harbor. Fields Landing is the closest commercial potential delivery site for project components, and other Alternatives were not studied because they would substantially lengthen the haul route and result in transport through more urban areas.
The commenter expresses support for the proposed project.

The support for the project is noted. This comment is not directed at the adequacy of the DEIR, nor does it contain an argument raising significant environmental issues. No further response is required.
1145-1 The commenter expresses opposition to the proposed project. The commenter expresses the opinion that the proposed road up Jordan Creek would degrade the Eel River and asks if the “2 acre feet” (sic) of water to build the concrete pads would come from the Eel River. The commenter expresses opposition to turbine blades in the marbled murrelet flyway. The commenter states energy will be sent out in grid and purchased by the highest bidder, that roads should be fixed often, and that no new sediment be input to Jordan or Bear River Creeks. The commenter concludes with a number of questions regarding noise and vibration, imported workers, waste removal after decommissioning, and increased fire risk.

The commenter expresses opposition to the proposed project. This comment is not directed at the adequacy of the DEIR, nor does it contain any questions regarding the CEQA analysis. The comment is published in this FEIR for decision maker consideration.

Section 3.10, “Hydrology and Water Quality,” of the DEIR analyzes the potential for erosion and sedimentation into the Eel River and Jordan and Bear Creeks. Water use required during construction and operation of the proposed project and disposal of waste is discussed in Section 3.1.3, “Utilities,” of Chapter 3, “Environmental Setting, Impacts, and Mitigation Measures,” of the DEIR. Section 3.13, “Fire Protection Services and Wildfire Hazards,” of the DEIR provides information related wildfire and Master Response 10, “Wildfire,” of this FEIR provides further discussion of the history of wildfire in the region and regulatory requirements and mitigation measures that reduce the potential for wildfires. The response to comment letter I21 addresses electricity distribution. Please see the response to Comment I87-2 regarding impacts from roads. Please see the responses to Comments I121-1 and I123-1, which address noise and vibration.

Please also see Master Response 1, “Site Planning and Avoidance Measures,” for a summary of project siting, planning, and design criteria, including siting criteria considered to avoid and minimize impacts on marbled murrelets. Master Response 2, “Marbled Murrelet,” provides updated marbled murrelet survey results and additional information on the proposed mitigation measures for marbled murrelets.

In addition, the project applicant has refined the footprint of the proposed project to avoid or minimize impacts on sensitive resources since circulation of the DEIR. Please see Master Response 1, “Site Planning and Avoidance Measures” and “Refinements to the Project Description Since Circulation of the DEIR” in Chapter 1 of this FEIR for the specific refinements to the project description that were made since circulation of the DEIR.

Project decommissioning is discussed in Section 2.5, “Project Decommissioning and Restoration,” in Chapter 2, “Project Description,” of the DEIR. As stated in Section 2.5, upon decommissioning of the facility, the WTGs would be removed from the project site, and the materials would be reused or sold for scrap.
The commenters express support for the proposed project and believe the project is an opportunity to contribute to the global good by switching to local low-carbon energy. The commenters discuss the importance of wind energy and reducing carbon emissions.

The support for the project is noted. This comment does not raise specific questions or request information that pertains to the adequacy of the DEIR for addressing adverse physical impacts associated with the project, nor does it contain an argument raising significant environmental issues. This comment is published in this Response to Comments document for public disclosure and for decision maker consideration. No further response is required.
The commenter states the pros and cons of the proposed project should be studied and asks that the County follow the science.

The County believes that an adequate evaluation of the project’s impact on all resources has been completed. The DEIR addresses the full suite of environmental impacts resulting from implementation of the proposed project. Please see Sections 3.2, “Aesthetics”; 3.3, “Agricultural and Forestry Resources”; 3.4, “Air Quality”; 3.5, “Biological Resources”; 3.7, “Geology and Soils”; 3.8, “Greenhouse Gas Emissions”; 3.9, “Hazards and Hazardous Materials”; 3.10, “Hydrology and Water Quality”; 3.11, “Noise”; and 3.12, “Transportation and Traffic” in the DEIR for an analysis of the project’s impact on these resources, and for specific mitigation measures related to impacts on these resources. Numerous technical studies were prepared and relied upon during preparation of the DEIR. A list of additional technical studies completed since circulation of the DEIR is included in Chapter 1 of this FEIR and these studies are included in Appendix B of this FEIR, as appropriate.
The commenter states he is a retired professor of anthropology and archaeology from Michigan State University. The commenter summarizes a research project he led in 1978 for the proposed Gasquet-Orleans Road across the Siskiyou Mountains. The commenter states that the research project identified more than 80 Yurok sites in the area. The commenter cites additional reports and literature that identified sacred cultural sites along Siskiyou Mountain crestlines and states the Siskiyou Mountains are likely relevant to any evaluation of the Monument and Bear River Ridge as a location for wind turbines. The commenter states that the Monument and Bear Ridge area is partly in the traditional region of the Wiyot and Yurok, and it is likely that important archaeological religious sites may well exist along the crestlines and upper slopes of Monument and Bear River Ridges.

Consistent with the requirements of CEQA, Humboldt County (County) initiated Assembly Bill (AB) 52 consultation via letter on July 13, 2018, with the Big Lagoon Rancheria, the Hoopa Valley Tribe, the Bear River Band of the Rohnerville Rancheria, the Wiyot Tribe, and the Cher-Ae Heights Indian Community of the Trinidad Rancheria. This letter served as a formal invitation to the tribes to consult with the County regarding the conditional use permit application for the proposed Humboldt Wind Energy Project, pursuant to Public Resources Code (PRC) Section 21080.3.1. See Section 3.6, “Cultural Resources, including Tribal Cultural Resources,” of the DEIR for a detailed summary of consultation with these tribes regarding tribal cultural resources in the project area. Tribal consultation has been ongoing, and additional cultural resource studies have been conducted in support of project refinements discussed in this FEIR.

Please also refer to the response to comment letter T1 for specific responses to comments submitted by the Yurok Tribe and response to comment letter T2 for specific responses to comments submitted by the Wiyot Tribe.

It should be noted that CEQA does not require a lead agency to conduct every test or perform all research, study, and experimentation recommended or demanded by commenters. In reviewing draft EIRs, persons and public agencies should focus on the sufficiency of the document in identifying and analyzing the possible impacts on the environment and ways in which the significant effects of the project might be avoided or mitigated (CEQA Guidelines Section 15204).

An EIR is not inadequate simply because experts in a particular environmental subject matter dispute the conclusions reached by the experts whose studies were used in drafting the EIR, even where different conclusions can reasonably be drawn from a single pool of information. (CEQA Guidelines Section 15151; Guide to the California Environmental Quality Act [CEQA] [Remy et al. 2007:499–500]; Greenebaum v. City of Los Angeles [1984] 153 Cal. App. 3d 391, 413.) Perfection is not required, but the EIR must be adequate, complete and a good faith effort at full disclosure (CEQA Guidelines Section 15151). The DEIR for the proposed project provides an adequate, complete and good faith effort at full disclosure of the physical environmental impacts on tribal cultural resources and the conclusions are based upon substantial evidence in light of the whole record.
The commenter states that there is no evidence that this area has been systematically surveyed for archaeological remains and the commenter also states that since such sites are protected under law, it should be necessary to comply with these laws, laws that prohibit sites from being damaged or destroyed.

As described in Section 3.6, “Cultural Resources, including Tribal Cultural Resources,” of the DEIR, an intensive reconnaissance-level pedestrian field survey of the project area was conducted between July 7 and August 23, 2018. Stantec archaeologists conducted the pedestrian field survey of the proposed WTG locations, access roads, the right-of-way for the generation transmission line (gen-tie), and the location of the Bridgeville Substation. Stantec archaeologists surveyed a 152-meter (500-foot) radius around proposed representative WTG locations and a corridor 152 meters (500 feet) wide around project roads and electrical collection lines (76 meters [250 feet] on either side of the centerline). Stantec archaeologists surveyed an area 152 meters (500 feet) wide around proposed staging and temporary impact areas. Furthermore, Stantec archaeologists surveyed a corridor 60 meters (200 feet) wide around the electrical collection line and the gen-tie (30 meters [100 feet] on either side of the centerline).

The pedestrian field survey of the project area resulted in recordation of 21 newly discovered archaeological sites (16 prehistoric resources, four historic-age resources, and one multi-component resource) and two built environment resources. In addition, Stantec cultural resources staff identified and recorded 20 isolated artifacts and features, and also revisited and updated the six previously recorded resources. Survey findings were summarized on pages 3.6-17 to 3.6-22 in Section 3.6, “Cultural Resources, including Tribal Cultural Resources,” of the DEIR.

Since circulation of the DEIR, additional cultural resources studies have been conducted by Stantec archeologist, for areas of the refined project footprint that were previously unsurveyed. Results of these studies have been documented in the updated California Register of Historical Resources Evaluation of Resource P-12-000212, Humboldt County, California prepared by Browning Cultural Resources, Inc. dated October 2019 in Appendix B of this FEIR. Stantec and Browning Cultural Resources have also examined the expansion of the PG&E substation at Bridgeville to accommodate the project and have determined that the expansion activities can avoid any cultural or historic resources (Bridgeville Substation Expansion for the Humboldt Wind Energy Project CRHR Evaluation of Resource P-12-000212) on file with the County.

The project applicant will be required to comply with all applicable State and local laws, regulations, and policies identified in Section 3.6.2, “Regulatory Setting,” of the DEIR for the identification and treatment of cultural resources, including tribal cultural resources and the County will take information provided by the tribes during AB52 consultation into account when considering project approval.

Impact 3.6-1 (Change to the Significance of an Archaeological Resource) discusses the potential of the project to damage or destroy documented or assumed eligible cultural resources in the project area or previously undiscovered cultural resources. Mitigation Measures 3.6-1a (Avoid Potential Impacts), 3.6-1b (Preserve Resources in Place), 3.6-1c (Monitor Ground-Disturbing Activities), and 3.6-1d (Prepare Treatment Plan and Stop Potentially Damaging Work for Inadvertent Discovery of Cultural Materials Uncovered during Project Construction, Assess the Significance of the Find, and Pursue Appropriate
Management) would reduce the impact of damage to or destruction of archaeological resources during project construction to less than significant.

Impact 3.6-2 (Disturbance of Human Remains) discusses the potential for damage or destruction of previously undiscovered buried human remains during project construction. Mitigation Measure 3.6-2 (Stop Potentially Damaging Work if Human Remains Are Uncovered during Project Construction, Assess the Significance of the Find, and Pursue Appropriate Management), which requires the treatment of discovered human remains be consistent Sections 7050.5 and 7052 of the California Health and Safety Code, and PRC Section 5097, would reduce the impact related to potential for inadvertent damage of human remains discovered during subsurface activities to less than significant.

Please also see Section 3.6 in Chapter 9 of this FEIR for minor updates to the analysis of impact on cultural resources since circulation of the DEIR. These updates are the results of further studies conducted, as indicated above but do not change any of the impact conclusion reached in the DEIR.
The commenter expresses the opinion that the key observation points are inadequate. The commenter states there are no adequate visual representations or animations available in the DEIR for the blinking FAA lights on the wind turbines. The commenter further states that the light pollution impacts of this project will be unavoidable.

The description of aesthetic resources presented in Section 3.2, “Aesthetics,” of the DEIR is thorough and adequate and meets CEQA requirements for describing the existing aesthetic and visual conditions in the project area. Key observation points shown in Figure 3.2-1 were selected to illustrate the range of visual settings and visual sensitivity and represent the most likely locations from which the project site would be viewed. Figures 3.2-2 through 3.2-10 provide representative photographs showing views of the project site.

There is no requirement in the CEQA statutes or guidelines that an EIR include a certain number of types of photographs or photo simulations showing existing views or proposed project facilities. However, Figures 3.2-2 through 3.2-10 in Section 3.2 of the DEIR provide simulated views of the project from each key observation point and compare those to existing views. Figures 3.2-11 through 3.2-19 show enlarged versions of the visual simulations. Table 3.2-3 shows an estimate of the number of air traffic safety lights that could be visible from each key observation point, based on hubs visible in simulations. As discussed in Impact 3.2-3 of the DEIR, feasible mitigation to reduce impact associated with light and glare does not currently exist and therefore cannot be proposed. Please also see the responses to Comments R3-8, R3-9, R3-10, and R3-18, which address views of the project site and light pollution. No revisions to the analysis presented in the DEIR are necessary.

Section 2.4.2, “Public Access and Safety,” of the DEIR addresses Federal Aviation Administration (FAA) requirements for lighting on the proposed turbines. Through its Notice of Proposed Construction or Alteration (Form 7460.1), the FAA would conduct a review of the proposed project before construction begins (Title 14, Part 77 of the Code of Federal Regulations). The turbines proposed under all generation options would be more than 200 feet tall and therefore would require appropriate obstruction lighting. However, the FAA may determine that the absence of marking and/or lighting would not threaten aviation. As a result of its review process, the FAA might recommend installing tower markings or aviation safety lighting on all or only a portion of the turbine towers.

Since the publication of the DEIR, the applicant has proposed a reduction in the number of wind turbine generators from 60 to 47, spread across Monument Ridge and Bear River Ridge. Please see “Refinements to the Project Description” in Chapter 1 of this FEIR for specific refinements to the project description since circulation of the DEIR.

The commenter believes that the project is being fast tracked and that the process is being rushed.

Multiple opportunities for public comment have been provided over the course of this environmental review process and more will be offered when the project is considered by the Planning Commission at a
public hearing. Please see the response to Comment I25-1 for a summary of how the County and the applicant have provided opportunities for public comment.

I149-3 *The commenter expresses concern regarding the plan to leave the turbine bases in place and questions the DEIR’s description of what will happen to the turbine blades after the facilities are decommissioned.*

Project decommissioning is discussed in Section 2.5, “Project Decommissioning and Restoration,” in Chapter 2, “Project Description,” of the DEIR. As stated in Section 2.5, decommissioning would require a separate discretionary permit from the County and would require removal of the WTGs, cables, and other infrastructure support facilities. Upon decommissioning of the facility, the WTGs would be removed from the project site, and the materials would be reused or sold for scrap. Any underground utility improvements would be abandoned in place. Restoration of disturbed lands would occur in accordance with regulations and/or the landowner’s contractual commitments.

I149-4 *The commenter expresses concerns regarding effects on the community and on an emotional, mental, and financial level. The commenter expresses the opinion that the proposed project would result in visual blight that would affect property values and reduce tourism.*

The purpose of this DEIR is to identify the significant effects of the proposed project on the physical environment and this DEIR is not intended to address social or economic impacts. “An economic or social change by itself shall not be considered a significant effect on the environment” (CEQA Guidelines Sections 15131 and 15382).

Please also see the response to Comment 149-1, which addresses the visual impacts of the proposed project.

I149-5 *The commenter expresses concern regarding adverse visual impacts from turbine blades, light pollution, and FAA lighting. The commenter recommends additional KOPs to be incorporated if a redrafting of the DEIR is prepared. The commenter expresses the opinion that members of the city and town governing bodies should be present for consultation when these photos are taken. The commenter supports the No Project Alternative.*

Please see the response to Comment 149-1, which addresses the visual impacts of the proposed project.
The commenter expresses support for the proposed project, noting that the Redwood Coast Energy Authority (RCEA) adopted a resolution calling for 100% renewable energy by 2025 and states the belief that the proposed project, along with other projects selected by RCEA, when fully online, would provide about 2/3 RCEA’s ‘electricity, helping achieve the SB 350 requirement, at a lower cost than RCEA currently pays.

The support for the project is noted. This comment does not raise specific questions or request information that pertains to the adequacy of the DEIR for addressing adverse physical impacts associated with the project, nor does it contain an argument raising significant environmental issues. This comment is published in this Response to Comments document for public disclosure and for decision maker consideration. No further response is required.
I151-1 The commenter expresses opposition to the proposed project and concerns related to habitat for spotted owl and marbled murrelet, erosion, water quality, water supply, noise and vibration, aesthetics, and fire risks.

Section 3.5, “Biological Resources,” in the DEIR has committed the County to the required mitigation measures, has presented clear performance standards that have been further refined in this FEIR, and has described the means of mitigating impacts that would achieve the performance standards. Please also refer to Master Responses 2, “Marbled Murrelet,” and 3, “Northern Spotted Owl,” for a thorough discussion of the impact analysis and proposed mitigation for project impacts on these species and refinements to the impact analysis for these species since circulation of the DEIR.

Water use required during construction and operation of the proposed project is discussed in Section 3.1.3, “Utilities,” of Chapter 3, “Environmental Setting, Impacts, and Mitigation Measures,” of the DEIR. Section 3.10, “Hydrology and Water Quality,” of the DEIR analyzes the potential for erosion and sedimentation into the Eel. Section 3.13, “Fire Protection Services and Wildfire Hazards,” of the DEIR provides information related wildfire and Master Response 10, “Wildfire” in this FEIR provides further discussion of regulatory requirements and mitigation measures that reduce the potential for wildfires. Please see the response to Comment I87-2 regarding impacts from roads and the responses to Comments I121-1 and I123-1, which address noise and vibration. Please also see the responses to Comments R3-8, R3-9, R3-10, R3-18, and I12-1, which address views of the project site.

In addition, the project applicant has refined the footprint of the proposed project to avoid or minimize impacts on sensitive resources since circulation of the DEIR. Please see Master Response 1, “Site Planning and Avoidance Measures,” and “Refinements to the Project Description Since Circulation of the DEIR” in Chapter 1 of this FEIR for the specific refinements that have been made to the project description since circulation of the DEIR.
The commenter provides essentially a copy of Form Letter A, adding that the proposed project should not be placed in a forested area because of the risk of conflicts with birds and particularly the marbled murrelet.

As described in Section 3.5, “Biological Resources,” the DEIR has committed the County to the required mitigation measures and has presented clear performance standards and adaptive management approaches that have been further refined in this FEIR, and has described the means of mitigating impacts that would achieve the performance standards. Please also see Master Responses 2 through 8 for additional detail related to the analysis of impacts on biological resources, a discussion of additional surveys conducted since circulation of the DEIR, and additional refinements to the mitigation measures in the DEIR. Please see Master Response 1, “Site Planning and Avoidance Measures” and “Refinements to the Project Description since circulation of the DEIR” in Chapter 1 of this FEIR for specific refinements to the project description.

The DEIR includes numerous mitigation measures designed to minimize, reduce, or avoid each identified potentially significant impact whenever it is feasible to do so where potentially significant impacts are identified (CEQA Section 21002.1(b) and CEQA Guidelines Section 15126.4). An EIR should focus on mitigation measures that are feasible, practical and effective (Napa Citizens for Honest Govt. v. Napa County Bd. of Supervisors (2001) 91 Cal.App.4th 342, 365).

When a lead agency approves a project that would result in significant and unavoidable impacts (i.e., cannot be reduced to a less-than-significant level) that are disclosed in the EIR, CEQA requires the decision-making body to balance the economic, legal, social, technological, or other benefits of the proposed project against its unavoidable environmental risks and state in writing its reasons for supporting the action (CEQA Guidelines Sections 15093). This statement of overriding considerations must be supported by substantial information in the record. The County may approve the project even though the project would cause a significant effect on the environment if the County makes a fully informed and publicly disclosed decision that shows there is no feasible way to lessen or avoid the significant effect and identifies how the expected benefits from the project outweigh the significant and unavoidable environmental impacts of the project (CEQA Guidelines Section 15043).

Please also see Master Response 2, “Marbled Murrelet,” which provides updated marbled murrelet survey results and additional information on the proposed mitigation measures for marbled murrelets.
The commenter expresses the opinion that the DEIR is inadequate and that more study is needed before approval of the project. The commenter states that the greenhouse gas section of the DEIR is an example of the DEIR’s inadequacy. The commenter provides numerous concerns regarding the greenhouse gas analysis. The commenter states that there are other examples as to why the DEIR is inadequate in assessing the potential environmental impacts.

The County believes that an adequate evaluation of impacts on all resources has been completed. The DEIR addresses the full suite of environmental impacts resulting from implementation of the proposed project. Please see Sections 3.2, “Aesthetics”; 3.3, “Agricultural and Forestry Resources”; 3.4, “Air Quality”; 3.5, “Biological Resources”; 3.7, “Geology and Soils”; 3.8, “Greenhouse Gas Emissions”; 3.9, “Hazards and Hazardous Materials”; 3.10, “Hydrology and Water Quality”; 3.11, “Noise”; and 3.12, “Transportation and Traffic” in the DEIR for an analysis of the project’s impact on these resources, and for specific mitigation measures related to impacts on these resources. Please also see Master Response 9, “Adequacy of the Greenhouse Gas Analysis,” for additional in-depth information regarding the adequacy of the greenhouse gas analysis and results of additional modelling completed to substantiate the findings presented in the DEIR.

Please see Master Response 1, “Site Planning and Avoidance Measures,” for further information on the history and siting of the proposed project.

The commenter provides an opinion that there are other examples as to why the DEIR is inadequate, but does not provide any additional examples. No further revisions to the DEIR are necessary.
The commenter expresses opposition to the proposed project. The commenter states that the project is likely to result in death of numerous special-status species, such as the marbled murrelet, and may cause population-level impacts to once-numerous species, such as the hoary bat. The commenter expresses the opinion that the DEIR fails to detail adequate mitigation measures to avoid, minimize, and compensate for these significant environmental and tribal cultural impact.

As described in Section 3.5, “Biological Resources,” the DEIR has committed the County to the required mitigation measures, has presented clear performance standards that have been further refined in this FEIR, and has described the means of mitigating impacts that would achieve the performance standards. Please also see Master Responses 2 through 8 for additional detail related to the analysis of impacts on biological resources, a discussion of additional surveys conducted since circulation of the DEIR, and additional refinements to the mitigation measures in the DEIR.

In addition, the project applicant has refined the footprint of the proposed project to avoid or minimize impacts on sensitive resources since circulation of the DEIR. Please see Master Response 1, “Site Planning and Avoidance Measures” and “Refinements to the Project Description since Circulation of the DEIR” in Chapter 1 of this FEIR for the specific refinements that have been made to the project description.

Please see the responses to Comment 148-1 and 148-2 regarding tribal cultural resources.

The DEIR includes numerous mitigation measures designed to minimize, reduce, or avoid each identified potentially significant impact whenever it is feasible to do so where potentially significant impacts are identified (CEQA Section 21002.1(b) and CEQA Guidelines Section 15126.4). An EIR should focus on mitigation measures that are feasible, practical and effective (Napa Citizens for Honest Govt. v. Napa County Bd. of Supervisors (2001) 91 Cal.App.4th 342, 360).

When a lead agency approves a project that would result in significant and unavoidable impacts (i.e., cannot be reduced to a less-than-significant level) that are disclosed in the EIR, CEQA requires the decision-making body to balance, the economic, legal, social, technological, or other benefits of the proposed project against its unavoidable environmental risks and state in writing its reasons for supporting the action (CEQA Guidelines Sections 15093). This statement of overriding considerations must be supported by substantial information in the record. The County may approve the project even though the project would cause a significant effect on the environment if the County makes a fully informed and publicly disclosed decision that shows there is no feasible way to lessen or avoid the significant effect and identifies how the expected benefits from the project outweigh the significant and unavoidable environmental impacts of the project (CEQA Guidelines Section 15043).
The commenter expresses opposition to the proposed project. The commenter expresses the opinion that the impact assessments are based on faulty research, models, and calculations and that mitigations have poor track records, with low success rates, and poor enforcement. The commenter states that the cumulative impacts are not well analyzed. The commenter further states that the carbon savings of the proposed project is minimal. The commenter asks if there are other better alternatives, such as rooftop solar.

The commenter provides an opinion that mitigation has low success rates and poor enforcement but neither explains which specific mitigation measures in the DEIR would support this opinion nor cites examples from other projects where mitigation may have had poor success. The DEIR includes numerous mitigation measures designed to minimize, reduce, or avoid each identified potentially significant impact whenever it is feasible to do so where potentially significant impacts are identified (CEQA Section 21002.1(b) and CEQA Guidelines Section 15126.4).

Where several measures are available to mitigate an impact, each should be discussed and the basis for selecting a particular measure should be identified. Mitigation measures may specify performance standards which would mitigate the significant effect of the project and which may be accomplished in more than one specified way. The specific details of a mitigation measure, however, may be developed after project approval when it is impractical or infeasible to include those details during the project’s environmental review provided that the agency (1) commits itself to the mitigation, (2) adopts specific performance standards the mitigation will achieve, and (3) identifies the type(s) of potential action(s) that can feasibly achieve that performance standard and that will considered, analyzed, and potentially incorporated in the mitigation measure. Compliance with a regulatory permit or other similar process may be identified as mitigation if compliance would result in implementation of measures that would be reasonably expected, based on substantial evidence in the record, to reduce the significant impact to the specified performance standards (Guidelines Section 15126.4).

As stated in Chapter 4, “Cumulative Impacts,” the cumulative impact analysis is based on the State CEQA Guidelines (in Section 15130[b]) that provide the following guidance for conducting an adequate cumulative impact analysis: The discussion of cumulative impacts shall reflect the severity of the impacts and their likelihood of occurrence, but the discussion need not provide as great detail as is provided for the effects attributable to the project alone. The discussion should be guided by the standards of practicality and reasonableness and should focus on the cumulative impact to which the identified other projects contribute rather than the attributes of other projects which do not contribute to the cumulative impact.

The DEIR’s alternatives analysis meets the CEQA requirements as described in Chapter 6, “Alternatives,” of the DEIR. The County has considered a range of alternatives that could feasibly attain most of the basic project objectives identified in Section 2.2.2, “Project Objectives,” of Chapter 2, “Project Description,” and avoid or substantially lessen one or more significant effects. Please also see Master Response 11, “Alternatives,” for further discussion.
Please see Master Response 9, “Adequacy of the Greenhouse Gas Analysis,” for additional in-depth information regarding the adequacy of the greenhouse gas analysis.

It should be noted that CEQA does not require a lead agency to conduct every test or perform all research, study, and experimentation recommended or demanded by commenters. In reviewing draft EIRs, persons and public agencies should focus on the sufficiency of the document in identifying and analyzing the possible impacts on the environment and ways in which the significant effects of the project might be avoided or mitigated (CEQA Guidelines Section 15204).

An EIR is not inadequate simply because experts in a particular environmental subject matter dispute the conclusions reached by the experts whose studies were used in drafting the EIR, even where different conclusions can reasonably be drawn from a single pool of information. (CEQA Guidelines Section 15151; Guide to the California Environmental Quality Act [CEQA] [Remy et al. 2007:499–500]; Greenebaum v. City of Los Angeles [1984] 153 Cal. App. 3d 391, 413.) Perfection is not required, but the EIR must be adequate, complete and a good faith effort at full disclosure (CEQA Guidelines Section 15151).

The DEIR for the proposed project provides an adequate, complete and good faith effort at full disclosure of the physical environmental impacts on tribal cultural resources and the conclusions are based upon substantial evidence in light of the whole record. Supplemental information regarding tribal cultural resources in this FEIR provides additional information based on site specific studies conducted since circulation of the DEIR but does not change any of the conclusions reached in the DEIR. No further revisions are necessary.
The commenter asks why a broader scoped approach to off-loading sites is not taken and why existing commercial harbors in and around Eureka are not proposed. The County provided an answer to the question. The commenter asks a follow-up question stating asking why improvements to Highway 101 in this area could not be repaired in this area.

This comment does not raise specific questions or request information that pertains to the adequacy of the DEIR for addressing adverse physical impacts associated with the project, nor does it contain an argument raising significant environmental issues. This comment is published in this Response to Comments document for public disclosure and for decision maker consideration.

Please also see the response to Comment I143-1 for further discussion of why Fields Landing was chosen as the component landing site. Any damage sustained to Highway 101 as a result of the project would be repaired in compliance with the mitigation presented in the DEIR. No further revisions are necessary.
1157-1  The commenter requests that Highway 101 be upgraded or re-routed so that turbines and other equipment may be off loaded in Eureka Harbor.

This comment does not raise specific questions or request information that pertains to the adequacy of the DEIR for addressing adverse physical impacts associated with the project, nor does it contain an argument raising significant environmental issues. This comment is published in this Response to Comments document for public disclosure and for decision maker consideration. No further response is required.
The commenter expresses opposition to the proposed project and states the DEIR leaves unanswered questions. The commenter states that the project would damage raptors and other wildlife and affect county roads and other infrastructure and these impacts are not fully known.

The County believes that an adequate evaluation of resources has been completed. The DEIR addresses the full suite of environmental impacts resulting from implementation of the proposed project. Please see Sections 3.2, “Aesthetics”; 3.3, “Agricultural and Forestry Resources”; 3.4, “Air Quality”; 3.5, “Biological Resources”; 3.7, “Geology and Soils”; 3.8, “Greenhouse Gas Emissions”; 3.9, “Hazards and Hazardous Materials”; 3.10, “Hydrology and Water Quality”; 3.11, “Noise”; and 3.12, “Transportation and Traffic” in the DEIR for an analysis of the project’s impact on these resources, and for specific mitigation measures related to impacts on these resources.

The commenter states that the DEIR leaves unanswered questions, but provides no specific questions. No further revisions are necessary.
The commenter states the opinion that wind generated power has not been shown to reduce the use of other fuels and believes that 1.5 years of survey samples do not provide enough information to complete scientific evaluation of environmental impacts. The commenter believes that the EIR doesn’t address vibration effects from the turbines, clear cutting, including old growth redwoods, or effects on fully protected species. The commenter mentions other concerns such as wildfire, radar interference and decreases in property values and believes that the project applicant is rushing through the process without complete and sound science.

As described in Section 3.5, “Biological Resources,” the DEIR has committed the County to the required mitigation measures, has presented clear performance standards that have been further refined in this FEIR, and has described the means of mitigating impacts that would achieve the performance standards. Please also see Master Responses 2 through 8 for additional detail related to the analysis of impacts on biological resources, a discussion of additional surveys conducted since circulation of the DEIR, and additional refinements to the mitigation measures in the DEIR.

Section 3.13, “Fire Protection Services and Wildfire Hazards,” of the DEIR provides information related wildfire and Master Response 10, “Wildfire” of this FEIR provides further discussion of regulatory requirements and mitigation measures that reduce the potential for wildfires. The Response to Comment letter I21 addresses electricity distribution. Please see the response to Comment I87-2 regarding impacts from roads. Please see the responses to Comments I121-1 and I123-1, which address noise and vibration.

Please see Master Response 1, “Site Planning and Avoidance Measures” for further information on the history and siting of the proposed project. Please also see the response to Comment I25-1 for a summary of how the County and the applicant have provided opportunities for public comment.

In addition, the project applicant has refined the footprint of the proposed project to avoid or minimize impacts on sensitive resources since circulation of the DEIR. Please see “Refrainements to the Project Description since Circulation of the DEIR” in Chapter 1 of this FEIR for specific refinements to the project description.

The commenter states the DEIR is deliberating confusing. The DEIR follows a standard format and outline for impact analysis conducted pursuant to CEQA. A project of this nature is inherently complex and the analysis in the DEIR is supported by many technical studies presented in technical Appendices. However, the County has made every effort to present a clear and thorough analysis of all project related impacts. No further revisions are necessary.

The commenter states that wind turbines can have a significant impact on operational capabilities of military air defense radar systems but does not provide any information to substantiate that claim nor does this comment raise specific questions or request information that pertains to the adequacy of the DEIR for addressing adverse physical impacts associated with the project. No revisions to the DEIR are necessary.
The commenter states the project would affect property values. The purpose of the DEIR is to identify the significant effects of the proposed project on the physical environment and the DEIR is not intended to address social or economic impacts. “An economic or social change by itself shall not be considered a significant effect on the environment” (CEQA Guidelines Sections 15131 and 15382). No revisions are necessary.
I160-1  *The commenter cites a Google search that provides an estimate of the oxygen produced by 895 acres of trees and a recent study that found that determined that grasslands may be as important as forests as carbon sinks.*

CEQA does not require a lead agency to conduct every test or perform all research, study, and experimentation. In reviewing draft EIRs, persons and public agencies should focus on the sufficiency of the document in identifying and analyzing the possible impacts on the environment and ways in which the significant effects of the project might be avoided or mitigated (CEQA Guidelines Section 15204).

Please also see Master Response 9, “Adequacy of the Greenhouse Gas Analysis,” for additional in-depth information regarding the adequacy of the greenhouse gas analysis and results of additional modelling completed to substantiate the findings presented in the DEIR.

I160-2  *The commenter expresses concern regarding the use of Monument Road by large trucks.*

Section 3.12, “Transportation and Traffic,” of the DEIR addresses traffic and emergency access. The designation of Monument Road would not change as a result of the project. The project applicant is required to prepare a traffic management plan that will address safe ingress and egress to the project site, including during construction.

I160-3  *The commenter expresses the opinion that the project would result in negative impacts and believes that the project applicant fast tracked the DEIR studies.*

Please see Master Response 1, “Site Planning and Avoidance Measures” for further information on the history and siting of the proposed project. Please also see the response to Comment I25-1 for a summary of how the County and the applicant have provided opportunities for public comment.

I160-4  *The commenter expresses concern regarding adverse impacts of the project on California condors, particularly future animals that the commenter believes will not be wearing transponders.*

Please see response to comment letter T1 for specific responses to comments submitted by the Yurok Tribe and Response to Comment I65-1, both of which address California condors. Please also see the response to Comment I65-1 regarding California condors.

I160-5  *The commenter states that the DEIR does not mention the California floater nor does it mention mitigation measures related to it or other mollusks native to the Eel River and Jordan Creek.*

Section 3.5, “Biological Resources,” of the DEIR contains a thorough analysis of all special-status species with the potential to occur in the project area. Section 3.10, “Hydrology and Water Quality,” of the DEIR contains a thorough analysis of potential water quality impacts caused by the project, and mitigation measures to reduce these impacts to less than significant. The commenter does not present specific information why they believe that mollusks in the Eel River or Jordan Creek could be affected by the proposed project. No revisions are necessary.
1160-6 The commenter notes that the town of Scotia is recognized as a historic district and subject to strict guidelines intended to maintain its historic integrity. The commenter expresses the opinion that the project would result in declines in tourism, property values and immigration to the town.

Please refer to the response to comment letter R3 for specific responses submitted by the Town of Scotia.

1160-7 The commenter lists 42 potential sources of CO2 or other GHG that they indicate are not addressed in the EIR. The commenter indicates that the EIR doesn’t calculate the amount of CO2 removed from the atmosphere by trees and grasslands.

Please see Master Response 9, “Adequacy of the Greenhouse Gas Analysis,” for additional in-depth information regarding the adequacy of the greenhouse gas analysis. The DEIR followed standard methodology in conducting the greenhouse gas analysis.

1160-8 The commenter states the opinion that clear cutting of trees in a Timber Production Zone is prohibited and believes that the DEIR does not support compliance with California Code Section 51100 -51104.

Please see Section 3.3, “Agricultural and Forestry Resources,” in the DEIR. Construction and operation of electrical distribution and transmission lines are permitted uses in a Timber Production Zone. Construction and operation of wind generation facilities are conditionally permitted in a Timber Production Zone.

1160-9 The commenter characterizes the use of water from the Scotia log pond as illegal and indicates that the EIR doesn’t stipulate a secondary water source. The commenter states that the EIR’s water analysis is incorrect.

Water use required during construction and operation of the proposed project is discussed in Section 3.1.3, “Utilities,” of Chapter 3, “Environmental Setting, Impacts, and Mitigation Measures,” of the DEIR. Please also see the response to Letter S4, which addresses comments provided by the Scotia Community Services District. The commenter does not present specific arguments why they believe the water analysis in the EIR is incorrect. No further revisions are required.

1160-10 The commenter states that the area around Fields Landing are considered part of the state’s coastal zone and thus subject to laws and regulations of the California Coastal Commission; the commenter indicates that they did not find any permit. The commenter also expresses the opinion that the DEIR provides no discussion of construction or transportation effects on residents of Fields Landing.

Please refer to the response to comment letter S5 for specific responses submitted by the California Coastal Commission. The DEIR discusses project-related uses in the coastal zone and identifies the need for a coastal development permit. This permit will be obtained prior to project activity in the coastal zone requiring such a permit.

Section 3.12, “Transportation and Traffic,” in the DEIR analyzes the proposed project impacts on traffic, including specific impacts to local roadways and Highway 101 during construction. A construction traffic management plan must be prepared as a condition of the project. That plan would identify haul routes, construction worker traffic patterns, and detour routes for implementation during transportation of heavy project components.
Section 3.11, “Noise,” in the DEIR analyzed increases in Depot Road traffic and off-loading noise in Fields Landing attributable to the proposed project. This is a commercial area, which has a lower noise threshold that residential areas, but the impact was conservatively analyzed for the lower residential threshold and mitigation was provided for those impacts. The mitigation provided for the lower threshold residential thresholds will also serve to mitigate noise in this commercial area.

I160-11 The commenter believes the project would violate HRC’s Habitat Conservation Plan due to planned construction in wet weather.

Please see Master Response 8, “Conflict with Adopted HCP,” which provides an overview of the project’s relationship to the HRC HCP.

I160-12 The commenter states the opinion that lighting required by FAA would be unattractive and would be visible from key observation points and thus the project is inconsistent with the County’s General Plan.

Please see the response to Comment I149-1, which addresses FAA lighting requirements.

I160-13 The commenter provides examples of tree planting plans in other places and supports the No Project Alternative.

This comment does not raise specific questions or request information that pertains to the adequacy of the DEIR for addressing adverse physical impacts associated with the project, nor does it contain an argument raising significant environmental issues. This comment is published in this Response to Comments document for public disclosure and for decision maker consideration. No further response is required.
I161-1 The commenter expresses the opinion that the proposed project, would cause long-term impacts to cultural and environmental resources and opposes the project because it would destroy tribal resources, harm threatened species, and offer few direct benefits to the community.

Please refer to the response to Comment I48, which addresses cultural and tribal cultural resources, and the response to comment letter T2 for specific responses to comments submitted by the Wiyot Tribe. Please also refer to Section 3.5, “Biological Resources,” of the DEIR and Master Responses 2 through 6 in the DEIR for an analysis of the project’s impact on special-status species.

I161-2 The commenter believes that the project would result in the death of numerous special-status species.

As described in Section 3.5, “Biological Resources,” the DEIR has committed the County to the required mitigation measures, presented clear performance standards that have been further refined in this FEIR, and described the means of mitigating impacts that would achieve the performance standards. Please also see Master Responses 2 through 8 for additional detail related to the analysis of impacts on biological resources, a discussion of additional surveys conducted since circulation of the DEIR, and additional refinements to the mitigation measures in the DEIR. Please also see the response to Comment I65-1 regarding California condors and Response to Comment 154-1 regarding mitigation measures.

I161-3 The commenter expresses the belief that the project applicant “will not sign a community benefits agreement,” that the applicant is “offering the affected community very little for this wind project,” and that the applicant “will not entertain any proposals for hiring union workers, training local workers, or guaranteeing a living wage for project workers.”

Please see the response to Comment I21-1 regarding energy generation and distribution. This comment expresses an opinion and is not directed at the adequacy of the DEIR, nor does it contain an argument raising significant environmental issues. No further response is required.
1162-1 The commenter is opposed to the project and expresses opinions regarding the trees to be cleared and other carbon sinks that would be affected and effects on condors. The commenter also states the belief that the turbines use fossil fuel and represent much loss and no real gain for the community.

The commenter expresses opposition to the proposed project. This comment does not raise specific questions or request information that pertains to the adequacy of the DEIR for addressing adverse physical impacts associated with the project, nor does it contain an argument raising significant environmental issues. This comment is published in this Response to Comments document for public disclosure and for decision maker consideration.

Please also see the response to Comment I65-1 regarding California condors. Please also see Master Response 9, “Adequacy of the Greenhouse Gas Analysis,” for additional in-depth information regarding the adequacy of the greenhouse gas analysis and results of additional modelling completed to substantiate the findings presented in the DEIR.
I163-1  The commenter believes the DEIR fails to adequately address impacts to birds and wildlife and recommends that the DEIR specify mitigation measures rather than planning to plan mitigation. The commenter states that the Audubon Society recommends “operational minimization measures” and recommend that these be included in the DEIR. The commenter further notes that the American Bird Conservancy suggest that use of offset resources, which are relied upon in the DEIR, are ineffective and unreliable.

Please see the responses to Comments I154-1 and I155-1 regarding mitigation measures and performance standards. Please see response to comment Letter O1 for specific responses to comments submitted by the American Bird Conservancy and O16 for specific responses to comments submitted by the Redwood Region Audubon.

In addition, the project applicant has refined the footprint of the proposed project to avoid or minimize impacts on sensitive resources since circulation of the DEIR. Since the publication of the DEIR, the applicant has proposed a reduction in the number of wind turbine generators from 60 to 47, spread across Monument Ridge and Bear River Ridge. Please see Master Response 1, “Site Planning and Avoidance Measures” and “Refinements to the Project Description Since Circulation of the DEIR” in Chapter 1 of this FEIR for the specific refinements that have been made to the project description.

Please also refer to Section 3.5, “Biological Resources,” of the DEIR and Master Responses 2 through 6 in the DEIR for an analysis of the project’s impact on special-status species.
1I64-1 The commenter believes that the proposed project would change the project area which contains a large concentration of birds and bats and that one year of bird surveys is too small a dataset for the project. The commenter expresses the opinion that the project would have a substantial effect on Marbled Murrelet and that this impact should be explored further using a larger database.

Please see Master Response 2, “Marbled Murrelet,” which describes the results of the Humboldt Wind Energy Project Marbled Murrelet Radar Survey Report – Year 2. The full report is included in Appendix B of this FEIR. Please also see Master Response 1, “Site Planning and Avoidance Measures,” for a summary of project siting, planning, and design criteria, including siting criteria considered to avoid and minimize impacts on marbled murrelets. In addition, please also see Master Responses 3 through 8 for additional detail related to the analysis of impacts on biological resources, a discussion on additional surveys conducted since circulation of the DEIR, and additional refinements to the mitigation measures in the DEIR.

1I64-2 The commenter suggests additional bat surveys and expresses the opinion that migratory bats and breeding would be greatly affected by the project and recommends three articles on the subject of bats.

Please see the response to Comment I64-2 regarding bats. Please also see Master Response 4 “Bats,” for information on additional analysis of potential impacts to bats and for refinements of Mitigation Measure 3.5-18a through 3.5-18d made since circulation of the DEIR.

The commenter cites studies regarding bats. CEQA does not require a lead agency to conduct every test or perform all research, study, and experimentation recommended or demanded by commenters. An EIR is not inadequate simply because experts in a particular environmental subject matter dispute the conclusions reached by the experts whose studies were used in drafting the EIR, even where different conclusions can reasonably be drawn from a single pool of information. (CEQA Guidelines Section 15151; Guide to the California Environmental Quality Act [CEQA] [Remy et al. 2007:499–500]; Greenebaum v. City of Los Angeles [1984] 153 Cal. App. 3d 391, 413.) Perfection is not required, but the EIR must be adequate, complete and a good faith effort at full disclosure (CEQA Guidelines Section 15151).

1I64-3 The commenter recommends additional eagle surveys on which to base proper mitigation measures. In addition, the commenter believes that the fire risk in the forest could also adversely impact birds and bats.

Please see the response to Comment I3 regarding eagles. In addition please also see Master Response 6, “Eagles and Other Raptors,” for further discussion on additional surveys conducted since circulation of the DEIR and for additional refinements to the mitigation measures in the DEIR.

Section 3.13, “Fire Protection Services and Wildfire Hazards,” of the DEIR provides information related wildfire and Master Response 10, “Wildfire” of this FEIR provides further discussion of regulatory requirements and mitigation measures that reduce the potential for wildfires.
1164-4  *The commenter states wildfire is a concern and asks who will be responsible for paying for clean up if a disaster occurs.*

Section 3.13, “Fire Protection Services and Wildfire Hazards,” of the DEIR provides information related wildfire and Master Response 10, “Wildfire” of this FEIR provides further discussion of regulatory requirements and mitigation measures that reduce the potential for wildfires.

The commenter asks a question regarding payment for clean up if a fire occurs. The purpose of the DEIR is to identify the significant effects of the proposed project on the physical environment and this DEIR is not intended to address social or economic impacts. “An economic or social change by itself shall not be considered a significant effect on the environment” (CEQA Guidelines Sections 15131 and 15382).

1164-5  *The commenter suggests rethinking or relocating the project.*

This comment does not raise specific questions or request information that pertains to the adequacy of the DEIR for addressing adverse physical impacts associated with the project, nor does it contain an argument raising significant environmental issues. This comment is published in this Response to Comments document for public disclosure and for decision maker consideration. No further response is required.
I165-1  The commenter provides a clarification to their previous letter, identified as I164 in the FEIR

Please see response to comment letter I164. No further revisions to the response are necessary.
1166-1 The commenter also states the belief that the project area is very seismically active and states that the No Project alternative should be chosen. The letter also provides numerous links to websites regarding wind turbine generators.

Please see the response to Comment I171-6 regarding seismicity.

CEQA does not require a lead agency to conduct every test or perform all research, study, and experimentation recommended or demanded by commenters. In reviewing draft EIRs, persons and public agencies should focus on the sufficiency of the document in identifying and analyzing the possible impacts on the environment and ways in which the significant effects of the project might be avoided or mitigated (CEQA Guidelines Section 15204).

An EIR is not inadequate simply because experts in a particular environmental subject matter dispute the conclusions reached by the experts whose studies were used in drafting the EIR, even where different conclusions can reasonably be drawn from a single pool of information. (CEQA Guidelines Section 15151; Guide to the California Environmental Quality Act [CEQA] [Remy et al. 2007:499–500]; Greenebaum v. City of Los Angeles [1984] 153 Cal. App. 3d 391, 413.) Perfection is not required, but the EIR must be adequate, complete and a good faith effort at full disclosure (CEQA Guidelines Section 15151). The DEIR for the proposed project provides an adequate, complete, and good faith effort at full disclosure of the physical environmental impacts on tribal cultural resources and the conclusions are based upon substantial evidence in light of the whole record.
The commenter lists a number of concerns regarding the proposed project, but, states as a landscape artist, the comment focuses on aesthetics. The commenter expresses the opinion that the project area’s visual resources would be adversely affected by the proposed project.

This comment does not raise specific questions or request information that pertains to the adequacy of the DEIR for addressing adverse physical impacts associated with the project. This comment is published in this Response to Comments document for public disclosure and for decision maker consideration.

The project’s impact on aesthetic resources, including visual resources are analyzed in Chapter 3.2, “Aesthetics,” of the DEIR. The analysis finds impact on scenic vistas and the visual character of the site significant and unavoidable.

Please also the responses to Comments R3-8, R3-9, R3-10, R3-18, and I12-1, which address views of the project site.
The commenter expresses the opinion that others have developed wind energy projects from which the County could learn. The commenter provides the same list of links to websites about wind turbines as provided in letter I166.

Please see the response to Comment I166-1.
The commenter opposes the proposed project and states the opinion that the project would do irreversible damage to local resources. The commenter believes that the project is being rushed through and that the DEIR is incomplete and there are many issues that have not been resolved, such as the water source for the concrete, the possible effects of the turbine footings on aquifers, and the turbines’ effect on deciduous species. The asks about revenues from the proposed projects and states that that there has been little time to study the environmental impacts of the project.

The County believes that an adequate evaluation of resources has been done. The DEIR addresses the full suite of environmental impacts resulting from implementation of the proposed project. Please see Sections 3.2, “Aesthetics”; 3.3, “Agricultural and Forestry Resources”; 3.4, “Air Quality”; 3.5, “Biological Resources”; 3.7, “Geology and Soils”; 3.8, “Greenhouse Gas Emissions”; 3.9, “Hazards and Hazardous Materials”; 3.10, “Hydrology and Water Quality”; 3.11, “Noise”; and 3.12, “Transportation and Traffic” in the DEIR for an analysis of the project’s impact on these resources, and for specific mitigation measures related to impacts on these resources.

Please see Master Response 1, “Site Planning and Avoidance Measures” for information on the history and siting of the proposed project. In addition, the project applicant has refined the footprint of the proposed project to avoid or minimize impacts on sensitive resources since circulation of the DEIR. Please see “Refinements to the Project Description since Circulation of the DEIR” in Chapter 1 of this FEIR for specific refinements to the project description.

The commenter asks about collection of revenues. The purpose of this DEIR is to identify the significant effects of the proposed project on the physical environment and this DEIR is not intended to address social or economic impacts. “An economic or social change by itself shall not be considered a significant effect on the environment” (CEQA Guidelines Sections 15131 and 15382).
I170-1 The commenter provides a broad overview of perceived deficiencies and questions the assumptions and activities associated with construction and operation of the project as described in the project description. The commenter expresses the opinion that the DEIR preparation was rushed. A critique of the project figure is followed by opinions on project objectives, questions about the power output of the project, and confusion over the study corridor concept. Comments I170-2 to I170-14 provide further comments regarding the project description. The commenter references numerous journal article and studies and provides reference to websites throughout the comment letter. The commenter recommends review of these articles and requests incorporation of relevant material into the DEIR.

Pursuant to CEQA Guidelines, an EIR project description should contain the location and boundaries of the proposed project by way of a map; a description of the project's technical, economic, and environmental characteristics; and a statement briefly describing the intended use of the EIR (CEQA Guidelines Section 15124[a]-[d]). The project description “should not supply extensive detail beyond that needed for evaluation and review of the environmental impact” (CEQA Guidelines Section 15124). A general conceptual discussion of the main features of the project is sufficient (CEQA Guidelines Section 15124[a], [c]; Dry Creek Citizens Coalition v. County of Tulare, 70 Cal. App. 4th 20, 27-28 [1999]). In addition, a project description can have some flexibility regarding the final arrangement of land uses, siting, and massing characteristics, but there cannot be so much flexibility as to confuse the reader.1

Chapter 2, “Project Description,” of the DEIR contains detailed text and exhibits to illustrate the proposed project location, proposed project objectives, a summary of the project’s components, construction and phasing, project operations and maintenance, and project decommissioning. Chapter 2 provides a general conceptual discussion of the main features which is sufficient under CEQA Guidelines Section 15124(a). Chapter 2 comprises 41 pages dedicated to describing the propose project. Enough detail is provided to enable the reader to understand what is proposed and in turn be able to envision the types and intensities of the project’s environmental effects. A description of the proposed wind turbines including a discussion of the mass, height, rotor swept area, and range of power generated2 is found on pages 2-7 through 2-9 of the DEIR. The turbine dimensions (Figure 2-3), a typical turbine pad layout (Figure 2-4), typical cross sections for access roads (Figure 2-6), drainage improvements planned for stream crossings (Figure 2-7), a site plan for the onsite substation and cross section of the collection cable trench (Figure 2-8), an image of a typical O&M building (Figure 2-12), meteorological tower (Figure 2-13), and a site plan for the construction staging area and batch plant (Figure 2-21) are also provided for the reader.

The DEIR includes 22 figures depicting project components and construction areas to assist the reader with understanding the project characteristics. Included is a regional location map (Figure 2-1), setting

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1 Courts have found an EIR project description to be inadequate when an “illustrative scenario” was used for a “potential development program” that would implement land use and development standards, but which provided the developers with “flexibility regarding the final arrangement and density of specific land uses, siting, and massing characteristics”. The Court found that the project description was not stable or finite because the EIR failed “to describe the siting, size, mass, or appearance of any building proposed to be built at the project site.”Stopthemillenniumhollywood.com v. City of Los Angeles.

2 Renewable power generation is described in terms of nameplate capacity which refers to generation under ideal conditions. Output of a wind turbine is generally limited by weather conditions to levels below the maximum power generation
and project boundary covering all related activity (Figure 2-2), component offloading at Fields Landing (Figure 2-14), barge transport to the harbor (Figure 2-15), temporary storage site at Fields Landing (Figure 2-16), and component haul route inclusive of detours that may be required at two locations where the freeway overpass is not tall enough to accommodate the size of project components (Figures 2-17, 2-19 and 2-20).

Table 2-6 on page 2-42 of the DEIR lists relevant regulations, the regulatory agency or regulator for each approval, and the specific permit or authorization required. A detailed discussion of these regulations is found under the Regulatory Setting discussion found in Section 3, “Environmental Setting, Impacts, and Mitigation Measures” of the DEIR. The detailed discussion of environmental setting, impacts and mitigation measures are found in Section 3 of the Draft EIR and some issues are further explored in the Master Responses in this FEIR. Please see responses to comments I170-15 to I170-46 that provides additional responses to the commenter’s concerns, questions, and opinions regarding project components and activities identified in the project description.

The County believes that an adequate evaluation of the project’s impact on all resources has been completed. The DEIR addresses the full suite of environmental impacts resulting from implementation of the proposed project. Please see Sections 3.2, “Aesthetics”; 3.3, “Agricultural and Forestry Resources”; 3.4, “Air Quality”; 3.5, “Biological Resources”; 3.7, “Geology and Soils”; 3.8, “Greenhouse Gas Emissions”; 3.9, “Hazards and Hazardous Materials”; 3.10, “Hydrology and Water Quality”; 3.11, “Noise”; and 3.12, “Transportation and Traffic” in the DEIR for an analysis of the project’s impact on these resources, and for specific mitigation measures related to impacts on these resources. Numerous technical studies were prepared and relied upon during preparation of the DEIR. A list of additional technical studies completed since circulation of the DEIR is included in Chapter 1 of this FEIR and these studies are included in Appendix B of this FEIR, as appropriate.

Please also see Master Response 1, “Site Planning and Avoidance Measures,” for further information on the history and siting of the proposed project. Please also see the response to Comment I25-1 for a summary of how the County and the applicant have provided opportunities for public comment.

CEQA does not require a lead agency to conduct every test or perform all research, study, and experimentation recommended or demanded by commenters. In reviewing draft EIRs, persons and public agencies should focus on the sufficiency of the document in identifying and analyzing the possible impacts on the environment and ways in which the significant effects of the project might be avoided or mitigated (CEQA Guidelines Section 15204). An EIR is not inadequate simply because experts in a particular environmental subject matter dispute the conclusions reached by the experts whose studies were used in drafting the EIR, even where different conclusions can reasonably be drawn from a single pool of information. (CEQA Guidelines Section 15151; Guide to the California Environmental Quality Act [CEQA] [Remy et al. 2007:499–500]; Greenebaum v. City of Los Angeles [1984] 153 Cal. App. 3d 391, 413.) Perfection is not required, but the EIR must be adequate, complete and a good faith effort at full disclosure (CEQA Guidelines Section 15151). The DEIR for the proposed project provides an adequate, complete and good faith effort at full disclosure of the physical environmental impacts and the conclusions are based upon substantial evidence in light of the whole record.

As discussed in Master Response 1, “Project Siting and Design,” in this FEIR, the project applicant has made refinements to the project to avoid and minimize impacts on sensitive resources throughout the
planning and concept design process. Please also refer to Chapter 1 of this FEIR for “Refinements to the Project Description Since Circulation of the DEIR” for details on the most recent refinements. These project description revisions are also shown in FEIR Section 9.2, “Revisions to the DEIR” and include a reduction of the disturbance area from 900 to approximately 655 acres (due to narrowing of the 500 foot corridor); re-alignment and shortening of the gen-tie to avoid northern spotted owl habitat; reduction of the gen-tie length from 25 to 22 miles and co-location with existing roads wherever possible; reduction of the number of turbines from 60 to 47 and micro siting of turbines to avoid known cultural and sensitive biological resources; overhead crossing of the gen-tie line over the Eel River and relocating it 1.8 miles east of the previous route and other slight routing adjustments; a re-aligned access route, and adopting the “realigned Jordan Creek access” presented in Alternative 2 in the DEIR. Please see Figure 1-1 in Chapter 1 of this FEIR for the revised project footprint. With these reduction in the area of ground disturbance the amount of potential sedimentation is also reduced.

Please also note that the schedule for construction has changed from that described in the DEIR. The project applicant had originally planned for a construction period of approximately 18 months starting in fall 2019 during the wet season. The project is now slated to begin construction at the staging area at Jordan Creek and the access road onto Monument Ridge across HRC lands in 2020. The 18-month construction period remains unchanged.

I170-2 The commenter states that the project description does not include enough information to allow readers to understand the impacts of the project. There is no name brand for the turbine and power output is discussed in terms of theoretical capacity. The commenter also questions the use of a study corridor and is unable to determine which among the alternatives to the project would disturb the least amount of land. The commenter continues with questions on the nature of the access roads and suggests revegetation of temporary roads would remain as permanent impacts. The commenter asks whether the expansion of the Bridgeville substation would block traffic temporarily or permanently, and states that the figure in the DEIR and the text on page 2-17 do not adequately address impacts on the existing road, which is in a wooded area at risk for wildfire. The commenter asks whether the operations and maintenance facility will be visible from the highway and the exit from Avenue of the Giants. The commenter states that planned locations of the meteorological towers are not provided.

Please see the response to Comment I170-1, above.

I170-3 The commenter speculates where 3 million cf of excavated earth would be placed implying soil export is required, and whether the analysis considered the lost storage capacity of carbon provided by the trees and vegetation that must be removed to construct the project. The commenter also wonders whether the applicant would prepare a timber harvest plan for the trees harvested, and who would receive the timber.

The commenter states that the DEIR does not mention the delay associated with wet weather during the winter season. The commenter questions the phasing plan and does not believe the project will be operational by December 2020 before the expiration of federal subsidies.

Please see the response to Comment I170-1.

I170-4 The commenter questions the DEIR’s explanations of how components would be shipped and staged in winter. The commenter asks how cranes would reach the project site, stating that a Terra Gen
representative indicated during a Board of Supervisors meeting that the cranes would arrive from I-5 via 299 or 36. Given the limited daylight hours during winter, the commenter states that supplemental lighting might be needed at the at Humboldt Bay delivery site, which could attract wildlife, but no night lighting or wildlife studies were done at the site.

The commenter states that the potential impacts of noise at Fields Landing was not discussed in the DEIR and is a major omission. Regarding South Bay Depot Road modifications, the commenter states that ownership of the modified land should be addressed to prevent concerns about imminent domain or encroachment. The commenter states that Figure 2 in Appendix M should be larger and show the affected private lands and easements and how public access to the freeway will be maintained, given that the on-ramp is the only south-bound access for the Field’s Landing community and one of the few turnaround points for emergency vehicles.

Please see the response to Comment I170-1, above. Use of Fields Landing is described in Section 2.3.1, “Component Shipping and Staging,” of the DEIR. Please note that the size of barges entering the harbor is limited by the width of the jetty entrance and water depth in the harbor during low tide. In addition, the port captain would be involved in delivery of all barges to the harbor. Fields Landing is the closest commercial potential delivery site for project components, and other alternatives were not studied because they would substantially lengthen the haul route and result in transport through more urban areas.

No imminent domain is required for the project. No further response is required.

I170-4 The commenter expresses concern about how the transport of the project’s large components will affect Highway 101. The commenter states that the description of the changes omits some overpasses and bridges and confuses the names of two exits, and is overall incomplete, preventing a complete understanding of the impacts on Highway 101. The commenter asks that the DEIR be revised to include all bridges, overpasses, underpasses, and exits (including grade crossings) between Fields Landing and Jordan Creek, and provides a list of requested modifications to the DEIR such as more detailed and accurate descriptions and maps.

Please see the response to Comment I170-1. The project description provides sufficient information, including maps of the required route modification. No revisions are required.

I170-5 The commenter asks that the DEIR’s discussion of Hookton Slough Bypass be expanded to include additional mitigation measures, wildlife assessments, dust control measures, revegetation plans, and emergency and public access to surrounding areas and communities.

Please see the response to Comment I170-1. For any impacts that would occur at the Hookton Slough Bypass, the mitigation measures presented in the DEIR apply. There is no need for specific measures for one particular site. No revisions are necessary.

I170-6 The commenter states the DEIR does not discuss how the project would address “the natural landscape, freeway roadside with historic plantings, side roads, small waterways, and access.” The commenter states that no explanation is provided regarding how mature trees and vegetation removed along
Highway 101 would be restored to their preconstruction state. The commenter asks that the DEIR provide waste disposal information.

The commenter asks for clarification of the repeated statement “in accordance with County requirements or permits and authorizations ...” and states that it seems like piecemealing.

The commenter also asserts that the effects of subcontractors are not included in discussions of fuel, greenhouse gasses, noise, and other topics. The commenter states that the calculations of fossil fuels or greenhouse gasses do not include those resulting from construction traffic, including heavy trucks and transport vehicles. The commenter states that the calculations also need to include emissions from fuel, water, and waste disposal vehicles; pace cars; flagger trucks; and vehicles to place and remove cones and signs. The commenter states that the lack of accounting for the emissions from these vehicles is a serious omission. The commenter states that all information about transport should be in one location in the DEIR and not distributed among different sections.

Please see the response to Comment 170-1. The project description in the EIR provides sufficient information to understand the proposed project elements and the impact analyses in the Section 3 provide a thorough analysis of the direct and indirect impacts. No trees will be removed at the temporary highway offramps. The GHG emission analysis included all traffic generated by the project, including subcontractors. No further revisions are necessary.

I170-7 The commenter is seeking to understand how activities at the staging area and batch plant were accounted for in the impact analysis and asks whether the vehicle trip assumptions include trucks hauling waste from the site or fuel deliveries to the site?

Please see the response to Comment I170-1.

I170-8 The commenter states the air quality and transportation and traffic sections of the DEIR must consider the trips from heavy construction equipment hauling components and material deliveries to and from the site. The commenter states it is unclear if this is the case based on information in Section 2 “Project Description” of the DEIR.

Please see the response to Comment I170-1.

I170-9 The commenter states that Table 2-3 in the project description does not mention that it takes up to 400 gallons of oil for a turbine lubricating oil change. The commenter states that there is no mention of chemicals planned for the O&E septic system at Jordan Creek. The commenter states that the DEIR indicates the project O&M activity includes application of herbicides for fire management but no further details are provided, and that no details about how grass in the gen-tie corridor will be managed are given.

Please see the response to Comment I170-1 for details on the project description. Please see the Revegetation, Reclamation, and Weed Control Plan in Appendix B of this FEIR for a discussion of proposed weed control and the potential use of herbicides for vegetation management. The total anticipated water use of the project is discussed in the DEIR.
1170-10 The commenter states that thousands of acres would be at risk of fire from a variety of sources. The commenter states that the omissions in the DEIR give her little confidence that deferred plans presented to local districts will be complete.

Section 3.13, “Fire Protection Services and Wildfire Hazards,” of the DEIR provides an analysis of wildfire impacts and Master Response 11, “Wildfire,” of this FEIR provides further discussion of the history of wildfire in the region and regulatory requirements and mitigation measures that reduce the potential for wildfires.

1170-11 The commenter refers to tables 2-4 and 2-5 in the project description and states that the DEIR overlooks a significant number of workers as well as a significant number of pieces and types of equipment for activities described in the DEIR. According to the commenter, this means that the fossil fuel use might be double or more than what is presented in the DEIR, so the air quality calculations need adjustment.

The commenter provides and opinion but does not provide evidence to substantiate the claims. No revisions are necessary.

1170-12 The commenter states that standard maintenance for the project will result in 30 years of human disruptions in an area where there are now hardly any. The commenter states that night lighting and daytime strobes required by the FAA could have a potentially significant impact. The commenter states that the DEIR does not address the need for high-angle rescue gear and training for local first responders.

The commenter expresses an opinion. Night lighting and strobe or shadow flicker are discussed in Section 3.2 “Aesthetics” of the DEIR. It is unclear why the commenter refers to high angle rescue gear and local responders. No revisions are required.

1170-13 The commenter states that the decommissioning plan is extremely vague, and that if Terra Gen and Humboldt Redwoods Company dissolve in the next 30 years, the County will be left with the cost of the decommissioning. The commenter states that a plan and irrevocable performance bonds should be deposited with the County and with affected landowners. The commenter states that there is little discussion of maintenance needs of component parts, especially large turbine blades, in the DEIR; neither is there adequate discussion of the transport and disposal of used parts. The commenter states that the County could be left with a “massive” liability if there is no performance bond to guarantee the removal of all blades, parts of blades and other components.

Please see the response to Comment I170-1, above. Please also see the responses to Comments I145-1, I149-3, I171-9, and I176-3 related to the decommissioning of the proposed project.

The project lifespan is approximately 30 years and it could be greater if repowering was to occur. It would be speculative to attempt to predict the actions of the owner/operator 30 years into the future. CEQA does not require that decommissioning be evaluated at this time Such a review would be conducted at the time the applicant seeks discretionary approvals to conduct the decommissioning or repowering.

While the probability exists that the applicant could abandon the project after investing the money and time to permit and construct the project, it is highly unlikely. To raise the capital for construction of the
project the applicant must secure a power purchase agreement with a utility provider to show the investors a return on investment. A power purchase agreement is a legally binding financial agreement where a developer arranges for the design, permitting, financing and installation of a renewable energy system and agrees to sell the power generated at a fixed rate covering costs for permitting and construction as well as a return on investment. The contract typically covers a period of 20 to 25 years.

As renewable energy mandates direct California towards a power mix dominated by renewables, the project may undergo repower. Repowering could require a new project approval subject to additional CEQA review. On the other hand it is not clear how changing technologies may change the structure of power generation and delivery in the next 25 year. To attempt to foresee events so far into the future in a rapidly changing world is speculation not forecast. CEQA specifically discourages speculation in an EIR. No revisions are necessary.

1170-14 The commenter states that the DEIR is missing a timber harvest plan. The commenter notes that the impacts section states that the first project construction phase is inconsistent with the provisions of the Humboldt Redwood Company HCP, and the commenter believes that this impact would be potentially significant. The commenter states that there are no marine aquatics permits listed specifically for Fields Landing.

Project related timber harvest within the gen-tie corridor would be conducted by HRC crews operating under a Timber Harvest Plan to be prepared consistent with Forest Practice Rules. The timber would be the property of HRC and would be counted towards the sustainable yield which is calculated to be 914,618 net million board feet over a 5-year period. The project would not alter the ability of HRC to harvest timber within its landholdings or conflict with the HCP. No specific “marine aquatics permits” are needed for Fields Landing. Fields Landing is a commercial harbor and the shipment of material into a commercial harbor does not require “marine aquatics permits.”

170-15 The commenter states Section 3.1.1, “Land Use and Planning,” provides the zoning for the project, which lays out the rules the document should follow, and provides the names of subsections that will be addresses later. Regarding military overflights, the commenter states there is no indication that the military has been contacted about the project.

The commenter makes a statement regarding the purpose of the land use and planning section. The commenter further expresses the opinion that the military should be contacted regarding the proposed project. This comment does not raise specific questions or request information that pertains to the adequacy of the DEIR for addressing adverse physical impacts associated with the project, nor does it contain an argument raising significant environmental issues. No further response is required.

1170-16 The commenter questions how 300 temporary workers in the area could be considered to have “no impact” when there is no housing available to them. The commenter states that there is a substantial homeless problem in the area. The commenter states that 300 people represent about 10% of the population of Rio Dell, and that the temporary workers would have a significant impact on housing. The commenter states that the DEIR does not adequately address the water needs of 300 temporary workers. The commenter states that the DEIR does not adequately address potential wastewater and sanitation impacts from the temporary workers and believes there is a significant potential for stream contamination because of the project’s location on a ridge. The commenter states that the DEIR contradicts itself by
stating that many workers would come from the local labor pool and that the builders would be temporary and result in no impact.

The comment mischaracterizes the nature of construction activity because not all 300 laborers would be on site during a single phase of construction. Project construction is sequential in nature with distinct trades completing tasks required for the next step in the process. For instance, the initial stage involves land clearing and logging to create new and modify existing roads, establish turbine pads, and excavate foundations. Then the turbines are transported to the site by specialized moving teams, and crews assemble and erect each turbine.

As noted in Section 3.1.2, “Population and Housing,” the project would not result in a permanent increase in population that would induce new housing or displace existing housing stock. Also see Section 5.1.2, “Growth Inducing Impacts of the Project,” where the DEIR indicates that some jobs may be filled by the local labor force and notes that approximately 1,930 of the unemployed in Humboldt County are those involved in the construction trades.

I170-17 The commenter attempts to calculate the water demand and wastewater generated during construction noting that the DEIR appears to only quantify water during operations but fails to identify construction related water use and entirely fails to quantify effluent generated by 300 construction workers. The commenter continues by noting the DEIR also fails to evaluate impacts to recreation and other public services.

The commenter is providing opinions on the project description and speculating that all construction workers would be onsite at a single time; resulting in substantial demands on local services. The issue of services and utilities was scoped out of the EIR during the Notice of Preparation period. Early consultation allows the lead agency to identify the range of actions, alternatives, mitigation measures and significant effects to be analyzed in depth within the DEIR. No comments providing a fair argument were made during the noticing period on the DEIR.

I170-18 The commenter notes that the discussion of shipping components to Fields Landing does not identify delivery of a crane for erection of the turbine and fails to consider impacts on protected mammals. The commenter also states energy demand associated with construction equipment and fueling associated with vehicles and equipment operating onsite does not appear to be accounted for in the analysis.

Refer to Section 3.8, “Greenhouse Gases” in the DEIR for the estimated energy demand during both the construction and operation of the project. Impacts on wildlife are evaluated in Section 3.5, “Biological Resources.”

I170-19 The commenter states the proposed project will use enormous amounts of sand and gravel during construction. The commenter asks for an accurate accounting of the amount of mineral resources the project will use compared with the regular rate of extraction per year in the County.

The commenter asks for very specific information of interest to them. This comment does not raise specific questions or request information that pertains to the adequacy of the DEIR for addressing adverse
physical impacts associated with the project, nor does it contain an argument raising significant environmental issues. No further response is required.

I170-20 The commenter states that the DEIR does not address the project’s impact on views or visibility and cites multiple concerns with KOPs.

Please see the responses to Comments R3-8, R3-9, R3-10, R3-18, I149-1, which address visual impacts and lighting. No revisions are necessary.

I170-21 The commenter states that night time lighting will create light pollution, and that Section 3.5b does not discuss the effects of blinking red FAA mandated lights or daytime strobes on birds and bats or address the impacts of shadow flicker. The commenter states that the project fails goals of the Humboldt County Plan regarding protections for local landowners, scenic resources, and the environment. The commenter states that the DEIR does not address the potential effects on down-wind sites and cites journal articles and research to support their opinions.

Please see the responses to Comments R3-8, R3-9, R3-10, R3-18, and I149-1, which address visual impacts and lighting. Shadow flicker is addressed in Section 3.2, “Aesthetics,” of the DEIR in Impact 3.2-4 on page 3.2-65. Because of the lack of strong evidence of health impacts resulting from shadow flicker, this impact is found to be less than significant.

Section 2.4.2, “Public Access and Safety,” of the DEIR addresses Federal Aviation Administration (FAA) requirements for lighting on the proposed turbines. Through its Notice of Proposed Construction or Alteration (Form 7460.1), the FAA would conduct a review of the proposed project before construction begins (Title 14, Part 77 of the Code of Federal Regulations). The turbines proposed under all generation options would be more than 200 feet tall and therefore would require appropriate obstruction lighting. However, the FAA may determine that the absence of marking and/or lighting would not threaten aviation. As a result of its review process, the FAA might recommend installing tower markings or aviation safety lighting on all or only a portion of the turbine towers.

I170-22 The commenter states that the DEIR does not mention changes to taxation on parcels affected by the project. The commenter states that the DEIR indicates that the project will involve building in winter, but the commenter states that this violates the Humboldt Redwoods Habitat Conservation Plan. The commenter states that the DEIR does not discuss downwind effects. The commenter states that the DEIR does not mention a timber protection plan, habitat conservation plan, or timber harvest plan regarding the gen-tie clear cut. The commenter quotes the California Timberland Productivity Act of 1982 and states that generation facilities do not appear to be a conforming use, and states that the DEIR should address this. The commenter cites additional studies and expresses the opinion that these studies should have been considered in the DEIR.

The project is proposed on land owned by Humboldt Redwood Company LLC (HRC), which owns and manages 209,200 acres of forestland in southern Humboldt County. Timber harvest and forestry management are the primary activities on HRC lands, with approximately 203,000 acres of landholdings including the project site and gen tie corridor available for harvest if such activity is conducted consistent with conservation protocols required by the HRC HCP.
Project related timber harvest within the gen tie corridor would be conducted by HRC crews operating under a Timber Harvest Plan to be prepared consistent with Forest Practice Rules. The timber would be the property of HRC and would be counted towards the sustainable yield which is calculated to be 914,618 net million board feet over a 5-year period.

Regarding comments regarding consistency with the HRC HCP, please see Master Response 8, “Conflict with Adopted HCP.”

With regard to taxation on Williamson Act parcels, neither the DEIR nor this FEIR are intended to address social or economic impacts. “An economic or social change by itself shall not be considered a significant effect on the environment” (CEQA Guidelines Sections 15131 and 15382).

I170-23 The commenter states that the DEIR models do not account for construction-related emissions.

Impact 3.4-1 (Short-Term, Construction-Generated Emissions of ROG, NOX, and PM10) in Section 3.4, “Air Quality,” of the DEIR provides a detailed discussion of project activities that would generate construction-related emissions. Tables 3.4-3 and 3.4-4 summarize the modeled daily and annual emissions, respectively, of ROG, NOX, PM10, and PM2.5 associated with construction of the proposed project. Appendix B of the DEIR provides modeling input and output parameters, detailed assumptions, and construction emissions estimates. Implementing Mitigation Measure 3.4-1 (Use Current-Phase Equipment for all Construction Off-Road Vehicles and Equipment) would reduce construction-related emissions of ROG and NOX. As shown in Tables 3.4-5 and 3.4-6, maximum daily emissions of NOX would still exceed NCUAQMD threshold of significance. Therefore, the DEIR determined this impact would be significant and unavoidable.

I170-24 The commenter states that the DEIR does not discuss bat barotrauma. The commenter questions the potential effectiveness of deterring corvids to help mitigate marbled murrelet losses. The commenter states that the USFWS has issued marbled murrelet recovery guidelines but they are not cited in the DEIR. The commenter questions the accuracy of using Google Earth for measurements used in the DEIR. The commenter states that the mortality search area should be specified as well as the times and methods to be used.

The commenter correctly notes that turbines can result in bat fatalities from barotrauma in addition to collisions with turbine blades. That level of detail was not a necessary element of the DEIR’s analysis of operational impacts of the project on bats and would not have changed the conclusions in the DEIR regarding the impacts of the project on bats. Please see Master Response 4, “Bats,” for additional discussion of project impacts on bats and refined language that has been added to Mitigation Measure 3.5-18d (Implement Operational Minimization Measures and Mitigation) in the DEIR to further clarify proposed avoidance and minimization measures to avoid population level impacts on bats. Please note that these measures apply to all bat species.

Regarding impacts on species, the commenter states that only the ridge-top footprint was studied, but not the gen-tie line, and that Fields Landing is not mentioned, and no eelgrass study was conducted. The commenter states that sections of the DEIR are light on scientific references and citation, have one year or less of data, and are supported by too many personal communications. The commenter states that no murrelet were sampled in the planned footprint of the gen-tie, which is a significant absence of data collection. The commenter states that the mitigation measures proposed for the murrelet do not seem related to the natural history of the species or the impact the project will have on the species.


Please also see the response to Comment S4-21 regarding eel grass surveys and additional mitigation language included in the FEIR.

The commenter states that a discussion of California fully protected species should have been included in the DEIR. The commenter states that the eagle surveys were insufficient. The commenter states that the DEIR states that eagles will be killed, but questions how this would be allowed to happen given that bald eagles, golden eagles, and white-tailed kites are protected by law.

Please see Master Response 5, “Migratory and Special-Status Birds,” and Master Response 6, “Eagles and Other Raptors,” for detailed information on eagles and birds. Fully protected species are addressed in the Section 3.5, “Biological Resources,” of the DEIR, along with all other special-status species. No revisions are necessary.

The commenter states that the clearing of habitat for the project footprint would have a deleterious impact on northern spotted owls, and that the DEIR does not provide enough information about this impact or proposed mitigation measures. The commenter questions the raptor mortality rates estimated in the DEIR. The commenter states that the Burney EIR referenced in the DEIR is not relevant to the project because it is for an inland site with very different surroundings.

Please see Master Response 3, “Northern Spotted Owl,” for additional information on surveys conducted in 2019, an updated summary of impact acreages, and a refined mitigation measure for impacts on northern spotted owl habitat. No further revisions are necessary.

The commenter states that according to the DEIR, mitigation for avian deaths will not begin for three years. The commenter questions the number of raptors estimated in the DEIR to be taken by the project and questions why the project would be allowed to take legally protected species. Per the commenter, the DEIR states that the Cape Mendocino Grasslands Important Bird Area (IBA) is in the project area and
that Fields Landing near Humboldt Bay is also an IBA but does not acknowledge that siting a wind farm nearby sets the stage for later impacts.

Please see Master Response 5, “Migratory and Special-Status Birds,” for a discussion of fully protected species and the Cape Mendocino Grasslands IBA. No further revisions are necessary.

1170-29 The commenter states that the background information provided on horned larks is insufficient because the DEIR was rushed and only an incomplete literature review was performed. The commenter states that the DEIR’s proposal to conduct post-construction mortality monitoring for the first three years of the project and “road and pad” thereafter is insufficient.

Please see the response to Comment S4-12 and Master Response 5, “Migratory and Special-Status Birds,” which discusses potential construction impacts on the horned lark population.

1170-30 The commenter states that the 10 bat sampling locations did not cover enough of the project’s footprint and that the studies were too short. The commenter states that the DEIR is inconsistent in the number of bat species found in the area. The commenter questions the lack of citations in the DEIR that would support the statement that the killing of adult Townsend’s big-eared bats would be mitigated by artificially creating bat roosts in trees or by creating artificial roosts. The commenter states that the bat studies are incomplete, and the bat mitigation measures are incomplete or inadequate.

Please see the response to Comment I170-24. Regarding the commenter’s statement about the proposed mitigation for potential impacts on Townsend’s bat roosts, please note that CDFW recommends creation of artificial roosts as a management approach for Townsend’s big-eared bats. In CDFW’s Status Review of Townsend’s Big-Eared Bat In California (CDFW 2016 page 59) one of their management recommendations is to create artificial roosts: “Implement basal hollow creation projects to increase opportunities for Townsend’s big-eared bats to use tree roosts in coastal redwood forests (and possibly interior forests where large tree species, such as giant sequoia, have the potential to serve as roost sites.)”

1170-31 The commenter disagrees with the DEIR’s assessment of the number of red-legged frogs in the area and questions the lack of mitigation in the DEIR for the loss of their habitat at wetland locations that will be affected by the project. The commenter states that a pre-construction survey plan for amphibians and reptiles should have been done before the DEIR was issued rather than being proposed as a mitigation measure. The commenter states that a special status plant survey is needed because the DEIR’s information on the subject comes from the California Native Plant Society or personal communications. The commenter questions why no eelgrass survey was performed.

Please see Master Response 7, “Special-Status Plants and Sensitive Communities,” for information regarding surveys for special-status plants. Please also see the response to Comment S4-21 regarding eelgrass surveys. Please also see the Revegetation, Reclamation, and Weed Control Plan in Appendix B of this FEIR.

As originally described in the DEIR, the 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, which expressed a concern about potential frac-outs during drilling, the project
The applicant has agreed to cross the Eel River with an overhead realignment as described in Alternative 2 in the DEIR.

1170-32 The commenter states that Table 3.5-15 “Sensitive Natural Communities Other than Riparian Habitats,” does not use standard nomenclature and groups species together in a non-standard way. The commenter states that the sensitive vegetation communities in the table are not the same as the communities listed by the CDFW, so it is not possible to compare them, and a full list should be provided.

The information in Table 3.5-15 is based in the Botanical Resources Report included in Appendix G of the FEIR which in turn uses a list of sensitive natural communities published by CDFW. No revisions are necessary.

1170-33 The commenter states that the plan in the DEIR to replace trees does not specify species ratio, composition, or sex. The commenter asks where the land is that will replace the area that is cut. The commenter states that there is no compensation offered for trees cut in the gen-tie line or a timber harvest plan for those trees.

Please see the Reclamation, Revegetation, and Weed Control Plan (Plan) prepared by Stantec Consulting Services Inc., dated September 23, 2019 in Appendix B in this FEIR. As described in the plan temporary impacts on sensitive plant communities will be restored on site. For areas of permanent impacts off-site restoration may occur if needed to achieve compensatory mitigation goals described in the Plan. Revegetation and mitigation will be required not only by the Humboldt County Planning & Building Department but by agencies such as the U.S. Army Corps of Engineers the Regional Water Quality Control Board, and CDFW. Humboldt County and these agencies will assure that restoration and mitigation occur as required in the plan and as required to satisfy permit conditions.

1170-34 The commenter takes issue with the DEIR’s statement that the project applicant would apply for a coastal development permit and comply with its conditions and therefore no impact would occur, stating that it is not the intent of CEQA to postpone mitigation.

Please refer to the response to comment letter S5 for specific responses to comments submitted by the California Coastal Commission.

1170-35 The commenter references a statement in the DEIR that construction would occur during the rainy season although it is not allowed by the Humboldt Redwood Company HCP due to erosion concerns. The commenter states that it is troublesome that the applicant can choose whether to honor the HCP. The commenter questions why there is no mention of measures during the first phase of the project, which is logging and vegetation removal. The commenter mentions potential landslides.

Consistency with the HRC HCP is address in Master Response 8, “Conflict with Adopted HCP.”

1170-36 The commenter refers to the project’s potential to damage or destroy cultural resources, which the commenter states would be a potentially significant impact. The commenter states that the cultural significance of Bear River Ridge is not mentioned in Table 3.6-2. The commenter states that she agrees with the Wiyot people that Bear River Ridge should not be installed with wind turbines, which would result in a significant and unavoidable impact for which no feasible mitigation exists. The commenter refers to the planned reintroduction of California condors by the Yurok Tribe and the DEIR’s statement
that potential exists for their collision with turbines. The commenter states that because these birds are a fully protected species under California law, such taking is not lawful. The commenter questions the planned delay of 6 months after condor release to take protective action and questions the efficacy of the plan to use the birds' transponders to stop the turbines when condors are in the vicinity.

Please see the responses to Comments 148-1 and 148-2. Please also refer to the response to comment letter T1 for specific responses to comments submitted by the Yurok Tribe and response to comment letter T2 for specific responses to comments submitted by the Wiyot Tribe. Regarding concerns about condors, please see the response to Comment I65-1.

1170-37 The commenter states that because the DEIR does not present details about the turbines or their planned locations, and because a site study has not been performed “as required,” potential risks and hazards during an earthquake cannot be assessed. The commenter states that fault lines under the project site have not been adequately mapped in the DEIR. The commenter states that the lack of height or faceplate information hinders the County from being able to assess potential risks from turbines falling over due to seismic activity or wind or both. The commenter states that the DEIR does not discuss potential effects on seismic detection stations due to turbine seismic noise, so it is impossible to assess the potential risks.

Seismic activity is discussed in Impact 3.7-2 (Possible Risks to People and Structures CAUSED BY Strong Seismic Ground Shaking) in Section 3.7, “Geology and Soils,” of the DEIR. As discussed in Impact 3.7-2, in association with the building permit issued for the project, a site-specific, design-level geotechnical report must be prepared by a licensed geotechnical engineer, per California Building Code requirements. This report is a final, design-level geotechnical subsurface investigation report that includes subsurface testing of soil and groundwater conditions to identify site-specific geology and soil characteristics that the final engineering design should consider during preparation of grading and building plans. Recommendations of the geotechnical engineering report are incorporated into the plans submitted for grading and building permits. The geotechnical engineering report is subject to review by and approval of the County’s Planning & Building Department. Because the California Building Code already provides for adequate protection to reduce the exposure of people and structures to the adverse effects of surface fault rupture, this impact would be less than significant.

As discussed in Impact 3.7-4 (Erosion during Project Construction and Operation) in Section 3.7, “Geology and Soils,” of the DEIR, to comply with existing state and local regulatory requirements, a grading and erosion control plan must be prepared for the project. The project applicant must retain a California-registered Civil Engineer who will prepare a grading and erosion control plan meeting the requirements outlined in the County Code. The grading and erosion control plan must contain the information listed in the County’s Grading and Erosion Control Ordinance, including the location, implementation schedule, and maintenance schedule of all erosion and sediment control measures; a description of measures designed to control erosion and dust and stabilization of the construction sites and permanent erosion control measures for project components after construction; and a description of the location and methods of storage and disposal of construction materials. Further, the project would implement Mitigation Measure 3.10-1 (Implement Wet-Weather BMPs Consistent with the Humboldt Redwood Company Habitat Conservation Plan) in Section 3.10, “Hydrology and Water Quality,” of the DEIR, which requires water quality monitoring and reporting to the County Department of Public Works.
as part of the erosion control plan. Given this compliance with state and local regulations and implementation of Mitigation Measure 3.10-1, this impact would be less than significant.

Public Resources Code Section 21081.6 requires adoption of a “reporting or monitoring program for the changes to the project which it has adopted or made a condition of a project approval to mitigate or avoid significant effects on the environment.” As required by Public Resources Code Section 21081.6, and Sections 15091(d) and 15097 of the CEQA Guidelines, the County, in adopting findings for the proposed project, will adopt a Mitigation Monitoring and Reporting Plan. The Mitigation Monitoring and Reporting Plan will be under a separate cover and provided to all construction contractors by the County.

I170-38 The commenter disputes the DEIR’s statements about greenhouse gas emissions and the project’s potential to produce carbon-free energy and asserts that the DEIR does not provide enough information to support the statements. The commenter believes that the DEIR’s impact analysis of GHG emissions is flawed and that all impacts are potentially significant.


I170-39 The commenter states that the lack of an operation and maintenance program prevents an analysis of the risk of accidents during wind turbine operations. The commenter asks whether the plan to limit access to wind generation facilities as an accident prevention measure means that public access to Bear River Ridge and Monument Road will be limited, and states that this is not discussed in the DEIR.

Maintenance activities are described in Section 2.4.1, “Operations and Maintenance Plan,” in Chapter 2, “Project Description,” of the DEIR. As stated in Section 2.4.1, the project applicant would develop an O&M protocol to be implemented throughout the life of the project. The protocol would specify routine turbine maintenance and operation that would typically adhere to the maintenance requirements prescribed by the turbine manufacturer. O&M personnel would find conduct maintenance activities for each wind turbine required by the routine schedule provided by the turbine supplier, or as required to keep the equipment in excellent operation.

Public access across most of the project site is presently restricted since the land is privately owned. Limited access would be provided to those users authorized to access the property, such as grazing permittees or employees of communications companies with transmission facilities, at the discretion of the underlying landowner.

The on-site substation would be fenced with a chain-link fence to prevent public and wildlife access to high-voltage equipment. Safety signs would be posted in conformance with applicable federal and state regulations around all towers (where necessary), transformers, and other high-voltage facilities and along roads.

I170-40 The commenter describes the physical setting of the landscape noting the presence of multiple drainage features that have been disturbed by past activity leading to soil erosion and sedimentation in the Eel
River. The commenter states potential project impacts on groundwater supplies associated with demand from 300 construction workers is not considered.

Please see the response to Comment I170-37 for information on soil erosion and sedimentation. Please also see the response to Comment I170-16 regarding temporary workers.

I170-41 The commenter questions the DEIR’s noise analysis and asks that it be redone. The commenter questions the DEIR’s conclusion that the impact from noise would be less than significant, and states that the DEIR does not address potential secondary noise impacts from any repair work performed on the project. The commenter states that the DEIR is contradictory, both referring to impacts from noise as being less than significant and stating that County noise limits would be exceeded. The commenter states that there is not enough information provided in the DEIR regarding low-frequency and infrasonic noise for an assessment of the potential impacts.

Please see the responses to Comments I121-1 and I123-1, which address noise and vibration.

I170-42 The commenter questions the DEIR’s statement that the project’s traffic impacts would be less than significant, considering the size and weight of delivery vehicles. The commenter believes that the local roads would be damaged, and their useful life shortened.

The effect of component transport on local roads is thoroughly evaluated in the DEIR. Care has been taken to distinguish between temporary impacts such as moving a traffic sign or tree trimming that would occur as needed to accommodate oversize components, and permanent impacts that comprise the project footprint after construction and reclamation of temporarily disturbed area. Section 3.12, “Transportation and Traffic” in the DEIR analyzes the proposed project impacts on traffic, including specific impacts to Highway 101 during construction.

Mitigation measures identified in Section 3.12, “Transportation and Traffic,” of the DEIR require the construction contractor to obtain Caltrans permits for wide and heavy loads and repair any damage sustained to Highway 101 as a result of the project.

I170-43 The commenter quotes portions of the DEIR primarily related to cumulative impacts, specifically noting that in their opinion, the proposed project’s use of the existing electric grid would preclude the use of that grid by other power sources, suggest as large scale solar and off shore wind. The commenter also states the belief that secondary impacts associated with the project could include changes to the fog layer and that other cumulative effects would result from removal of trees for the WTGs and gen-tie and decommissioning.

The project would provide a source of renewable energy to support the State GHG reduction goals contained within Senate Bill (SB) 32 and Executive Order (EO) S-3-05I. The sale and transmission of energy in the state is regulated by California Independent System Operator (CAISO). The CAISO uses a sophisticated system of controls to ensure electric generation matches demand and the load on the system are balanced. If supply and demand are not in balance, shutdowns of generating plants and transmission equipment may be required to prevent damage. To reduce the risk of such failures, electric transmission networks are interconnected into regional, national or continent-wide networks that offer redundant
alternate routes for power to flow should (weather or equipment) failures occur. It is outside the scope of the EIR to consider capacity of the transmission system which is regulated by the independent operator.

The remainder of the comment offers speculation across a wide array of topics. Please refer to the response to comment I170-1 through I170-60 for responses to these and other comments.

170-44 The commenter provides additional quotes from the DEIR, but primarily, this comment appears to focus on concerns regarding introduction of temporary workers associated with the project.

Please see the response to comment I 170-40 above.

1170-46 The commenter expresses concern over the change in land use from forest land to an industrial use for the project and states the opinion that the -statement in the DEIR that the project would not result in irreversible damage is unsupportable.

This comment provides opinion that is not substantiated with evidence. The DEIR provides a comprehensive evaluation of the direct, indirect and cumulative impacts of the project. Note that the construction activity would be staged so that not all 300 workers are active on site at a single point in time.

1170-47 The commenter identifies 37 mitigation measures in the DEIR and states these mitigation measures are deferred because the plans have not been prepared.

Mitigation measures may specify performance standards which would mitigate the significant effect of the project and which may be accomplished in more than one specified way. The specific details of a mitigation measure, however, may be developed after project approval when it is impractical or infeasible to include those details during the project’s environmental review provided that the agency (1) commits itself to the mitigation, (2) adopts specific performance standards the mitigation will achieve, and (3) identifies the type(s) of potential action(s) that can feasibly achieve that performance standard and that will considered, analyzed, and potentially incorporated in the mitigation measure. Compliance with a regulatory permit or other similar process may be identified as mitigation if compliance would result in implementation of measures that would be reasonably expected, based on substantial evidence in the record, to reduce the significant impact to the specified performance standards (Guidelines Section 15126.4)

The specific design of the mitigation can be permissibly deferred where mitigation is known to be feasible, but practical considerations prevent a lead agency from establishing specific standards early in the development process. Such deferral of the specific design of mitigation is permissible when the lead agency commits itself to devising mitigation measures that will satisfy specific performance standards for evaluating the efficacy of the measures and the project implementation is contingent upon the mitigation measures being in place (Oakland Heritage Alliance v. City of Oakland (2011) 195 Cal.App.4th 884; POET, LLC v. California Air Resources Board (2013) 218 Cal.App.4th 681, 735-738; Sacramento Old City Association v. City Council (1991)229 Cal.App.3d 1011, 1028-1029).
The commenter summarizes identifies additional impacts from the DEIR that were determined to be less than significant but that she feels should be potentially significant. The impacts identified in this comment were the same impacts identified in comments I170-21 to I170-40.

Please see the responses to Comments I170-24 to I170-30 regarding biological resources cited in the comment. Please see the response to Comment I170-21 regarding visual resources and shadow flicker. Please also see the response to Comment I170-23, regarding air quality, and the response to Comment I170-47, regarding deferral of mitigation.

Regarding comments regarding consistency with the HRC HCP, please see Master Response 8, “Conflict with Adopted HCP.”


The commenter states other alternatives to the proposed project should have been considered that would lessen project impacts identified in the DEIR. The commenter provides examples of other alternatives that should have been considered.

The DEIR’s alternatives analysis meets the CEQA requirements. As stated in Chapter 6, “Alternatives,” of the DEIR, each alternative was evaluated according to the “rule of reason” and general feasibility criteria suggested by the State CEQA Guidelines Section 15126.6, as follows:

“The range of alternatives required in an EIR is governed by a ‘rule of reason’ that requires the EIR to set forth only those alternatives necessary to permit a reasoned choice. The alternatives shall be limited to ones that would avoid or substantially lessen any of the significant effects of the project. Of those alternatives, the EIR need examine in detail only the ones that the lead agency determines could feasibly attain most of the basic objectives of the project. The range of feasible alternatives shall be selected and discussed in a manner to foster meaningful public participation and informed decision making.”

The County has considered a range of alternatives that could feasibly attain most of the basic project objectives identified in Section 2.2.2, “Project Objectives,” of Chapter 2, “Project Description,” and avoid or substantially lessen one or more significant effects. Please also see Master Response 12, “Alternatives,” for further discussion.

The commenter summarizes topics she feels were left out of the DEIR. The majority of these topics were identified in Comments I170-2 to I170-12 as well as I170-16, I170-27, I170-21, I170-39, and I170-27.

Please refer to the response to Comment I170-1 as well as I170-14 regarding timber harvest, I170-16 regarding temporary workers, I170-27 regarding owls, I170-21 regarding visual resources, I170-39 regarding maintenance, and S4-21 regarding eel grass surveys.

The commenter summarizes their concerns regarding soils, seismicity, and wildfires. These concerns were also identified in Comments I170-10 and I170-37.

Please refer to the response to Comment I170-1 as well as I170-37 regarding soils and seismicity.
1170-52 The commenter summarizes comments related to construction during winter. These concerns were also identified in Comment I170-4 and I170-22.

Please see the responses to Comments I170-4 and I170-22 regarding construction activities during winter.

1170-53 The commenter summarizes concerns related to public safety and damage to Highway 101. These concerns were also identified in Comment I170-12 and I170-42.

Please see the response to Comment I170-1 as well as I170-12 regarding public safety, and I170-42 regarding repairs to Highway 101.

1170-54 The commenter questions data modeling since they feel no data regarding noise and seismicity is available for turbines and states that the alternatives were confusing.

Please see the responses to Comments I170-1 and I170-49 regarding alternatives.

1170-55 The commenter generally summarizes comments related to marbled murrelets, bats, fully protected species, raptors and eagles, avian deaths, and California condors identified in Comments I170-24 to I170-30 and I170-36.

Please see the responses to Comments I170-24, I170-27, and I170-30 regarding bats; I170-24 and I170-25 regarding marbled murrelets; I170-27 regarding fully protected species, including raptors; I170-28 regarding avian deaths; and I170-36 regarding California condors.

1170-56 The commenter questions the accuracy of the greenhouse gas modeling. These questions were also identified in Comment I170-38.

Please see the response to Comment I170-38 regarding the greenhouse gas analysis. Please also see Section 3.8 “Greenhouse Gas Emissions,” of the DEIR for an analysis of greenhouse gases and Master Response 9, “Adequacy of the Greenhouse Gas Analysis,” of the FEIR for additional in-depth information regarding the adequacy of the greenhouse gas analysis.

1170-57 The commenter states the EIR was prepared in a hurry, the studies and engineering drawings are incomplete, and that the alternatives were not separately modeled or described in the text.

Please see the responses to Comments I170-1 as well as I170-47 regarding performance standard and I170-49 regarding alternatives.

1170-58 The commenter generally summarizes comments related to marbled murrelet, bats, fully protected species, raptors and eagles, horned larks, and California condors identified in Comments I170-24 to I170-30 and I170-36.

Please see the responses to Comments I170-24, I170-27, and I170-30 regarding bats; I170-24 and I170-25 regarding marbled murrelet; I170-27 regarding fully protected species, including raptors; I170-28 regarding avian death; I170-29 regarding horned lark; and I170-36 regarding California condors.
The commenter expresses the opinion that there is no demonstration of good neighbor behavior because traffic would affect Rio Dell, water would come from Scotia’s log pond, and the HCP would be violated.

The commenter expresses the opinion that there is no demonstration of good neighbor behavior. This comment does not raise specific questions or request information that pertains to the adequacy of the DEIR for addressing adverse physical impacts associated with the project, nor does it contain an argument raising significant environmental issues. No further response is required.

The commenter provides a summary of their comments and conclusions provided in this comment letter.

Please see the responses to Comments I170-1 to I170-59.
I171-1 The commenter expresses concern that a number of studies have been deferred, such as geotechnical reports and grading plans, and that the Mitigation Monitoring and Reporting Program is not included in the EIR. The commenter further states the opinion that such deferment is in direct contrast to the Sundstrom v. County of Mendocino CEQA case.

Please see the responses to Comments 171-6 and 171-7 regarding geologic technical reports and grading plans. As stated in these responses, the project applicant would be required to comply with state and local regulations related to preparation of geotechnical reports and grading plans, and implementation of Mitigation Measure 3.10-1 (Implement Wet-Weather BMPs Consistent with the Humboldt Redwood Company Habitat Conservation Plan) would reduce impacts to less-than-significant. Compliance with a regulatory permit or other similar process may be identified as mitigation if compliance would result in implementation of measures that would be reasonably expected, based on substantial evidence in the record, to reduce the significant impact to the specified performance standards (Guidelines Section 15126.4).

Public Resources Code Section 21081.6 requires adoption of a “reporting or monitoring program for the changes to the project which it has adopted or made a condition of a project approval to mitigate or avoid significant effects on the environment.” As required by Public Resources Code Section 21081.6, and Sections 15091(d) and 15097 of the CEQA Guidelines, the County, in adopting findings for the proposed project, will adopt a Mitigation Monitoring and Reporting Plan. The Mitigation Monitoring and Reporting Plan will be under a separate cover and provided to all construction contractors by the County.

I171-2 The commenter believes that the comment period for the DEIR should be at least 60 days.

Guidelines section 15105(a) provides that the public review of a DEIR that is submitted to the State Clearinghouse shall not be less than 45 days nor should it be longer than 60 days except under unusual circumstances. The review period was initially from April 15 until June 5, 2019, (51 days) then was extended for another nine (9) days, to June 14, 2019. This resulted in a public review period of 60 days. Please also see the response to Comment I25-1 for a summary of how the County and the applicant have provided opportunities for public comment.

I171-3 The commenter expresses the opinion that the project would have a detrimental impact on visual resources. The commenter expresses the opinion that the DEIR minimizes the visual impacts in the photo renderings.

Please see the responses to Comments R3-8, R3-9, R3-10, R3-18, I149-1, which address visual impacts and FAA lighting requirements. The project’s impact on aesthetic resources, including visual resources are analyzed in Chapter 3.2, “Aesthetics,” of the DEIR. The analysis finds impact on scenic vistas and the visual character of the site significant and unavoidable. The analysis was conducted by experienced professionals according to industry standards and were not “minimized” as alleged by the commenter.
The commenter expresses the opinion that the proposed project will decrease property values.

This comment does not raise specific questions or request information that pertains to the adequacy of the DEIR for addressing adverse physical impacts associated with the project. This comment is published in this Response to Comments document for public disclosure and for decision maker consideration. In addition, this DEIR is not intended to address social or economic impacts. “An economic or social change by itself shall not be considered a significant effect on the environment” (CEQA Guidelines Sections 15131 and 15382).

The commenter believes that the impacts to wildlife, including marbled murrelets, Northern spotted owls, bald and golden eagles and other birds are likely understated. The commenter further questions the project’s effects on condors.

As described in Section 3.5, “Biological Resources,” the DEIR has provided a complete and thorough evaluation of all potentially affect wildlife species and committed the County to the required mitigation measures, has presented clear performance standards that have been further refined in this FEIR, and has described the means of mitigating impacts that would achieve the performance standards. Please also see Master Responses 2 through 8 for additional detail related to the analysis of impacts on biological resources, a discussion on additional surveys conducted since circulation of the DEIR, and additional refinements to the mitigation measures in the DEIR. Please also see the response to Comment I65-1 regarding California condors.

In addition, the project applicant has refined the footprint of the proposed project to avoid or minimize impacts on sensitive resources since circulation of the DEIR. Please see Master Response 1, “Site Planning and Avoidance Measures” and “Refinements to the Project Description Since Circulation of the DEIR” in Chapter 1 of this FEIR for the specific refinements that have been made to the project description.

The commenter expresses concern that a geologic report and grading plan were not included in the DEIR and states the opinion that the project area is seismically active and has a history of landslides. The commenter further expresses the opinion that the project is in direct contrast to the Sundstrom CEQA case.

Seismic activity is discussed in Impact 3.7-2 (Possible Risks to People and Structures Caused by Strong Seismic Ground Shaking) in Section 3.7, “Geology and Soils,” of the DEIR. As discussed in Impact 3.7-2, in association with the building permit issued for the project, a site-specific, design-level geotechnical report must be prepared by a licensed geotechnical engineer, per California Building Code requirements. This report is a final, design-level geotechnical subsurface investigation report that includes subsurface testing of soil and groundwater conditions to identify site-specific geology and soil characteristics that the final engineering design should take into account during preparation of grading and building plans. Recommendations of the geotechnical engineering report are incorporated into the plans submitted for grading and building permits. The geotechnical engineering report is subject to review by and approval of the County’s Planning & Building Department. Because the California Building Code already provides for adequate protection to reduce the exposure of people and structures to the adverse effects of surface fault rupture, this impact would be less than significant.
Landslides hazards are discussed in Impact 3.7-3 (Possible Risks to People and Structures Caused by Seismic-Related Ground Failure, Liquefaction, and Landslides) in Section 3.7, “Geology and Soils,” of the DEIR. As discussed in Impact 3.7, the proposed project would comply with existing state and local regulatory requirements to conduct a site-specific geotechnical investigation and implement the recommendations of the study during project design and construction. Such compliance would prevent structures and people from being exposed to landslide hazards by limiting cut and fill slope angles to produce grossly and surficially stable slopes; incorporating benches at a set interval; and requiring placement of fill slope keyways into dense, native bedrock materials where necessary. Incorporating engineering design measures would reduce the risk of slope instability, thus removing the potential for exposure of people and structures to the adverse effects of seismic-related ground failure, liquefaction, or landslide hazards. Therefore, this impact would be less than significant.

As discussed in Impact 3.7-4 (Erosion during Project Construction and Operation) in Section 3.7, “Geology and Soils,” of the DEIR, to comply with existing state and local regulatory requirements, a grading and erosion control plan must be prepared for the project. The project applicant must retain a California-registered Civil Engineer who will prepare a grading and erosion control plan meeting the requirements outlined in the County Code. The grading and erosion control plan must contain the information listed in the County’s Grading and Erosion Control Ordinance, including the location, implementation schedule, and maintenance schedule of all erosion and sediment control measures; a description of measures designed to control erosion and dust and stabilization of the construction sites and permanent erosion control measures for project components after construction; and a description of the location and methods of storage and disposal of construction materials. Further, the project would implement Mitigation Measure 3.10-1 (Implement Wet-Weather BMPs Consistent with the Humboldt Redwood Company Habitat Conservation Plan) in Section 3.10, “Hydrology and Water Quality” of the DEIR, which requires water quality monitoring and reporting to the County Department of Public Works as part of the erosion control plan. Given this compliance with state and local regulations and implementation of Mitigation Measure 3.10-1, this impact would be less than significant.

Please also see the response to Comment I171-1. No further revisions to the analysis presented in the DEIR are necessary.

I171-7  The commenter believes that the proposed project is likely to cause significant erosion and sediment discharges to the river which would impact fish and associated aquatic life. The commenter recommends that if the project is approved, grading should be prohibited during the rainy season.

See Impact 3.10-1 (Potential Temporary, Short-Term Construction-Related Drainage and Water Quality Effects) in Section 3.10, “Hydrology and Water Quality,” of the DEIR. Activities conducted during the wet-weather season, defined as October 15 to June 1, would comply with aquatic conservation measures of the Humboldt Redwood Company Management Plan and logging practices outlined in the Forest Practices Act. A detailed description of these measures is provided in Mitigation Measure 3.10-1 (Implement Wet-Weather BMPs Consistent with the Humboldt Redwood Company Habitat Conservation Plan). Implementing Mitigation Measure 3.10-1 would protect water quality during wet-weather road construction would achieve consistency with the requirements of the Humboldt Redwood Company HCP, specifically those established to protect anadromous fish, by avoiding any potential for downstream sedimentation. The measures listed in Mitigation Measure 3.10-1 would allow the project to comply with
the management objectives of the Humboldt Redwood Company HCP and Impact 3.10-1 would be reduced to less-than-significant. No further revisions are necessary.

I171-8 The commenter expresses concern regarding wildfire danger associated with the project’s transmission lines.

Section 3.13, “Fire Protection Services and Wildfire Hazards,” of the DEIR provides information related to wildfire. Master Response 10, “Wildfire,” in this FEIR provides further discussion of the history of wildfire in the project region, regulatory requirements and mitigation measures that reduce the potential for wildfires.

I171-9 The commenter expresses the opinion that the DEIR is flawed because it did not address decommissioning of the project which must be considered in evaluation of cumulative impacts.

Project decommissioning is discussed in Section 2.5, “Project Decommissioning and Restoration,” in Chapter 2, “Project Description,” of the DEIR. As stated in Section 2.5, decommissioning would require a separate discretionary permit from the County and would require removal of the WTGs, cables, and other infrastructure support facilities. An environmental analysis of decommissioning would be conducted in support of the CEQA analysis for the decommissioning permit.

I171-10 The commenter indicates that the pending RCEA offshore wind energy project should have been addressed as an alternative to the proposed project.

The DEIR’s alternatives analysis meets the CEQA requirements. As stated in Chapter 6, “Alternatives,” of the DEIR, each alternative was evaluated according to the “rule of reason” and general feasibility criteria suggested by the State CEQA Guidelines Section 15126.6, as follows:

“The range of alternatives required in an EIR is governed by a ‘rule of reason’ that requires the EIR to set forth only those alternatives necessary to permit a reasoned choice. The alternatives shall be limited to ones that would avoid or substantially lessen any of the significant effects of the project. Of those alternatives, the EIR need examine in detail only the ones that the lead agency determines could feasibly attain most of the basic objectives of the project. The range of feasible alternatives shall be selected and discussed in a manner to foster meaningful public participation and informed decision making.”

The County has considered a range of alternatives that could feasibly attain most of the basic project objectives identified in Section 2.2.2, “Project Objectives,” of Chapter 2, “Project Description,” and avoid or substantially lessen one or more significant effects. Please also see Master Response 12, “Alternatives,” for further discussion.

I171-11 The commenter summaries their concerns identified in this comment letter, states that there are technical and legal flaws in the DEIR and recommends the No Project Alternative.

Please see the responses to Comments 171-1, 171-6, 171-7, and 171-10.
I172-1 The commenter indicates that they have worked on a spotted owl study for 25 years and expresses familiarity with their population dynamics, habitat, and the research being conducted on the impact of barred owls. The commenter expresses the opinion that barred owl management as mitigation for loss of spotted owl habitat may not be appropriate as a mitigation measure for the proposed project and recommends that barred owl management not be included as part of the project until receiving concurrence from USFWS.

Please see Master Response 4, “Northern Spotted Owl,” which describes northern spotted owl survey methodology, surveys conducted since circulation of the DEIR, analysis of impacts on activity centers, and refined mitigation measures. In addition, since circulation of the DEIR, the applicant has revised the gen-tie alignment to completely avoid all northern spotted owl activity centers and to avoid nesting and roosting habitat to the maximum extent possible. Barred owl management has been considered in the DEIR as a potential mitigation measure. However, implementation of such programs requires landowner permission and is not within the purview of the project applicant.

I172-2 The commenter expresses concern about potential impact to coastal prairie habitat and believes it should be protected, noting that the Wiyot Tribe have used this habitat as a cultural resource for a long time. The commenter also notes that the DEIR states that impacts on condors would be significant and unavoidable, but asks the project planners to consider the impacts on the ethnobotanical and cultural resources that the Wiyot have identified, and that the County should respect their comments and recommendations.

Please also see the response to Comment I65-1 regarding California condors. Please also refer to the response to comment letter T2 for specific responses to comments submitted by the Wiyot Tribe regarding ethnobotanical and other resources of importance to the tribe.
1173-1  *The commenter expresses the opinion that the DEIR is incomplete and has many flaws and that piecemealing makes it difficult to understand exactly what the impacts will be. The commenter states that all the people they have contacted are against the project. The commenter believes that flaws include that lack of a fire services financing plan, a fall rescue plan, plant management, and a fire danger analysis.*

The commenter expresses the opinion that the DEIR is piecemealed but does not provide any examples to support this opinion.

Section 3.13, “Fire Protection Services and Wildfire Hazards,” of the DEIR provides an analysis of wildfire impacts and Master Response 10, “Wildfire,” of this FEIR provides further discussion of the history of wildfire in the region and regulatory requirements and mitigation measures that reduce the potential for wildfires. Please also see Mitigation Measure 3.13-1b (Prepare and Implement a Fall Protection and Rescue Plan) in Section 3.13., “Wildfire,” of the DEIR.

1173-2  *The commenter believes that the wildlife studies are incomplete and wonders if the reference to condors as an “experimental species” is an attempt to avoid protecting the species.*

As described in Section 3.5, “Biological Resources,” the DEIR has provided a complete and thorough evaluation of all potentially affect wildlife species and committed the County to the required mitigation measures, has presented clear performance standards that have been further refined in this FEIR, and has described the means of mitigating impacts that would achieve the performance standards. Please also see Master Responses 2 through 8 for additional detail related to the analysis of impacts on biological resources, a discussion of additional surveys conducted since circulation of the DEIR, and additional refinements to the mitigation measures in the DEIR. Please also see the response to Comment I65-1 regarding California condors.

In addition, the project applicant has refined the footprint of the proposed project to avoid or minimize impacts on sensitive resources since circulation of the DEIR. Please see Master Response 1, “Site Planning and Avoidance Measures” and “Refinements to the Project Description Since Circulation of the DEIR” in Chapter 1 of this FEIR for the specific refinements that have been made to the project description since circulation of the DEIR.

1173-3  *The commenter states alternative energy sources were not explored and expresses the opinion that wind turbines destroy wild areas and property values. The commenter expresses the opinion that Humboldt County has nothing to gain by approving the project, particularly when the energy generated would be sold on the open market.*

The commenter expresses opposition to the proposed project. This comment does not raise specific questions or request information that pertains to the adequacy of the DEIR for addressing adverse physical impacts associated with the project. This comment is published in this Response to Comments document for public disclosure and for decision maker consideration. In addition, this DEIR is not
intended to address social or economic impacts. “An economic or social change by itself shall not be considered a significant effect on the environment” (CEQA Guidelines Sections 15131 and 15382).

Please also see Master Response 11, “Alternatives.”
The commenter opposes the proposed project and expresses the opinion that two overpasses to transport materials will change the area and that the project would cause visual blight and destroy pristine views.

The commenter expresses opposition to the proposed project. This comment does not raise specific questions or request information that pertains to the adequacy of the DEIR for addressing adverse physical impacts associated with the project. This comment is published in this Response to Comments document for public disclosure and for decision maker consideration. Please also see the response to Comments R3-8, R3-9, R3-10, R3-18, and I12-1, which address views of the project site.

In addition, Section 3.12, “Transportation and Traffic,” in the DEIR analyzes the proposed project impacts on traffic, including specific impacts during construction. A construction traffic management plan must be prepared as a condition of the project. That plan would identify haul routes, construction worker traffic patterns, and detour routes for implementation during transportation of heavy project components. Please note that neither new overpasses are proposed as part of the proposed project, nor will any existing overpasses be modified.
The commenter discusses electromagnetic fields and relates research done on the potential impact of electromagnetic fields from undersea cables on fish. The commenter states the opinion that the DEIR does not address the potential effect of high voltage crossings of the Eel River on listed salmonids and asks the County to support the no build alternative until permitting agencies address this issue.

CEQA does not require a lead agency to conduct every test or perform all research, study, and experimentation recommended or demanded by commenters. In reviewing draft EIRs, persons and public agencies should focus on the sufficiency of the document in identifying and analyzing the possible impacts on the environment and ways in which the significant effects of the project might be avoided or mitigated (CEQA Guidelines Section 15204).

An EIR is not inadequate simply because experts in a particular environmental subject matter dispute the conclusions reached by the experts whose studies were used in drafting the EIR, even where different conclusions can reasonably be drawn from a single pool of information. (CEQA Guidelines Section 15151; Guide to the California Environmental Quality Act [CEQA] [Remy et al. 2007:499–500]; Greenebaum v. City of Los Angeles [1984] 153 Cal. App. 3d 391, 413.) Perfection is not required, but the EIR must be adequate, complete and a good faith effort at full disclosure (CEQA Guidelines Section 15151). The DEIR for the proposed project provides an adequate, complete and good faith effort at full disclosure of the physical environmental impacts and the conclusions are based upon substantial evidence in light of the whole record.

Please note that the project gen-tie line will not be in contact with the Eel River. The commenter does not state the specific nature in which any potential impacts would occur. No further revisions are necessary.
I176-1 The commenter expresses the opinion that seismic activity in the area would require individual engineering and subsurface investigations for each turbine.

Please see the response to Comment I171-6 regarding seismicity and engineering.

I176-2 The commenter believes that permitting the decommissioning of the project separately is irresponsible because those environmental impacts should be considered in the DEIR for it to be a viable environmental impact report.

Please see the responses to Comments I145-1, I149-3, I171-9, and I176-3, related to decommissioning of the proposed project.

I176-3 The commenter expresses the opinion that red flashing lights would substantially alter the nightscape and suggests consideration of radar that would illuminate the red lights only when aircraft are in the area.

Section 2.4.2, “Public Access and Safety,” of the DEIR addresses FAA requirements for lighting on the proposed turbines. Through its Notice of Proposed Construction or Alteration (Form 7460.1), the FAA would conduct a review of the proposed project before construction begins (Title 14, Part 77 of the Code of Federal Regulations). The turbines proposed under all generation options would be more than 200 feet tall and therefore would require appropriate obstruction lighting. However, the FAA may determine that the absence of marking and/or lighting would not threaten aviation. As a result of its review process, the FAA might recommend installing tower markings or aviation safety lighting on all or only a portion of the turbine towers.

I176-4 The commenter expresses the opinion that the amount of lumber removed to clear the turbine sites, existing changes to Jordan Creek Road, and the high voltage lines from Highway 101 to Bridgeville has not been identified.

The project description in the DEIR includes all elements of the proposed project. Since circulation of the DEIR, the project applicant has refined the footprint of the proposed project to avoid or minimize impacts on sensitive resources since circulation of the DEIR. Please see Master Response 1, “Site Planning and Avoidance Measures” and “Refinements to the Project Description Since Circulation of the DEIR” in Chapter 1 of this FEIR for the specific refinements that have been made to the project description since circulation of the DEIR. The environmental analysis in the DEIR includes all elements of the project, including timber harvest at the turbine site and gen-tie construction to Bridgeville. No changes to Jordan Creek Road are proposed as part of the project.

I176-5 The commenter believes the area of the road connection at Depot Road in Fields Landing is a wetland and the work would require permits from the California Coastal Commission.

Please refer to the response to comment letter S5 for specific responses submitted by the California Coastal Commission. The commenter is correct about the location of a wetland at the intersection. A
wetland delineation has been completed by the project applicant, and a coastal development permit will be obtained.

1176-6  The commenter feels that maintenance of the gen-tie corridor hasn’t been addressed and is concerned about creating potential fire hazards.

Section 3.13, “Fire Protection Services and Wildfire Hazards,” of the DEIR provides information related to wildfire and Master Response 10, “Wildfire,” in this FEIR provides further discussion of the history of wildfire in the region and regulatory requirements and mitigation measures that reduce the potential for wildfires.

1176-7  The commenter believes grading and excavation should follow NPDES guidelines for wet weather construction.

See Impact 3.10-1 (Potential Temporary, Short-Term Construction-Related Drainage and Water Quality Effects) in Section 3.10, “Hydrology and Water Quality,” of the DEIR. Project-related grading activity is subject to the requirements outlined in a Section 401 water quality certification and an SWRCB statewide NPDES stormwater permit for general construction activity (Water Quality Order 2009-0009-DWQ). Please also see the response to Comment 171-7.

1176-8. The commenter expresses opinions regarding noise levels associated with project traffic on the roadways.

Please see the responses to Comments I121-1 and I123-1, which address noise and vibration.

1176-9  The commenter believes, based on previous EIRs for other proposed projects in the County, that the work put into the current application appears inadequate.

The County believes that an adequate evaluation of resources has been done. The DEIR addresses the full suite of environmental impacts resulting from implementation of the proposed project. Please see Sections 3.2, “Aesthetics”; 3.3, “Agricultural and Forestry Resources”; 3.4, “Air Quality”; 3.5, “Biological Resources”; 3.7, “Geology and Soils”; 3.8, “Greenhouse Gas Emissions”; 3.9, “Hazards and Hazardous Materials”; 3.10, “Hydrology and Water Quality”; 3.11, “Noise”; and 3.12, “Transportation and Traffic” in the DEIR for an analysis of the project’s impact on these resources, and for specific mitigation measures related to impacts on these resources. Numerous technical studies were prepared and relied upon during preparation of the DEIR. Additional technical studies completed since circulation of the DEIR are included in Appendix B of this FEIR.
The commenter believes the proposed project would cause excessive impacts to the environment and expresses concern over clear cutting.

This comment does not raise specific questions or request information that pertains to the adequacy of the DEIR for addressing adverse physical impacts associated with the project. This comment is published in this Response to Comments document for public disclosure and for decision maker consideration. No further response is required.
1178-1 The commenter, writing on behalf of the membership of Californians for Alternatives to Toxics (CATs), notes that the DEIR describes herbicide use to maintain infrastructure and the use of 500 gallons of oil in each turbine. The commenter expresses the opinion that chemicals used to operate heavy equipment could result in leakage and spills.

As discussed in Impact 3.9-1 (Accidental Spills of Hazardous Materials from Routine Transport, Use, or Disposal of Hazardous Materials) in Section 3.9, “Hazards and Hazardous Materials,” of the DEIR, construction and operation of the proposed project are required by law to implement and comply with existing hazardous material regulations. Each of these regulations is specifically designed to protect the public health through improved procedures for the handling of hazardous materials, better technology in the equipment used to transport these materials, and a more coordinated quicker response to emergencies. With incorporation of existing regulations, impacts related to the creation of significant hazards to the public through routine, transport, use, disposal, and risk of upset is considered less than significant. Any herbicides use by the proposed project would be in compliance with state and local regulations. No further response is necessary.

1178-2 The commenter indicates that they did not find any analyses of reasonably foreseeable impacts of many aspects of the project in the DEIR and believes that the project description is incomplete.

Pursuant to CEQA Guidelines, an EIR project description should contain the location and boundaries of the proposed project by way of a map; a description of the project's technical, economic, and environmental characteristics; and a statement briefly describing the intended use of the EIR (CEQA Guidelines Section 15124[a]-[d]). The project description “should not supply extensive detail beyond that needed for evaluation and review of the environmental impact” (CEQA Guidelines Section 15124). A general conceptual discussion of the main features of the project is sufficient (CEQA Guidelines Section 15124[a], [c]; Dry Creek Citizens Coalition v. County of Tulare, 70 Cal. App. 4th 20, 27-28 [1999]).

Chapter 2, “Project Description,” of the DEIR project description contains detailed text and exhibits to illustrate the proposed project location; proposed project objectives, a summary of the project’s components, construction and phasing, project operations and maintenance, and project decommissioning. Please also see “Refinements to the Project Description” in Chapter 1 of this FEIR for specific refinements to the project description since circulation of the DEIR and Appendix C of this FEIR for updated project maps that reflect these refinements.

The County believes that an adequate evaluation of resources has been done. The DEIR addresses the full suite of environmental impacts resulting from implementation of the proposed project. Please see Sections 3.2, “Aesthetics”; 3.3, “Agricultural and Forestry Resources”; 3.4, “Air Quality”; 3.5, “Biological Resources”; 3.7, “Geology and Soils”; 3.8, “Greenhouse Gas Emissions”; 3.9, “Hazards and Hazardous Materials”; 3.10, “Hydrology and Water Quality”; 3.11, “Noise”; and 3.12, “Transportation and Traffic” in the DEIR for an analysis of the project’s impact on these resources, and for specific mitigation measures related to impacts on these resources. Numerous technical studies were prepared and relied
upon during preparation of the DEIR. Additional technical studies completed since circulation of the DEIR are included in Appendix B of this FEIR.

I178-3 The commenter states that CATs was a plaintiff in a lawsuit in which an EIR was rejected on the grounds that it included environmental commitments as part of the project description without fully analyzing the impacts prior to inclusion of these measures.

Mitigation measures may specify performance standards which would mitigate the significant effect of the project and which may be accomplished in more than one specified way. The specific details of a mitigation measure, however, may be developed after project approval when it is impractical or infeasible to include those details during the project’s environmental review provided that the agency (1) commits itself to the mitigation, (2) adopts specific performance standards the mitigation will achieve, and (3) identifies the type(s) of potential action(s) that can feasibly achieve that performance standard and that will considered, analyzed, and potentially incorporated in the mitigation measure. Compliance with a regulatory permit or other similar process may be identified as mitigation if compliance would result in implementation of measures that would be reasonably expected, based on substantial evidence in the record, to reduce the significant impact to the specified performance standards (Guidelines Section 15126.4).

The specific design of the mitigation can be permissibly deferred where mitigation is known to be feasible, but practical considerations prevent a lead agency from establishing specific standards early in the development process. Such deferral of the specific design of mitigation is permissible when the lead agency commits itself to devising mitigation measures that will satisfy specific performance standards for evaluating the efficacy of the measures and the project implementation is contingent upon the mitigation measures being in place (Oakland Heritage Alliance v. City of Oakland (2011) 195 Cal.App.4th 884; Poet, LLC v. California Air Resources Board (2013) 217 Cal.App.4th 1214; Sacramento Old City Association v. City Council (1991) Cal.App.3d 1011, 1028-1029).

The DEIR includes a comprehensive set of mitigation measures. Several of these measures have been further refined in this FEIR (See Master Responses 2 through 6), but none of the measures are included in the project description. No further revisions are necessary.

I178-4 The commenter believes that much of the DEIR relies too heavily on regulatory guidelines and commitments to future analyses and thus fails to address and disclose potential impacts. The commenter focuses on potential effects associated with placement of the turbines with their footings on the Franciscan Complex, a particularly heterogeneous and unpredictable formation, coupled with frequent seismic activity. The commenter expresses the opinion that failure is likely but states that the DEIR doesn’t analyze the potential for failure or the likely impacts, and consequently the DEIR isn’t valid, not transparent and is of uncertain validity. The commenter also questions the project’s consistency with the County General Plan, particularly with respect to effects related to seismic activity.

Please see the response to Comment 171-6 regarding seismicity and engineering and the response to Comment I178-3.

I178-5 The commenter expresses the opinion that the determination in the DEIR impacts associated with seismic activity would be less than significant is based on what the commenter refers to as deferred analysis. The
commenter further believes that the DEIR depends on regulatory processes and systems to avoid analysis of the impacts in the EIR and that investigations intended to provide critical information regarding impacts are deferred.

Please see the response to Comment 171-6 regarding seismicity and engineering and the response to Comment 1178-3.
The commenter suggests considering local options to produce large volumes of renewable electricity and examine their potential effects. The commenter discusses a single possibility of rooftop solar.

The commenter expresses opposition to the proposed project. This comment does not raise specific questions or request information that pertains to the adequacy of the DEIR for addressing adverse physical impacts associated with the project. This comment is published in this Response to Comments document for public disclosure and for decision maker consideration. In addition, this DEIR is not intended to address social or economic impacts. “An economic or social change by itself shall not be considered a significant effect on the environment” (CEQA Guidelines Sections 15131 and 15382).
The commenter states opposition to any wind energy project in the area and expresses the opinion that there are plenty of other locations that would have much less environmental effects and notes that this position is purely emotional.

The commenter expresses opposition to the proposed project. This comment does not raise specific questions or request information that pertains to the adequacy of the DEIR for addressing adverse physical impacts associated with the project. This comment is published in this Response to Comments document for public disclosure and for decision maker consideration. No further response is required.
The commenter is concerned about the impact that the turbine footings would have on the water source to Howe Creek a tributary to the Eel River, from which all the commenter’s water comes.

Turbine foundations will be built on top of Bear River Ridge and Monument Ridge after completion of appropriate geotechnical assessments and in compliance with all applicable regulations. The commenter does not provide details on the nature of the specific concern and does not provide evidence of how alleged impacts on Howe Creek would occur. No further response is necessary.
The commenter recommends that the Schatz Energy Research Center at HSU be involved in study of the proposed project and expresses support for the proposed project.

The County appreciates the commenter’s recommendation. This comment does not raise specific questions or request information that pertains to the adequacy of the DEIR for addressing adverse physical impacts associated with the project, nor does it contain an argument raising significant environmental issues. This comment is published in this Response to Comments document for public disclosure and for decision maker consideration. No further response is required.
The commenter lists concerns regarding climate change but states the belief that 30 years of clean energy are worth some negative impacts and the project should be built.

The commenter’s support for the project is noted. This comment does not raise specific questions or request information that pertains to the adequacy of the DEIR for addressing adverse physical impacts associated with the project. This comment is published in this Response to Comments document for public disclosure and for decision maker consideration. No further response is required.
The commenter opposes the proposed project, expressing the opinion that there are numerous areas of concern, including construction methods and materials, and ongoing environmental and economic damage.

The comment does not raise specific questions or request information that pertains to the adequacy of the DEIR for addressing adverse physical impacts associated with the project. This comment is published in this Response to Comments document for public disclosure and for decision maker consideration. No further response is required.
1185-1 The commenter opposes the proposed project and expresses the opinion that the proposed location is not appropriate. The commenter believes that the scope is too large, the turbines are too tall and that the turbine footings would disrupt habitat. The commenter further states the opinions that birds and bats would be adversely affected, and that the project would increase fire danger. The commenter also expresses the opinion that proposed roads in sensitive areas should not be permitted and that few county residents would benefit from the project.

Rocks and WTG pads have been designed and micro-sited to minimize effects on biological resources. As described in Section 3.5, “Biological Resources,” the DEIR has provided a complete and thorough evaluation of all potentially affect wildlife species and committed the County to the required mitigation measures, has presented clear performance standards that have been further refined in this FEIR, and has described the means of mitigating impacts that would achieve the performance standards. Please also see Master Responses 2 through 8 for additional detail related to the analysis of impacts on biological resources, a discussion on additional surveys conducted since circulation of the DEIR, and additional refinements to the mitigation measures in the DEIR.

Section 3.13, “Fire Protection Services and Wildfire Hazards,” of the DEIR provides an analysis of wildfire impacts and Master Response 10, “Wildfire,” in this FEIR provides further discussion of the history of wildfire in the region and regulatory requirements and mitigation measures that reduce the potential for wildfires.

Proposed roads have been thoroughly analyzed in the DEIR, and care has been taken to distinguish between temporary impacts that would occur during construction when roads are constructed or widened to allow transport of construction equipment and WTG components, and permanent impacts that comprise the project footprint after construction and reclamation of temporarily disturbed area. DEIR Section 2.4.1, “Operations and Maintenance Plan” also notes that after construction of the project, permanent access roads would be returned to HRC for their use as timberland access roads and HRC would be responsible for maintenance. Upon decommissioning, project access roads would be removed, and the area restored to pre-project condition.

In addition, the project applicant has refined the footprint of the proposed project to avoid or minimize impacts on sensitive resources since circulation of the DEIR. Please see Master Response 1, “Site Planning and Avoidance Measures,” and “Refinements to the Project Description since Circulation of the DEIR” in Chapter 1 of this FEIR for details.

The commenter expresses the opinion that the proposed project would not benefit the residents of Humboldt County. This comment does not raise specific questions or request information that pertains to the adequacy of the DEIR for addressing adverse physical impacts associated with the project. This comment is published in this Response to Comments document for public disclosure and for decision maker consideration. In addition, neither the DEIR nor this FEIR is not intended to address social or economic impacts. “An economic or social change by itself shall not be considered a significant effect on the environment” (CEQA Guidelines Sections 15131 and 15382).
The commenter, also representing Forests Forever, opposes the proposed project, expressing concerns regarding the size, impact, location and precedent of the proposed project. The commenter further expresses the opinion that the DEIR does not adequately address adverse impacts of the project and draws attention to comments on the document by the Towns of Scotia and Rio Dell, the Siskiyou Land Conservancy, and the Lost Coast League.

The County believes that an adequate evaluation of impacts on all resources potentially affected by the proposed project has been completed. The DEIR addresses the full suite of environmental impacts resulting from implementation of the proposed project. Please see Sections 3.2, “Aesthetics”; 3.3, “Agricultural and Forestry Resources”; 3.4, “Air Quality”; 3.5, “Biological Resources”; 3.7, “Geology and Soils”; 3.8, “Greenhouse Gas Emissions”; 3.9, “Hazards and Hazardous Materials”; 3.10, “Hydrology and Water Quality”; 3.11, “Noise”; and 3.12, “Transportation and Traffic” in the DEIR for an analysis of the project’s impact on these resources, and for specific mitigation measures related to impacts on these resources. Numerous technical studies were prepared and relied upon during preparation of the DEIR. Additional technical studies completed since circulation of the DEIR are included in Appendix B of this FEIR.

Please refer to the responses to comment letters R1 (City of Rio Dell), R3 (Town of Scotia), O3 (Lost Coast League), and O8 (Siskiyou Land Conservancy) for specific responses submitted by those agencies and organizations cited by the commenter.
I187-1 The commenter is opposed to the proposed project for a variety of environmental and socioeconomic reasons. The commenter expresses the opinion that the endangered marbled murrelet and several California fully protected species would be in danger of being killed as a result of the project. The commenter also states the opinion that owl surveys were inadequate. The commenter further states the belief that the ridges are sacred areas to the Wiyot and Bear River tribes and that there are concerns regarding impacts from the turbine footings, underground transmission lines and road construction’s effect local water sources. The commenter also expresses opinions regarding the lack of a Timber Harvest Plan, increased fire risk, transportation of turbine components, vegetation removal, lack of seismic testing, turbine maintenance and other issues.

As described in Section 3.5, “Biological Resources,” the DEIR has provided a complete and thorough evaluation of all potentially affect wildlife species and committed the County to the required mitigation measures, has presented clear performance standards that have been further refined in this FEIR, and has described the means of mitigating impacts that would achieve the performance standards. Please also see Master Responses 2 through 8 for additional detail related to the analysis of impacts on biological resources, a discussion on additional surveys conducted since circulation of the DEIR, and additional refinements to the mitigation measures in the DEIR.

Section 3.13, “Fire Protection Services and Wildfire Hazards,” of the DEIR provides an analysis of wildfire impacts and Master Response 10, “Wildfire,” in this FEIR provides further discussion of the history of wildfire in the region and regulatory requirements and mitigation measures that reduce the potential for wildfires.

Please see the responses to Comments I121-1 and I123-1, which address noise and vibration. Please see the response to Comment I149-1, which addresses FAA lighting requirements. Please see the response to Comment I171-6 regarding seismicity. Please also refer to the response to comment letter T2 for specific responses to comments submitted by the Wiyot Tribe.

Section 3.12, “Transportation and Traffic” in the DEIR analyzes the proposed project impacts on traffic, including specific impacts to Highway 101 during construction. A construction traffic management plan must be prepared as a condition of the project. That plan would identify haul routes, construction worker traffic patterns, and detour routes for implementation during transportation of heavy project components.

Project operations and maintenance is discussed in Section 2.4, “Operations and Maintenance Activities,” and project decommissioning is discussed in Section 2.5, “Project Decommissioning and Restoration,” in Chapter 2, “Project Description,” of the DEIR.

The commenter expresses an opinion regarding tax credits. The DEIR is not intended to address social or economic impacts. “An economic or social change by itself shall not be considered a significant effect on the environment” (CEQA Guidelines Sections 15131 and 15382).
The commenter believes that the DEIR has been presented prematurely because much of the work to ensure the project is not environmentally dangerous has not been completed and states the opinion that the applicant hasn’t addressed multiple serious issues in the DEIR.

The County believes that an adequate evaluation of impacts on all resources potentially affected by the proposed project has been completed. The DEIR addresses the full suite of environmental impacts resulting from implementation of the proposed project. Please see Sections 3.2, “Aesthetics”; 3.3, “Agricultural and Forestry Resources”; 3.4, “Air Quality”; 3.5, “Biological Resources”; 3.7, “Geology and Soils”; 3.8, “Greenhouse Gas Emissions”; 3.9, “Hazards and Hazardous Materials”; 3.10, “Hydrology and Water Quality”; 3.11, “Noise”; and 3.12, “Transportation and Traffic” in the DEIR for an analysis of the project’s impact on these resources, and for specific mitigation measures related to impacts on these resources. Numerous technical studies were prepared and relied upon during preparation of the DEIR. Additional technical studies completed since circulation of the DEIR are included in Appendix B of this FEIR.

Please see Master Response 1, “Site Planning and Avoidance Measures” for further information on the history and siting of the proposed project. In addition, the project applicant has refined the footprint of the proposed project to avoid or minimize impacts on sensitive resources since circulation of the DEIR; please see “Refinements to the Project Description since Circulation of the DEIR” in Chapter 1 of this FEIR for details.

Please see the response to Comment I25-1 for a summary of how the County and the applicant have provided opportunities for public comment.

The commenter states the opinion that the proposed project is located on or near an earthquake fault line which poses an environmental threat and suggests moving the wind turbine project elsewhere.

Figure 3.7-2 in Section 3.7, “Geology and Soils,” of the DEIR shows the locations of active faults in the project region. As discussed in Impact 3.7-1 (Surface Rupture Along a Known Earthquake Fault) in Section 3.7 of the DEIR, although known faults would be in the vicinity of the wind turbines, they are not considered active (i.e., no evidence of fault movement within the last 11,000 years), and therefore have a low potential for surface fault rupture. Location of the O&M facility within an Alquist-Priolo Earthquake Fault Zone would be designed and constructed in accordance with the seismic design requirements of the 2016 CBC and Alquist-Priolo Fault Hazard regulations. The CBC standards require the design of structures to consider seismic hazards present at the site and the intended use, or nature of occupancy, of the structure. Because compliance with the Alquist-Priolo Act would be enforced, preventing construction of structures intended for human occupancy over the surface traces of faults that are designated as active by the California Geological Survey, the impact from surface fault rupture would be less than significant. No revisions are required.

Please also see the response to Comment I171-6 regarding strong seismic ground shaking.
The commenter expresses the opinion that there isn’t an adequate mitigation plan for light pollution and that the public should review the lighting plan after it has been approved by the FAA.

Please see the responses to Comments R3-8, R3-9, R3-10, R3-18, and I149-1, which address visual impacts and FAA lighting requirements.

The commenter is concerned about water quality impacts and the cost of water in Scotia and expresses the opinion that there isn’t an adequate mitigation plan and states the opinion that a plan for emergency fire water needs to be prepared for public review.

Water use is discussed in Section 3.1.3, “Utilities,” of Chapter 3, “Environmental Setting, Impacts, and Mitigation Measures,” of the DEIR. Please also see the response to Letter S4, which addresses comments provided by the Scotia CSD.

Please see the responses to Comments I171-6 and I171-7, which address erosion and sediment discharge and erosion control.

The commenter believes that there isn’t an adequate mitigation plan to address noise pollution associated with the project.

Please see the responses to Comments I121-1 and I123-1, which address noise.

The commenter requests a transportation mitigation plan be prepared to address traffic and associated carbon emissions.

As discussed in Section 3.12, “Transportation and Traffic,” in the DEIR, a construction traffic management plan must be prepared as a condition of the project. That plan would identify haul routes, construction worker traffic patterns, and detour routes for implementation during transportation of heavy project components.

The commenter states that County roads are in bad shape and expresses the opinion that there isn’t an adequate mitigation plan addressing impacts to roads.

Mitigation Measure 3.12-1 (Rehabilitate/Reconstruct County-Maintained Roads Damaged by Truck Traffic) in Section 3.12, “Transportation and Traffic,” of the DEIR requires that at the conclusion of the project, the project applicant and the County Department of Public Works shall reassess all roads used by project-related truck traffic and that the applicant shall rehabilitate/reconstruct the roads to the satisfaction of the County Department of Public Works. No revisions are necessary.

The commenter indicates that fire is an extremely serious threat in Scotia and there is no fire services financing plan or fire safety management plan addressing fire risks in the DEIR.

Mitigation Measure 3.13-1a (Prepare and Implement a Fire Services Financing Plan) in Section 3.13, “Fire Protection Services and Wildfire Hazards,” of the DEIR requires the project applicant to develop and implement a fire services financing plan in consultation with the Humboldt County Fire Chiefs’ Association and Rio Dell Fire Protection District. In addition, Mitigation Measure 3.13-2a (Prepare and Implement a Fire Safety and Management Plan to Minimize the Potential for Wildland Fires) requires the project applicant to prepare and implement a fire protection plan.
Please also see Master Response 10, “Wildfire,” of this FEIR provides further discussion of mitigation measures that reduce the potential for wildfires.
This is a copy of comment letter O16 provided by the Redwood Region Audubon Society.

Please see the responses to the comments in letter O16 (from the Redwood Region Audubon Society).
I190-1  The commenter is opposed to the proposed project and expresses opinion that the project would change the wildlife and landscape of the County. The commenter also states the belief that widening Jordan Road and opening up new areas with new roads could lead to future development that could result in sedimentation to waterways. The commenter expresses the belief that clearing land for the transmission line would be destructive to wildlife, detrimental to the tourism industry, and a fire hazard. The commenter also states a preference for solar energy.

As described in Section 3.5, “Biological Resources,” the DEIR has provided a complete and thorough evaluation of all potentially affect wildlife species and committed the County to the required mitigation measures, has presented clear performance standards that have been further refined in this FEIR, and has described the means of mitigating impacts that would achieve the performance standards. Please also see Master Responses 2 through 8 for additional detail related to the analysis of impacts on biological resources, a discussion on additional surveys conducted since circulation of the DEIR, and additional refinements to the mitigation measures in the DEIR.

Please see the responses to Comments I171-6 and I171-7 address erosion and sediment discharge and erosion control. Section 3.13, “Fire Protection Services and Wildfire Hazards,” of the DEIR provides an analysis of wildfire impacts and Master Response 10, “Wildfire,” in this FEIR provides further discussion of the history of wildfire in the region and regulatory requirements and mitigation measures that reduce the potential for wildfires.

The commenter expresses their preference for solar energy. This comment does not raise specific questions or request information that pertains to the adequacy of the DEIR for addressing adverse physical impacts associated with the project. This comment is published in this Response to Comments document for public disclosure and for decision maker consideration.
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<th>Letter 1191 Response</th>
<th>Anita Horner</th>
<th>June 7, 2019</th>
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1191-1 *This is a duplicate of comment letter 1113.*

Please see the responses to Comments 1113-1 to 1113-4.
The commenter provides a letter essentially the same as Form Letter A. In one additional paragraph, the commenter expresses the opinion that protection of biodiversity is not secondary to emissions concerns, but the protection of biodiversity is an imperative for an effective response to climate change.

Please see Chapter 8b of this FEIR which contains the response to Form Letter A comments.

The commenter expresses an opinion regarding biodiversity. This comment does not raise specific questions or request information that pertains to the adequacy of the DEIR for addressing adverse physical impacts associated with the project. This comment is published in this Response to Comments document for public disclosure and for decision maker consideration.
I193-1 The commenters oppose the proposed project and state the belief that the proposed site for the Humboldt Wind Energy Project is inappropriate, expressing concerns regarding fire risks, contamination of the Eel River during drilling, collision risks to condors, negative impacts on tribal land important to the Wiyot Tribe, and potential earthquake risks. The commenters also express the opinion that the proposed project appears to have been fast-tracked without sufficient environmental review and significant risk mitigation requirements.

Section 3.13, “Fire Protection Services and Wildfire Hazards,” of the DEIR provides an analysis of wildfire impacts and Master Response 10, “Wildfire,” in this FEIR provides further discussion of the history of wildfire in the region and regulatory requirements and mitigation measures that reduce the potential for wildfires. Regarding concerns about condors, please see the response to Comment I65-1. Please see the responses to Comments I171-6 and I171-7, which address erosion and sediment discharge during construction. Please also see the responses to Comments I171-6 and I188-2 regarding strong seismic ground shaking and earthquake risks. Please also refer to the response to comment letter T2 for specific responses to comments submitted by the Wiyot Tribe.

Please also see Master Response 1, “Site Planning and Avoidance Measures,” for further information on the history and siting of the proposed project. In addition, the project applicant has refined the footprint of the proposed project to avoid or minimize impacts on sensitive resources since circulation of the DEIR. “Refinements to the Project Description since Circulation of the DEIR” in Chapter 1 of this FEIR for details.

Please see the response to Comment I25-1 for a summary of how the County and the applicant have provided opportunities for public comment.
1194-1 The commenter opposes the proposed project and states the belief that the adverse impacts of the proposed project would outweigh expected benefits.

This comment does not raise specific questions or request information that pertains to the adequacy of the DEIR for addressing adverse physical impacts associated with the project. This comment is published in this Response to Comments document for public disclosure and for decision maker consideration. No further response is required.
The commenter opposes the proposed project and believes that the project would do irreversible damage to native grasslands, wildlife and watershed. The commenter expresses the opinion that the DEIR is incomplete and that there are issues that need to be resolved such as water use for the concrete, effects of the weight of the turbine foundations, and effects on deciduous species. The commenter states that the proposed project is being rushed by the County and asks if the County will be collecting revenue.

The County believes that an adequate evaluation of impacts on all resources potentially affected by the proposed project has been completed. The DEIR addresses the full suite of environmental impacts resulting from implementation of the proposed project. Please see Sections 3.2, “Aesthetics”; 3.3, “Agricultural and Forestry Resources”; 3.4, “Air Quality”; 3.5, “Biological Resources”; 3.7, “Geology and Soils”; 3.8, “Greenhouse Gas Emissions”; 3.9, “Hazards and Hazardous Materials”; 3.10, “Hydrology and Water Quality”; 3.11, “Noise”; and 3.12, “Transportation and Traffic” in the DEIR for an analysis of the project’s impact on these resources, and for specific mitigation measures related to impacts on these resources. Numerous technical studies were prepared and relied upon during preparation of the DEIR. Additional technical studies completed since circulation of the DEIR are included in Appendix B of this FEIR.

Please see Master Response 1, “Site Planning and Avoidance Measures” for further information on the history and siting of the proposed project. In addition, the project applicant has refined the footprint of the proposed project to avoid or minimize impacts on sensitive resources since circulation of the DEIR. Please see “Refinements to the Project Description since Circulation of the DEIR” in Chapter 1 of this FEIR for details.

The commenter asks a question regarding revenue. This DEIR is not intended to address social or economic impacts. “An economic or social change by itself shall not be considered a significant effect on the environment” (CEQA Guidelines Sections 15131 and 15382).
1196-1  The commenter believes that the comment period should be longer and that the project is being rushed through the review process. The commenter further expresses the opinion that the project is not carbon neutral and will consume a large amount of energy during construction and operation. The commenter also states the belief that the County will not benefit from the project because the energy produced will be distributed to other counties in California and expresses opinions regarding tourism effects, water use, Native American values, and adverse effects on marbled murrelets and other species.

As described in Section 3.5, “Biological Resources,” the DEIR has provided a complete and thorough evaluation of all potentially affect wildlife species and committed the County to the required mitigation measures, has presented clear performance standards that have been further refined in this FEIR, and has described the means of mitigating impacts that would achieve the performance standards. Please also see Master Response 2, “Marbled Murrelet,” which provides updated marbled murrelet survey results and additional information on the proposed mitigation measures for marbled murrelets. Please also see Master Responses 3 through 8 for additional detail related to the analysis of impacts on biological resources, a discussion on additional surveys conducted since circulation of the DEIR, and additional refinements to the mitigation measures in the DEIR.

Any damage sustained to Highway 101 as a result of the project would be repaired in compliance with the mitigation presented in the DEIR. No further revisions are necessary. Please also see the response to Comment I65-1 regarding California condors. Please see the responses to Comments I121-1 and I123-1, which address noise and vibration. Please see Responses to Comment I21-1 regarding energy generation and distribution. Please also refer to the response to comment letter T1 for specific responses to comments submitted by the Yurok Tribe.

Please see Section 3.8 “Greenhouse Gas Emissions,” of the DEIR for an analysis of greenhouse gases and Master Response 9, “Adequacy of the Greenhouse Gas Analysis,” of the FEIR for additional in-depth information regarding the adequacy of the greenhouse gas analysis and results of additional modelling completed to substantiate the findings presented in the DEIR.

The commenter expresses their preference for solar energy. This comment does not raise specific questions or request information that pertains to the adequacy of the DEIR for addressing adverse physical impacts associated with the project. This comment is published in this Response to Comments document for public disclosure and for decision maker consideration.
I197-1  The commenter, although not opposed to wind power in general, opposes the proposed project and expresses the opinion that wind turbines are known to spontaneously combust, that clearing so many trees that sequester carbon does not make sense, and more study is needed. The commenter also expresses concern about the effects on wildlife and that an earthquake will occur which the turbines could not survive.

The County believes that an adequate evaluation of impacts on all resources has been completed. The DEIR addresses the full suite of environmental impacts resulting from implementation of the proposed project. Please see Sections 3.2, “Aesthetics”; 3.3, “Agricultural and Forestry Resources”; 3.4, “Air Quality”; 3.5, “Biological Resources”; 3.7, “Geology and Soils”; 3.8, “Greenhouse Gas Emissions”; 3.9, “Hazards and Hazardous Materials”; 3.10, “Hydrology and Water Quality”; 3.11, “Noise”; and 3.12, “Transportation and Traffic” in the DEIR for an analysis of the project’s impact on these resources, and for specific mitigation measures related to impacts on these resources.

Please also see the responses to Comments I171-6 and I188-2 regarding earthquake risks.

Please see Master Response 9, “Adequacy of the Greenhouse Gas Analysis,” for additional in-depth information regarding the adequacy of the greenhouse gas analysis, including an analysis of carbon sequestration, and results of additional modeling completed to substantiate the findings presented in the DEIR.

Since the publication of the DEIR, the applicant has proposed a reduction in the number of wind turbine generators from 60 to 47, spread across Monument Ridge and Bear River Ridge. Please also see Master Responses 2 through 8 for additional detail related to the analysis of impacts on biological resources, a discussion of additional surveys conducted since circulation of the DEIR, and additional refinements to the mitigation measures in the DEIR. Please see Master Response 1, “Site Planning and Avoidance Measures” and “Refinements to the Project Description since Circulation of the DEIR” in Chapter 1 of this FEIR for the specific refinements that have been made to the project description.

The commenter states that wind turbines have been known to spontaneously combust but does not provide any specific examples of where or how such spontaneous combustion of turbines has occurred. No further revisions to the DEIR are necessary.
The commenter is opposed to the proposed project and expresses the opinion that the project would harm wildlife and birds, would require fossil fuels and water to operate, cause constant audible and non-audible noise, require new roads and the removal of trees and grasslands. The commenter further states the opinion that the DEIR fails to take adequate measures to avoid, minimize, and compensate for the significant impacts of the project and that solar power is much more cost effective. The commenter also expresses the belief that the project approval is being rushed and that the public is not being properly informed or given ample time to study the DEIR.

The County believes that an adequate evaluation of impacts on all resources has been completed. The DEIR addresses the full suite of environmental impacts resulting from implementation of the proposed project. Please see Sections 3.2, “Aesthetics”; 3.3, “Agricultural and Forestry Resources”; 3.4, “Air Quality”; 3.5, “Biological Resources”; 3.7, “Geology and Soils”; 3.8, “Greenhouse Gas Emissions”; 3.9, “Hazards and Hazardous Materials”; 3.10, “Hydrology and Water Quality”; 3.11, “Noise”; and 3.12, “Transportation and Traffic” in the DEIR for an analysis of the project’s impact on these resources, and for specific mitigation measures related to impacts on these resources.

Please see Master Response 1, “Site Planning and Avoidance Measures,” for further information on the history and siting of the proposed project. Please also see the response to Comment I25-1 for a summary of how the County and the applicant have provided opportunities for public comment.

The commenter expresses their preference for solar energy. This comment does not raise specific questions or request information that pertains to the adequacy of the DEIR for addressing adverse physical impacts associated with the project. This comment is published in this Response to Comments document for public disclosure and for decision maker consideration.
I199-1  *The commenter is opposed to the proposed project and appreciates the natural environment of Humboldt County.*

The commenter’s opposition to the project is noted. This comment does not raise specific questions or request information that pertains to the adequacy of the DEIR for addressing adverse physical impacts associated with the project. This comment is published in this Response to Comments document for public disclosure and for decision maker consideration. No further response is required.
The commenter, who works for the Schatz Energy Research Center, but indicates no involvement in the studies for the proposed project, expresses support for the project. The commenter states the opinion that use of the county’s wind resources through this project would allow the county to virtually eliminate the carbon impact from its electricity use. The commenter further expresses the opinion that the project would benefit the area economically.

The commenter’s support for the project is noted. This comment does not raise specific questions or request information that pertains to the adequacy of the DEIR for addressing adverse physical impacts associated with the project. This comment is published in this Response to Comments document for public disclosure and for decision maker consideration. No further response is required.
1201-1  *This is a copy of comment letter I172.*

Please see the response to Comment letter I172.
The commenter opposes the proposed project and states agreement with others’ concerns regarding effects on wildlife, wildfires, construction and maintenance.

The commenter expresses opposition to the proposed project. As described in Section 3.5, “Biological Resources,” the DEIR has provided a complete and thorough evaluation of all potentially affect wildlife species and committed the County to the required mitigation measures, has presented clear performance standards that have been further refined in this FEIR, and has described the means of mitigating impacts that would achieve the performance standards. Please also see Master Responses 2 through 8 for additional detail related to the analysis of impacts on biological resources, a discussion on additional surveys conducted since circulation of the DEIR, and additional refinements to the mitigation measures in the DEIR.

Section 3.13, “Fire Protection Services and Wildfire Hazards,” of the DEIR provides an analysis of wildfire impacts and Master Response 10, “Wildfire,” in this FEIR provides further discussion of the history of wildfire in the region and regulatory requirements and mitigation measures that reduce the potential for wildfires.

No further revisions are necessary.
1203-1 The commenter requests that the public comment period be re-opened to allow full consideration and response to issues raised in the DEIR.

CEQA Guidelines section 15105(a) provides that the public review of a DEIR that is submitted to the State Clearinghouse shall not be less than 45 days nor should it be longer than 60 days except under unusual circumstances. A 60-day public review period was provided. Please see the response to Comment I25-1 for a summary of how the County and the applicant have provided opportunities for public comment.

1203-2 The commenter expresses the opinion that rushing the review process resulted in postponing research and monitoring needed to determine what impacts the proposed project would have. The commenter states that the DEIR indicates that several aspects of project design, and of planning for mitigation of potentially significant impacts, would be delayed until after the project has been approved, or even until after it has been operating for 2 years.

The specific design of the mitigation can be permissibly deferred where mitigation is known to be feasible, but practical considerations prevent a lead agency from establishing specific standards early in the development process. Such deferral of the specific design of mitigation is permissible when the lead agency commits itself to devising mitigation measures that will satisfy specific performance standards for evaluating the efficacy of the measures and the project implementation is contingent upon the mitigation measures being in place (Oakland Heritage Alliance v. City of Oakland (2011) 195 Cal.App.4th 884; POET, LLC v. California Air Resources Board (2013) 218 Cal.App.4th 681, 735-738; Sacramento Old City Association v. City Council (1991) 229 Cal.App.3d 1011, 1028-1029).

Please see Master Response 1, “Site Planning and Avoidance Measures” and “Refinements to the Project Description Since Circulation of the DEIR” in Chapter 1 of this FEIR for the specific refinements to the project description that have been made since circulation of the DEIR.

Please also see Master Responses 2 through 8 for additional detail related to the analysis of impacts on biological resources, a discussion on additional surveys conducted since circulation of the DEIR, and additional refinements to the mitigation measures in the DEIR.

1203-3 The commenter questions how the project would fulfill the stated objective of promoting sustainable energy in Humboldt County if there are no assurances that power generated by the project be available for use in the County.

Please see the response to Comment I21-1 regarding energy generation and distribution.

1203-4 The commenter notes that the DEIR doesn’t include any other types of power generation, such as solar, smaller scale wind, energy conservation or demand management and believes that these should be
addressed as alternatives and that a smaller project with less significant impacts to biological resources should be considered.

Please see the response to Comment I171-10.

I203-5  The commenter believes that the DEIR downplayed and delayed consideration of mitigation of fire risks and impacts, both fire directly and fire indirectly caused by the project and impacts associated with suppression or containment intended to protect the project. The commenter further expresses the opinion that these issues should be considered, planned and disclosed to the public before project approval.

Section 3.13, “Fire Protection Services and Wildfire Hazards,” of the DEIR provides information related wildfire and Master Response 10, “Wildfire,” in this FEIR provides further discussion of regulatory requirements and mitigation measures that reduce the potential for wildfires.

I203-6  The commenter expresses the opinion that the DEIR errs in evaluating the costs associated with tree removal by considering only timber values and states that forest lands have other values beyond timber, particularly ecological values. The commenter states the opinion that the only way to reduce the ecological impacts of the project would be to preserve in perpetuity, at a greater than 1:1 mitigation ratio, nearby relatively unfragmented, mature forest land, free from logging or other commercial disturbances.

The DEIR does not evaluate the cost associated with tree removal, nor does it consider only timber values. No further response is necessary.

I203-7  The commenter states the opinion that measures intended to minimize harm to avian species should be put in place in advance of project approval and that mitigation should include preservation of mature forest land in areas closer to the project site, rather than the “within Humboldt County” specified in the DEIR and that preservation should occur prior to construction of the project. The commenter also states the belief that proposed mitigation is inadequate for northern spotted owl and eagles.

As described in Section 3.5, “Biological Resources,” the DEIR has provided a complete and thorough evaluation of all potentially affect wildlife species and committed the County to the required mitigation measures, has presented clear performance standards that have been further refined in this FEIR, and has described the means of mitigating impacts that would achieve the performance standards. Please also see Master Responses 2 through 8 for additional detail related to the analysis of impacts on biological resources, a discussion on additional surveys conducted since circulation of the DEIR, and additional refinements to the mitigation measures in the DEIR. In addition, since circulation of the DEIR, the applicant has revised the gen-tie alignment to completely avoid all northern spotted owl activity centers and to avoid nesting and roosting habitat to the maximum extent possible.

I203-8  The commenter believes that it is insufficient to determine operational impacts to bats through consultation with a technical advisory committee after the project has been built and that research on mitigation should occur prior to construction.

Please see the response to Comment I64-2 regarding bats. Please also see Master Response 4 “Bats,” for information on additional analysis of potential impacts to bats and for refinements of Mitigation Measure 3.5-18a through 3.5-18d made since circulation of the DEIR.
I203-9 The commenter expresses the opinion that mitigation should focus on on-site restoration and that funds for restoration should be set aside before construction begins and should be managed by public authorities, rather than the applicant.

The Reclamation, Revegetation, and Weed Control Plan, which is provided as Appendix B of this FEIR, provides details regarding the post-construction revegetation and restoration efforts planned. These restoration efforts will be funded by the project applicant.

I203-10 The commenter requests that the County ensure that input from local communities and tribes be taken into account.

Please see the response to Comment I25-1 for a summary of how the County and the applicant have provided opportunities for public comment. The County will take into account information provided by the tribes during AB52 consultation when considering project approval.

I203-11 The commenter believes that the DEIR doesn’t adequately address the risk of fire and that the FEIR should analyze fire risks caused or exacerbated by the project (power generation and transmission) as well as the impacts associated with measures taken to protect the project from fire.

Section 3.13, “Fire Protection Services and Wildfire Hazards,” of the DEIR provides information related wildfire and Master Response 10, “Wildfire,” in this FEIR provides further discussion of regulatory requirements and mitigation measures that reduce the potential for wildfires.
The commenter is opposed to the proposed project and states the opinion that the project would result in environmental impacts could not be mitigated. The commenter further states opinions regarding natural resources that attract tourists, ecotourism, and provides statistics on county tourism.

The County believes that an adequate evaluation of impacts on all resources potentially affected by the proposed project has been completed. The DEIR addresses the full suite of environmental impacts resulting from implementation of the proposed project. Please see Sections 3.2, “Aesthetics”; 3.3, “Agricultural and Forestry Resources”; 3.4, “Air Quality”; 3.5, “Biological Resources”; 3.7, “Geology and Soils”; 3.8, “Greenhouse Gas Emissions”; 3.9, “Hazards and Hazardous Materials”; 3.10, “Hydrology and Water Quality”; 3.11, “Noise”; and 3.12, “Transportation and Traffic” in the DEIR for an analysis of the project’s impact on these resources, and for specific mitigation measures related to impacts on these resources. Numerous technical studies were prepared and relied upon during preparation of the DEIR. Additional technical studies completed since circulation of the DEIR are included in Appendix B of this FEIR.

With respect to taxes and tourism, neither the DEIR nor this FEIR is not intended to address social or economic impacts. “An economic or social change by itself shall not be considered a significant effect on the environment” (CEQA Guidelines Sections 15131 and 15382).
1205-1 *The commenter notes that Monument and Bear River Ridges are on the Pacific Flyway and expresses concern regarding mortality to birds and bats. Where possible, the commenter identifies relevant sections of the DEIR.*

Please also see Master Responses 2 through 8 for additional detail related to the analysis of impacts on biological resources, a discussion on additional surveys conducted since circulation of the DEIR, and additional refinements to the mitigation measures in the DEIR.

In addition, the project applicant has refined the footprint of the proposed project to avoid or minimize impacts on sensitive resources since circulation of the DEIR. Please see Master Response 1, “*Site Planning and Avoidance Measures*” and “*Refinements to the Project Description Since Circulation of the DEIR*” in Chapter 1 of this FEIR for the specific refinements that have been made to the project description.

1205-2 *The commenter believes that the Wiyot tribe consider the project site to have cultural and sacred value and objects to the use of the area. The commenter further states the opinion that the EIR provides no mitigation to work with the tribes to minimize potential effects.*

Please see the responses to Comments 148-1 and 148-2. Please also see the response to comment letter T2 for specific responses to comments submitted by the Wiyot Tribe.

1205-3 *The commenter questions the applicant’s estimates of the carbon costs of construction of the proposed project.*

Please see Section 3.8 “*Greenhouse Gas Emissions,*” of the DEIR for an analysis of greenhouse gases and Master Response 9, “*Adequacy of the Greenhouse Gas Analysis,*” of the FEIR for additional in-depth information regarding the adequacy of the greenhouse gas analysis.

1205-4 *The commenter states the opinion that the EIR fails to address irregularities in climate and expected wind generation in the future.*

These topics are not among the topics to be addressed in a DEIR. The DEIR contains a thorough analysis of all CEQA mandated topics. No revisions are necessary.

1205-5 *The commenter requests that the County solicit an additional alternative from the project applicant that would provide energy with less negative impacts. The commenter also believes that a reasonable alternative is for the applicant to turn over the project facilities after 30 years and have HRC operate it as a local power source.*

Please also see the response to Comment I171-10 regarding alternatives and Master Response 11, “*Alternatives,*” for information regarding alternatives that were considered in the EIR.
The commenter asks what Calvary Community Church in Fields Landing thinks of the proposed project.

Please refer to the response to comment letter O14 for specific responses to comments submitted by the Calvary Community Church.
This comment letter is addressed to EPA and states the opinion that the DEIR does not address the damage that would be caused to Humboldt Bay and to the nature of the town of Fields Landing. The commenter further believes that the DEIR makes no mention of Aleutian geese that the commenter thinks are a protected species. The commenter also notes that FEMA recently declared Fields Landing to be in a flood zone wonders what effect the offloading of turbine components at Fields Landing would have on vulnerability to flooding. The commenter also asks if EPA has conducted a study on the project and whether the project fall under the jurisdiction of the Coastal Commission.

This comment letter is addressed to the Environmental Protection Agency. This letter does not raise specific questions or request information that pertains to the adequacy of the DEIR for addressing adverse physical impacts associated with the project, nor does it contain an argument raising significant environmental issues. This comment is published in this Response to Comment document for public disclosure and for decision maker consideration.

Please refer to the response to Comment I110-1 regarding Aleutian geese. Please refer to the responses to Comments I143-1, I160-10, and I170-4 regarding Field’s Landing. Please also refer to the response to comment letter S5 for specific responses submitted by the California Coastal Commission. The DEIR discusses project related uses in the coastal zone and identifies the need for a coastal development permit. This permit will be obtained prior to project activity in the coastal zone requiring such a permit.
The commenter expresses the opinion that some supporting studies are incomplete, that preparation of the DEIR has been rushed and that the level of information in the DEIR makes completion of an adequate environmental review not possible. The commenter further states that the project description is inadequate and that information provided by the project applicant contradicts portions of the DEIR. The commenter also expresses the opinion that mitigation measures are not explained in detail and that some would be developed in the future. The commenter expresses concern regarding the usage of the term “if feasible” in discussions of mitigation and that a detailed decommissioning plan and financial assurances are necessary.

Please see Master Response 1, “Site Planning and Avoidance Measures,” for further information on the history and siting of the proposed project. Please see the response to Comment I25-1 for a summary of how the County and the applicant have provided opportunities for public comment.

Where several measures are available to mitigate an impact, each should be discussed and the basis for selecting a particular measure should be identified. Mitigation measures may specify performance standards which would mitigate the significant effect of the project and which may be accomplished in more than one specified way. The specific details of a mitigation measure, however, may be developed after project approval when it is impractical or infeasible to include those details during the project’s environmental review provided that the agency (1) commits itself to the mitigation, (2) adopts specific performance standards the mitigation will achieve, and (3)identifies the type(s) of potential action(s) that can feasibly achieve that performance standard and that will considered, analyzed, and potentially incorporated in the mitigation measure. Compliance with a regulatory permit or other similar process may be identified as mitigation if compliance would result in implementation of measures that would be reasonably expected, based on substantial evidence in the record, to reduce the significant impact to the specified performance standards (Guidelines Section 15126.4).

The specific design of the mitigation can be permissibly deferred where mitigation is known to be feasible, but practical considerations prevent a lead agency from establishing specific standards early in the development process. Such deferral of the specific design of mitigation is permissible when the lead agency commits itself to devising mitigation measures that will satisfy specific performance standards for evaluating the efficacy of the measures and the project implementation is contingent upon the mitigation measures being in place (Oakland Heritage Alliance v. City of Oakland (2011) 195 Cal.App.4th 884; POET, LLC v. California Air Resources Board (2013) 218 Cal.App.4th 681, 735-738; Sacramento Old City Association v. City Council (1991) 229 Cal.App.3d 1011, 1028-1029).

Pursuant to CEQA Guidelines, an EIR project description should contain the location and boundaries of the proposed project by way of a map; a description of the project's technical, economic, and environmental characteristics; and a statement briefly describing the intended use of the EIR (CEQA Guidelines Section 15124[a]-[d]). The project description “should not supply extensive detail beyond that needed for evaluation and review of the environmental impact” (CEQA Guidelines Section 15124). A general conceptual discussion of the main features of the project is sufficient (CEQA Guidelines Section 15124[a], [c]; Dry Creek Citizens Coalition v. County of Tulare, 70 Cal. App. 4th 20, 27-28 [1999]).
Chapter 2, “Project Description,” of the DEIR project description contains detailed text and exhibits to illustrate the proposed project location; proposed project objectives, a summary of the project’s components, construction and phasing, project operations and maintenance, and project decommissioning.

Please also see the responses to Comments I145-1, I149-3, I171-9, and I176-3, related to the decommissioning of the proposed project.

I208-2 The commenter states that the visual resources section of the DEIR consistently underestimates visual impacts related to the proposed project and that the approach seems to be to qualitatively and arbitrarily downgrade each location by one level to assess the change from no project to with project. The commenter expresses the opinion that the photographs provided in the section are also misleading and that visual impacts from these trails and other high points to the south should be modeled.

Please see the responses to Comments R3-8, R3-9, R3-10, and R3-18, which address visual impacts.

I208-3 The commenter states the opinion that the EIR should address potential air quality impacts in all air basins potentially affected by the project including those crossed by corridors used to transport trucks, turbine components and construction workers.

Impact 3.4-1 (Short-Term, Construction-Generated Emissions of ROG, NO\textsubscript{X}, and PM\textsubscript{10}) in Section 3.4, “Air Quality,” of the DEIR provides a detailed discussion of project activities that would generate construction-related emissions. Tables 3.4-3 and 3.4-4 summarize the modeled daily and annual emissions, respectively, of ROG, NO\textsubscript{X}, PM\textsubscript{10}, and PM\textsubscript{2.5} associated with construction of the proposed project. Appendix B of the DEIR provides modeling input and output parameters, detailed assumptions, and construction emissions estimates. Implementing Mitigation Measure 3.4-1 (Use Current-Phase Equipment for all Construction Off-Road Vehicles and Equipment) would reduce construction-related emissions of ROG and NO\textsubscript{X}. As shown in Tables 3.4-5 and 3.4-6, maximum daily emissions of NO\textsubscript{X} would still exceed NCUAQMD threshold of significance. Therefore, the DEIR determined this impact would be significant and unavoidable.

I208-4 The commenter expresses the opinion that the biological resources section of the DEIR is inadequate and based on incomplete studies and that some studies have yet to begin. The commenter noted concerns regarding: the abundance of northern red-legged frog, particularly the lack of adequate surveys and the presence of western pond turtle in more of the project area than acknowledged in the DEIR. The commenter also states the opinion that temporary impacts as described in the DEIR need to be better quantified with respect to habitat degradation and temporal impacts. The commenter also states the opinion that temporary impacts as described in the DEIR need to be better quantified with respect to habitat degradation and temporal impacts and makes other requests for clarification on the biological resources impact assessment and mitigation, as summarized below.

As described in Section 3.5, “Biological Resources,” the DEIR has provided a complete and thorough evaluation of all potentially affected wildlife species and committed the County to the required mitigation measures, presented clear performance standards that have been further refined in this FEIR, and described the means of mitigating impacts that would achieve the performance standards. Please also see Master Responses 2 through 8 for additional detail related to the analysis of impacts on biological resources, a discussion on additional surveys conducted since circulation of the DEIR, and additional...
refinements to the mitigation measures in the DEIR. In addition, since circulation of the DEIR, the applicant has revised the gen-tie alignment to completely avoid all northern spotted owl activity centers and to avoid nesting and roosting habitat to the maximum extent possible.

**Northern Red-legged Frog & Western Pond Turtle.** Please see Table 3.5-5. (Special-Status Wildlife with Potential to Occur in the Biological Study Area) regarding comments on western pond turtle and northern red-legged frogs. The “Potential for Occurrence” column indicates they could be present in the project area, and the DEIR impact analysis for amphibians and reptiles is based on the assumption that these species are present.

**Temporary and Permanent Impacts.** Please see Table 3.5-9 in the FEIR for an updates summary of temporary and permanent impacts on special-status plants. Temporary impacts on vegetation are clearly defined on page 3.5-162 of the DEIR: “Temporary impacts on special-status plants are associated with ground disturbance activities that would be restricted to the construction phase, such as grading roads and clearing vegetation in staging areas. These activities are considered temporary, provided that infrastructure does not replace special-status plant populations; that the area is not maintained free of vegetation for more than one growing season; and that restoration is deemed feasible before project implementation. Any temporary impact, such as component storage and soil stockpiling, that would extend beyond 1 year would be considered a permanent impact on special-status plants.”

**Habitat Mapping.** The commenter’s request to conduct vegetation mapping to the alliance level is not warranted because the level of habitat assessments, surveys and mapping was sufficient to assess the impacts of the project on sensitive plant communities. CEQA does not require a lead agency to conduct every test or perform all research, study, and experimentation recommended or demanded by commenters. In reviewing draft EIRs, persons and public agencies should focus on the sufficiency of the document in identifying and analyzing the possible impacts on the environment and ways in which the significant effects of the project might be avoided or mitigated (CEQA Guidelines Section 15204).

**Operational Impacts on Birds.** Please see Master Response 5, “Migratory and Special-Status Birds,” and Master Response 6, “Eagles and Other Raptors.”

**Marbled Murrelet Radar Studies:** Please see Humboldt Wind Energy Project Marbled Murrelet Radar Survey Report – Year 2: October 2018–September 2019 in Appendix B of this FEIR. Two breeding seasons of radar data are now available to assess passage rates and collision risk. The second year of radar data confirms the conclusions drawn from the first year of data. The second year of survey data does not change the analysis or conclusions of the DEIR. Please also see Master Response 6, “Marbled Murrelet,” and Response to Comment O9-28.

**Fragmentation Effects on Old Growth:** Please see Master Response 6, “Northern Spotted Owl,” and the FEIR discussion of northern spotted owl impacts for discussion of the effects of fragmentation from the gen-tie line on northern spotted owl.

**Mitigation Measure 3.5a Minimize Construction Footprint.** The decisions regarding appropriate construction buffers to avoid impacts on marbled murrelet nesting habitat is decided by the resource agencies. As described in Mitigation Measure 3.5-1a (Minimize the Construction Footprint to Avoid Impacts on All Suitable Marbled Murrelet Nesting Habitat), before approval of grading or improvement
plans or any ground-disturbing activities the project applicant is required to submit documentation showing buffers and approval by CDFW and USFWS for those buffers.

**Mitigation Measure 3.5b (Avoid Marbled Murrelet Nesting Habitat).** Please see Master Response 2, “Marbled Murrelet,” and Supplement to Humboldt Wind Energy Project Marbled Murrelet Habitat Assessment and Auditory and Visual Disturbance Analysis Report prepared by H.T. Harvey & Associates and Stantec Consulting, Inc. dated September 30, 2019 for a discussion of buffers that will be implemented during construction to avoid impacts on nesting marbled murrelets.

**Impact 3.5-1 (Construction Impacts on Marbled Murrelets).** The commenter disagrees with the assessment that impacts on marbled murrelet habitat will be less than significant with implementation of avoidance and mitigation measures because of a full commitment to avoiding mature conifer forest. As described on page 3.5-72 of the DEIR no construction impacts will occur on mature conifer forest, and this avoidance will be verified by the agencies, as described in Mitigation Measure 3.5-a.

**Impact 3.5-2 – Operational Impacts on Marbled Murrelets.** The commenter disagrees with the assessment that impacts on marbled murrelet habitat will be less than significant with implementation of avoidance and mitigation measures because of a full commitment to avoiding mature conifer forest. As described on page 3.5-72 of the DEIR no construction impacts will occur on mature conifer forest, and this avoidance will be verified by the agencies, as described in Mitigation Measure 3.5-a.


**Impact 3.5-4 Eagles.** Please see Master Response 6, “Eagles and Other Raptors,” for a discussion of the impacts of the gen-tie line on eagles and for a discussion of the refinements to the measure calling for minimizing rodent populations. This master response also addresses the issue of retrofitting of power poles as an appropriate mitigation for offsetting eagle take.

**Fully Protected Species.** Please see the response to Comment I187-1. The DEIR setting section provides a discussion of fully protected species and Table 3.5-5 identifies which species potentially occurring in the project area have fully protected status, and the DEIR impact section provides a discusses the potential for take as a result of construction or operation. With the exception of golden eagle, the likelihood of take for any fully protected species is very low. The applicant will obtain an eagle take permit from the USFWS and will comply with all avoidance and mitigation measures required in that permit. Please see Master Response 6, “Eagles and Other Raptors,” for a discussion of project impacts and mitigation for eagles.

**Northern Spotted Owl Surveys, Habitat Fragmentation, Mitigation.** Please see Master Response 3, “Northern Spotted Owl, “Northern Spotted Owl Survey Results 2019: Humboldt Wind Energy Project, Humboldt County, California prepared by ICF, dated September 2019, and Humboldt Wind Energy Project – Northern Spotted Owl Activity Center Occurrences Discussion and Figures, prepared by Stantec Consulting Services, Inc., dated September 3, 2019, both in Appendix B of this FEIR.
Northern Harriers Nesting in Project Area. As discussed in the DEIR northern harriers are common migrant and winter visitors in northwestern California to the project area but are uncommon breeders and summer resident. The DEIR appropriate characterizes this species as unlikely to breed in the project area.

Impact 3.5-10 (Construction Impacts on Nesting Raptors) and Mitigation Measure 3.5-11 (Mitigation Measure 3.5-11: Avoid, Minimize, and Compensate for Operational Impacts on Raptors. Please see Master Response 6, “Eagles and Other Raptors,” for a discussion of proposed avoidance, minimization and mitigation measures for potential impacts of project operation and construction on raptors.

Mitigation Measure 3.5-14, Mitigation Measure 3.5-14: Avoid and Minimize Operational Impacts on Nonraptor Birds. Please see Master Response 5, “Migratory and Special-Status Birds,” and Responses to Comments S4-11 and S4-13. Please note that take of any listed species (e.g., willow flycatcher or yellow-billed cuckoo) is considered very low, as discussed in DEIR Section 3.5.

Bats Mitigation Measures and TAC. Please see Master Response O4, “Bats,” and Response to Comments O9-13 through O9-17.

Amphibians and Reptiles. As described in Section 3.5, “Biological Resources,” pages 3.5-145 through 3.5-153 the DEIR has provided a complete and thorough evaluation of all potentially affected reptiles and amphibians and committed the County to the required mitigation measures, has presented clear performance standards that have been further refined in this FEIR, and has described the means of mitigating impacts that would achieve the performance standards.

Fish and Aquatic, Erosion and Sedimentation, and Eelgrass. Please see the response to Comment O9-11 for a discussion of erosion, water quality and impacts on sensitive fish populations. Please see the response to Comment S4-21 for additional details on eelgrass avoidance and minimization of impacts to Sensitive Natural Communities.

Please see Master Response 7, “Special-Status Plants and Sensitive Plant Communities,” and the Revegetation, Reclamation, and Weed Control Plan, included as Appendix B in this FEIR.

1208-5 The commenter states that the cultural resources section does not give adequate weight to the presence of known tribal resources and sacred sites on the ridges, around the Bridgeville substation, and possibly in other locations.

Please see the responses to Comments I148-1 and I148-2.

1208-6 The commenter states that the greenhouse gas analysis should be re-done to include all impacts and to account for the effects of forest removal, including carbon sequestration.

Please also see Master Response 9, “Adequacy of the Greenhouse Gas Analysis,” for additional in-depth information regarding the adequacy of the greenhouse gas analysis, including an analysis of carbon sequestration, and results of additional modelling completed to substantiate the findings presented in the DEIR.

1208-7 The commenter requests further discussion of expected rainfall in the project area, including data collected in support of the DEIR, stating that the amount of precipitation is important to impact analysis
and development of mitigation measures. The commenter also expresses concern that standard mitigation measures may not be adequate to prevent adverse impacts to water and nearby communities, the latter especially with regards to landslides.

Please see the responses to Comments I171-6, I171-7, and I176-7, which address erosion and sediment discharge, erosion control, and landslides. A discussion of expected rainfall would be speculative and would not change the impact conclusions presented in the DEIR. No further revisions are necessary.

The commenter states the opinion that the DEIR’s discussion of traffic impacts is inadequate and expresses concern that mitigation measures do not address impacts to Hwy 101.

Section 3.12, “Transportation and Traffic,” in the DEIR analyzes the proposed project impacts on traffic, including specific impacts to Highway 101 during construction. A construction traffic management plan must be prepared as a condition of the project. That plan would identify haul routes, construction worker traffic patterns, and detour routes for implementation during transportation of heavy project components. Mitigation measures identified in Section 3.12, “Transportation and Traffic,” of the DEIR require the construction contractor to obtain Caltrans permits for wide and heavy loads and repair any damage sustained to Highway 101 as a result of the project.

The commenter states the belief that wind turbines increase the risk of wildfires which could put sensitive habitats at risk.

Section 3.13, “Fire Protection Services and Wildfire Hazards,” of the DEIR provides information related to wildfire and Master Response 10, “Wildfire” in this FEIR provides further discussion of regulatory requirements and mitigation measures that reduce the potential for wildfires.

Please see the Reclamation, Revegetation, and Weed Control Plan (Plan) prepared by Stantec Consulting Services Inc., dated September 23, 2019 in Appendix B in this FEIR. As described in the Plan temporary impacts on sensitive plant communities will be restored on site. For areas of permanent impacts off-site restoration may occur if needed to achieve compensatory mitigation goals described in the Plan. Revegetation and mitigation will be required not only by the Humboldt County Planning & Building Department but by agencies such as the U.S. Army Corps of Engineers the Regional Water Quality Control Board, and CDFW. Humboldt County and these agencies will assure that restoration and mitigation occur as required in the Plan and as required to satisfy permit conditions.

The commenter expresses the opinion that cumulative impacts in the DEIR are understated and that this section of the EIR provide a more detailed analysis, based on Timber Harvest Plans.

As stated in Chapter 4, “Cumulative Impacts,” the cumulative impact analysis is based on the State CEQA Guidelines (in Section 15130[b]) that provide the following guidance for conducting an adequate cumulative impact analysis: The discussion of cumulative impacts shall reflect the severity of the impacts and their likelihood of occurrence, but the discussion need not provide as great detail as is provided for the effects attributable to the project alone. The discussion should be guided by the standards of practicality and reasonableness, and should focus on the cumulative impact to which the identified other projects contribute rather than the attributes of other projects which do not contribute to the cumulative impact.
This letter provides additional references associated with the Siskiyou Land Conservancy comment letter (O9), including a letter from PG&E regarding recommended actions to prepare for public safety power outages.

The attached references have been linked with comment letter O9. Please also refer to the response to comment letter O8 for specific responses to comments submitted by the Siskiyou Land Conservancy.
I210-1 *The commenters express the opinion that the proposed project presents a high fire risk.*

Section 3.13, “Fire Protection Services and Wildfire Hazards,” of the DEIR provides an analysis of wildfire impacts and Master Response 10, *Wildfire,* in this FEIR provides further discussion of the history of wildfire in the region and regulatory requirements and mitigation measures that reduce the potential for wildfires.

I210-2 *The commenters believe that the DEIR fails to estimate the costs associated with road, bridge and overpass construction and maintenance.*

Cost estimates are not part of a DEIR. No further response is necessary.

I210-3 The commenters express concern regarding excavation and removal of soil associated with construction of roads on ridgelines and turbine footings and believe that the impacts caused by this proposed work is not adequately addressed in the DEIR.

As discussed in Mitigation Measure 3.7-2a (Prepare Site-Specific Design-Level Geotechnical Report per CBC Requirements and Implement Appropriate Recommendations), before building permits are issued and construction activities begin on any project component, the project applicant shall hire a licensed geotechnical engineer to prepare a final, design-level geotechnical subsurface investigation report, which will be submitted for review and approval to the Humboldt County Planning and Building Department. In addition, in accordance with Mitigation Measure 3.7-2b (Monitor Earthwork during Earthmoving Activities), all earthwork during construction would be monitored by a licensed geotechnical, civil, or soils engineer. The engineer will provide oversight during all excavation, placement of fill, and disposal of materials removed from and deposited on both on-site and off-site construction areas.

Please also see the responses to Comments I171-6 and I171-7, which address erosion and sediment discharge and erosion control.

I210-4 *The commenters are concerned about the adverse impacts on wildlife, particularly raptors and especially the California condor.*

Please also see Master Responses 2 through 8 for additional detail related to the analysis of impacts on biological resources, a discussion on additional surveys conducted since circulation of the DEIR, and additional refinements to the mitigation measures in the DEIR. Regarding concerns about condors, please see the response to Comment I65-1.

I210-5 *The commenters express the opinion that reductions in wildlife species must be described in the EIR.*

Please see response to I210-4.
The commenters note the existence of studies undertaken in the Midwest on the effects of wind turbines on soil life, including worms, other invertebrates and microbes, such as loss of worms due to vibrations. The commenters express the opinion that the effects of wind farms should be researched for the final EIR.

CEQA does not require a lead agency to conduct every test or perform all research, study, and experimentation recommended or demanded by commenters. In reviewing draft EIRs, persons and public agencies should focus on the sufficiency of the document in identifying and analyzing the possible impacts on the environment and ways in which the significant effects of the project might be avoided or mitigated (CEQA Guidelines Section 15204).

An EIR is not inadequate simply because experts in a particular environmental subject matter dispute the conclusions reached by the experts whose studies were used in drafting the EIR, even where different conclusions can reasonably be drawn from a single pool of information. (CEQA Guidelines Section 15151; Guide to the California Environmental Quality Act [CEQA] [Remy et al. 2007:499–500]; Greenebaum v. City of Los Angeles [1984] 153 Cal. App. 3d 391, 413.) Perfection is not required, but the EIR must be adequate, complete and a good faith effort at full disclosure (CEQA Guidelines Section 15151). The DEIR for the proposed project provides an adequate, complete and good faith effort at full disclosure of the physical environmental impacts and the conclusions are based upon substantial evidence in light of the whole record.

The commenters state the belief that the DEIR fails to address effects on public health, including mental health, associated with wind turbines, provide links to four websites. The commenters state that every study of impacts should be read and referenced.

Please see the response to Comment I210-8. With regard to mental health, neither the DEIR nor this FEIR is not intended to address social or economic impacts. “An economic or social change by itself shall not be considered a significant effect on the environment” (CEQA Guidelines Sections 15131 and 15382).

The commenters express the opinion that the alternatives provided in the DEIR are not enough and note that they support the No Project alternative. The commenters also favor community-based energy projects, such as smaller wind generators, solar and other initiatives that could provide the same or more renewable energy without the adverse effects on wildlife, soil, watersheds and human health.

Please see the response to Comment I171-10 and Master Response 11, “Alternatives,” for information regarding alternatives that were considered in the EIR.

The commenters urge the County to completely review and update the DEIR to address every impact of the project for public evaluation.

The County believes that an adequate evaluation of impacts on all resources potentially affected by the proposed project has been completed. The DEIR addresses the full suite of environmental impacts resulting from implementation of the proposed project. Please see Sections 3.2, “Aesthetics”; 3.3, “Agricultural and Forestry Resources”; 3.4, “Air Quality”; 3.5, “Biological Resources”; 3.7, “Geology and Soils”; 3.8, “Greenhouse Gas Emissions”; 3.9, “Hazards and Hazardous Materials”; 3.10, “Hydrology and Water Quality”; 3.11, “Noise”; and 3.12, “Transportation and Traffic” in the DEIR for an analysis of the project’s impact on these resources, and for specific mitigation measures related to impacts on these
resources. Numerous technical studies were prepared and relied upon during preparation of the DEIR. Additional technical studies completed since circulation of the DEIR are included in Appendix B of this FEIR.
The commenter opposes the proposed project and believes that the project would adversely impact native grasslands, wildlife and watersheds. The commenter expresses the opinion that the project is being rushed through and that the DEIR is incomplete and many issues haven’t been resolved, such as water use, effects of the turbine footings and the effect on deciduous species.

Please see Master Response 1, “Site Planning and Avoidance Measures” for further information on the history and siting of the proposed project.

The County believes that an adequate evaluation of impacts on all resources potentially affected by the proposed project has been completed. The DEIR addresses the full suite of environmental impacts resulting from implementation of the proposed project. Please see Sections 3.2, “Aesthetics”; 3.3, “Agricultural and Forestry Resources”; 3.4, “Air Quality”; 3.5, “Biological Resources”; 3.7, “Geology and Soils”; 3.8, “Greenhouse Gas Emissions”; 3.9, “Hazards and Hazardous Materials”; 3.10, “Hydrology and Water Quality”; 3.11, “Noise”; and 3.12, “Transportation and Traffic” in the DEIR for an analysis of the project’s impact on these resources, and for specific mitigation measures related to impacts on these resources. Numerous technical studies were prepared and relied upon during preparation of the DEIR. Additional technical studies completed since circulation of the DEIR are included in Appendix B of this FEIR.
I212-1  The commenter expresses the opinion that the DEIR fails to describe technical, economic and environmental aspects of the proposed project, that it withholds critical information, circumvents comprehensive analysis, piecemeals the project, and impedes attainment of CEQA’s goals.

The DEIR follows a standard format and outline for impact analysis conducted pursuant to CEQA. A project of this nature is inherently complex and the analysis in the DEIR is supported by many technical studies presented in technical Appendices.

The County believes that an adequate evaluation of the project’s impact on all resources has been completed. The DEIR addresses the full suite of environmental impacts resulting from implementation of the proposed project. Please see Sections 3.2, “Aesthetics”; 3.3, “Agricultural and Forestry Resources”; 3.4, “Air Quality”; 3.5, “Biological Resources”; 3.7, “Geology and Soils”; 3.8, “Greenhouse Gas Emissions”; 3.9, “Hazards and Hazardous Materials”; 3.10, “Hydrology and Water Quality”; 3.11, “Noise”; and 3.12, “Transportation and Traffic” in the DEIR for an analysis of the project’s impact on these resources, and for specific mitigation measures related to impacts on these resources. Numerous technical studies were prepared and relied upon during preparation of the DEIR. A list of additional technical studies completed since circulation of the DEIR is included in Chapter 1 of this FEIR and these studies are included in Appendix B of this FEIR, as appropriate.

I212-2  The commenter states that certain aspects of fire hazards are not described in the DEIR. The commenter cites economic concerns and includes in the letter the results of research regarding economic characteristics of the project area and potential consequences, hazards, and damages posed by the project to the affected economic area. The commenter states that based on the research, the project would impair carbon sequestration, decrease tax base values, increase the need for irrigation, and that tributary stream flow will likely decrease in summer.

CEQA does not require a lead agency to conduct every test or perform all research, study, and experimentation recommended or demanded by commenters. In reviewing draft EIRs, persons and public agencies should focus on the sufficiency of the document in identifying and analyzing the possible impacts on the environment and ways in which the significant effects of the project might be avoided or mitigated (CEQA Guidelines Section 15204).

An EIR is not inadequate simply because experts in a particular environmental subject matter dispute the conclusions reached by the experts whose studies were used in drafting the EIR, even where different conclusions can reasonably be drawn from a single pool of information. (CEQA Guidelines Section 15151; Guide to the California Environmental Quality Act [CEQA] [Remy et al. 2007:499–500]; Greenebaum v. City of Los Angeles [1984] 153 Cal. App. 3d 391, 413.) Perfection is not required, but the EIR must be adequate, complete and a good faith effort at full disclosure (CEQA Guidelines Section 15151). The DEIR for the proposed project provides an adequate, complete, and good faith effort at full disclosure of the physical environmental impacts and the conclusions are based upon substantial evidence in light of the whole record.
Section 3.13, “Fire Protection Services and Wildfire Hazards,” of the DEIR provides information related to wildfire and Master Response 10, “Wildfire,” in this FEIR provides further discussion of regulatory requirements and mitigation measures that reduce the potential for wildfires.

The commenter expresses the opinion that the project would decrease tax base values. This DEIR is not intended to address social or economic impacts. “An economic or social change by itself shall not be considered a significant effect on the environment” (CEQA Guidelines Sections 15131 and 15382).

I212-3 The commenter provides greenhouse gas studies and states that based on the research, the DEIR does not describe or analyze local greenhouse gas effects.

Please see Master Response 9, “Adequacy of the Greenhouse Gas Analysis,” for additional in-depth information regarding the adequacy of the greenhouse gas analysis, including information on carbon sequestration, and results of additional modelling completed to substantiate the findings presented in the DEIR. Please also see the response to Comment I212-2.

I212-4 The commenter cites studies related to changes in fog layers and states that the DEIR did not address fog effects.

Please see the responses to Comments I212-1 and I212-2.

I212-5 The commenter states that the project applicant is purposefully withholding critical information from the public. The commenter states that Humboldt County learned a hard lesson about California case law that requires courts to uphold a proponent’s “right to lie in pursuit of obtaining a CEQA approval.” The commenter asks which class of people would benefit from the project and if the underlying purpose of the project to get tax credits.

Please see the responses to Comments I212-1 and I212-2.

The commenter mentions a previous Humboldt County court case related to CEQA but does not cite the specific case that is being referenced. No further response is required.

I212-6 The commenter asks if the primary objective of the project is to reduce the cost of renewable energy generation and delivery for Humboldt County ratepayers and if the project is intended to achieve zero carbon energy. The commenter describes their research on other types of renewable energy and other types of wind energy projects and asks if alternatives were considered that included these other types of renewable energy and wind projects.

Please see the responses to Comments I212-1 and I212-2. Please also see the response to Comment I171-10 regarding alternatives.
I213-1  The commenter requests a longer public comment period and expresses the opinion that the DEIR fails to identify many impacts, thus did not analyze or mitigate them.

Please see the response to Comment I25-1 for a summary of how the County and the applicant have provided opportunities for public comment.

The County believes that an adequate evaluation of the impacts on all resources potentially affected by the proposed project has been completed. The DEIR addresses the full suite of environmental impacts resulting from implementation of the proposed project. Please see Sections 3.2, “Aesthetics”; 3.3, “Agricultural and Forestry Resources”; 3.4, “Air Quality”; 3.5, “Biological Resources”; 3.7, “Geology and Soils”; 3.8, “Greenhouse Gas Emissions”; 3.9, “Hazards and Hazardous Materials”; 3.10, “Hydrology and Water Quality”; 3.11, “Noise”; and 3.12, “Transportation and Traffic” in the DEIR for an analysis of the project’s impact on these resources, and for specific mitigation measures related to impacts on these resources. Numerous technical studies were prepared and relied upon during preparation of the DEIR. Additional technical studies completed since circulation of the DEIR are included in Appendix B of this FEIR.
The commenter is opposed to the proposed project and requests that the County pursue decentralized energy production, such as solar panels.

This comment does not raise specific questions or request information that pertains to the adequacy of the DEIR for addressing adverse physical impacts associated with the project, nor does it contain an argument raising significant environmental issues. This comment is published in this Response to Comments document for public disclosure and for decision maker consideration.

Please also see the response to Comment I171-10 and Master Response 11, “Alternatives,” for information regarding alternatives that were considered in the EIR.
The commenter is opposed to the proposed project and expresses the opinion that the proposed project would result in significant adverse effects to aesthetics and visual resources, air quality, biological resources, hazards, hydrology and water quality, noise and vibration, transportation and circulation, tribal cultural resources and wildfire.

The County believes that an adequate evaluation of impacts on all resources potentially affected by the proposed project has been completed. The DEIR addresses the full suite of environmental impacts resulting from implementation of the proposed project. Please see Sections 3.2, “Aesthetics”; 3.3, “Agricultural and Forestry Resources”; 3.4, “Air Quality”; 3.5, “Biological Resources”; 3.7, “Geology and Soils”; 3.8, “Greenhouse Gas Emissions”; 3.9, “Hazards and Hazardous Materials”; 3.10, “Hydrology and Water Quality”; 3.11, “Noise”; and 3.12, “Transportation and Traffic” in the DEIR for an analysis of the project’s impact on these resources, and for specific mitigation measures related to impacts on these resources. Numerous technical studies were prepared and relied upon during preparation of the DEIR. Additional technical studies completed since circulation of the DEIR are included in Appendix B of this FEIR.

In addition, the project applicant has refined the footprint of the proposed project to avoid or minimize impacts on sensitive resources since circulation of the DEIR. Please see “Refinements to the Project Description Since Circulation of the DEIR” in Chapter 1 of this FEIR for the specific refinements to the project description that have been made since circulation of the DEIR.
I216-1 The commenter is opposed to the proposed project and expresses concern regarding statements made by the project applicant’s representatives at one of the public meetings. The commenter believes that the DEIR is incomplete, missing data, is out of date, postponed, or based on gross assumptions and being fast tracked. The commenter states the belief that redwoods and native grasslands function as important carbon sequestration areas and suggests that calculations be done to determine the carbon offset and greenhouse gas emission reduction associated with the project. The commenter further requests studies on wind turbine draft effects prior to removal of redwood trees and expresses the opinion that the proposed loss of trees exceeds the limits and restrictions on logging. The commenter also questions the disposal of the timber removed.

The County believes that an adequate evaluation of impacts on all resources potentially affected by the proposed project has been completed. The DEIR addresses the full suite of environmental impacts resulting from implementation of the proposed project. Please see Sections 3.2, “Aesthetics”; 3.3, “Agricultural and Forestry Resources”; 3.4, “Air Quality”; 3.5, “Biological Resources”; 3.7, “Geology and Soils”; 3.8, “Greenhouse Gas Emissions”; 3.9, “Hazards and Hazardous Materials”; 3.10, “Hydrology and Water Quality”; 3.11, “Noise”; and 3.12, “Transportation and Traffic” in the DEIR for an analysis of the project’s impact on these resources, and for specific mitigation measures related to impacts on these resources. Numerous technical studies were prepared and relied upon during preparation of the DEIR. Additional technical studies completed since circulation of the DEIR are included in Appendix B of this FEIR.

Please see Master Response 1, “Site Planning and Avoidance Measures,” for further information on the history and siting of the proposed project. Please also see the response to Comment I25-1 for a summary of how the County and the applicant have provided opportunities for public comment.


I216-2 The commenter states the opinion that the photographic simulations depict smaller turbines than proposed by the project. The commenter indicates that lighting on the turbines and shadow flicker could adversely affect their health.

Please see the responses to Comments R3-8, R3-9, R3-10, R3-18, I149-1, which address visual impacts and lighting.

Shadow flicker is addressed in Section 3.2, “Aesthetics,” of the DEIR in Impact 3.2-4 on page 3.2-65. Because of the lack of strong evidence of health impacts from shadow flicker, this impact is found to be less than significant. The commenter does not provide specific details or evidence about the ways they think shadow flicker could affect their health and whether they reside in a place that could be affected by shadow flicker. No further response is required.
The commenter expresses concern regarding the bird surveys, stating the belief that they are inadequate and that most of the California fully protected bird species that the commenter thinks would be impacted by the project are not included as potential concerns in DEIR. The commenter expresses particular concern regarding the potential harm to condors.

As described in Section 3.5, “Biological Resources,” the DEIR has provided a complete and thorough evaluation of all potentially affect wildlife species and committed the County to the required mitigation measures, has presented clear performance standards that have been further refined in this FEIR, and has described the means of mitigating impacts that would achieve the performance standards. Please also see the response to Comment I65-1 regarding California condors.

Please also see Master Responses 2 through 8 for additional detail related to the analysis of impacts on biological resources, a discussion on additional surveys conducted since circulation of the DEIR, and additional refinements to the mitigation measures in the DEIR.

In addition, the project applicant has refined the footprint of the proposed project to avoid or minimize impacts on sensitive resources since circulation of the DEIR. Please see Master Response 1, “Site Planning and Avoidance Measures,” and “Refinements to the Project Description Since Circulation of the DEIR” in Chapter 1 of this FEIR for the specific refinements that have been made to the project description.

The commenter expresses the opinion that the proposed mitigation for marbled murrelet has not been successful in the past and that there is not enough data to conclude that the project is safe for murrelets or other birds.

Please see Master Response 2, “Marbled Murrelet,” which describes the results of the Humboldt Wind Energy Project Marbled Murrelet Radar Survey Report – Year 2. The full report is included in Appendix B of this FEIR.

The commenter states opinions that the proposed project would adversely affect scenic roadways, that the turbine components to be transported on the local roads are too large and heavy for them, and that areas disturbed by roadways take a long time to return to previous conditions.

Section 3.12, “Transportation and Traffic” in the DEIR analyzes the proposed project impacts on traffic, including specific impacts to local roadways during construction and the response to Comment I208-8.

The commenter is concerned about impacts to local air quality from the use of diesel vehicles and disagrees with amortization of emissions over the full life of the project, stating that this calculation must be redone. The commenter also is concerned with the potential restrictions to be placed on a number of roads because loss of access can have a significant impact on the local community.

Please see the response to Comment 218-3.
The commenter expresses concern regarding increased fire risk from the turbines themselves and from the gen-tie line.

Section 3.13, “Fire Protection Services and Wildfire Hazards,” of the DEIR provides an analysis of wildfire impacts and Master Response 10, “Wildfire” of this FEIR provides further discussion of the history of wildfire in the region and regulatory requirements and mitigation measures that reduce the potential for wildfires.

The commenter questions the length of the gen-tie line, stating that there are other substations closer to the turbine locations that would make more sense.

The applicant conducted a detailed technical analysis of substations that have capacity to feed the power generated by the proposed project into the regional grid and the Bridgeville substation was chosen based on the technical feasibility. Since circulation of the DEIR, the project applicant has refined the project description. Project applicant has refined the footprint of the proposed project, including reducing the number of turbines, and shortening the gen-tie by several miles, to avoid or minimize impacts on sensitive resources. Please see Master Response 1, “Site Planning and Avoidance Measures” for technical details that were applied to project siting and “Refinements to the Project Description Since Circulation of the DEIR” in Chapter 1 of this FEIR for the specific refinements to the project description that have been made since circulation of the DEIR.

The commenter expresses the opinion that the proposed project is unreasonable for the area which could be better served by multiple small energy generating projects. The commenter further states the belief that the size of the turbines is considerably larger than any other structure in the area. The commenter also expresses the opinion that the project would cause significant and largely unmitigable effects and incomplete plans and questions the efficiency of carbon reduction relative to the existing natural system. The commenter also expresses the opinion that few jobs would result from the project and that tax income is expected to be low.

Please see the response to Comment I216-1. Please see the response to Comment I21-1 regarding energy generation and distribution. Please also see the response to Comment I171-10 regarding alternatives and Master Response 11, “Alternatives,” for information regarding alternatives that were considered in the EIR. Regarding taxes, neither the DEIR nor this FEIR is intended to address social or economic impacts. “An economic or social change by itself shall not be considered a significant effect on the environment” (CEQA Guidelines Sections 15131 and 15382).
The commenter indicates that the major concern is the speed with which the DEIR was prepared, expressing the opinion that this was possible because analysis of many topics is deferred to some later time; the commenter specifies geological studies and the plan for the Jordan Creek access road. The commenter believes that the proposed project should be evaluated by three or four EIRs (one for the Jordan Creek access road, one for the clear cutting of 900 acres, one for the wind turbines, and one for the transmission line corridor) and thus the County should reject the existing DEIR.

The County believes that an adequate evaluation of impacts on all resources potentially affected by the proposed project has been completed. The DEIR addresses the full suite of environmental impacts resulting from implementation of the proposed project. Please see Sections 3.2, “Aesthetics”; 3.3, “Agricultural and Forestry Resources”; 3.4, “Air Quality”; 3.5, “Biological Resources”; 3.7, “Geology and Soils”; 3.8, “Greenhouse Gas Emissions”; 3.9, “Hazardous and Hazardous Materials”; 3.10, “Hydrology and Water Quality”; 3.11, “Noise”; and 3.12, “Transportation and Traffic” in the DEIR for an analysis of the project’s impact on these resources, and for specific mitigation measures related to impacts on these resources. Numerous technical studies were prepared and relied upon during preparation of the DEIR. Additional technical studies completed since circulation of the DEIR are included in Appendix B of this FEIR.

The specific design of the mitigation can be permissibly deferred where mitigation is known to be feasible, but practical considerations prevent a lead agency from establishing specific standards early in the development process. Such deferral of the specific design of mitigation is permissible when the lead agency commits itself to devising mitigation measures that will satisfy specific performance standards for evaluating the efficacy of the measures and the project implementation is contingent upon the mitigation measures being in place (Oakland Heritage Alliance v. City of Oakland (2011) 195 Cal.App.4th 884; POET, LLC v. California Air Resources Board (2013) 218 Cal.App.4th 681, 735-738; Sacramento Old City Association v. City Council (1991) 229 Cal.App.3d 1011, 1028-1029).

Please see Master Response 1, “Site Planning and Avoidance Measures,” for further information on the history and siting of the proposed project.

In addition, multiple opportunities for public comment have been provided over the course of this environmental review process and more will be offered when the project is considered by the Planning Commission at a public hearing. Please see the response to Comment I25-1 for a summary of how the County and the applicant have provided opportunities for public comment.

With regards to the preparation of multiple EIRs, a lead agency must analyze all impacts related to a specific project in a single CEQA document. The approach suggested by the commenter would be considered “piece-mealing,” which is not allowed under CEQA.
The commenter believes that the DEIR does not address major concerns and that the document is inconclusive, and in some aspects, misleading. The commenter recommends that the County require the project applicant to undertake additional investigations and to report the results in a revised DEIR.

Please see the response to Comment I217-1. The DEIR follows a standard format and outline for impact analysis conducted pursuant to CEQA. A project of this nature is inherently complex and the analysis in the DEIR is supported by many technical studies presented in technical Appendices.

Furthermore, CEQA does not require a lead agency to conduct every test or perform all research, study, and experimentation recommended or demanded by commenters. In reviewing draft EIRs, persons and public agencies should focus on the sufficiency of the document in identifying and analyzing the possible impacts on the environment and ways in which the significant effects of the project might be avoided or mitigated (CEQA Guidelines Section 15204).

Please also see Appendix B of this FEIR for additional technical studies prepared since circulation of the DEIR. None of these studies change the impact conclusions reached in the DEIR.
The commenter is opposed to the proposed project because of the loss of carbon sequestration, destruction of culturally sensitive Wiyot territory, and increased wildfire risk. The commenter also states there would be low revenue and few jobs for Humboldt County residents. The commenter expresses the opinion that there is a troublesome alliance with Terra Gen.


Please see the responses to Comments 148-1 and 148-2. Supplemental information regarding tribal cultural resources in the FEIR provides additional information based on site specific studies conducted since circulation of the DEIR. Please also see the response to comment letter T2 for specific responses to comments submitted by the Wiyot Tribe.

Section 3.13, “Fire Protection Services and Wildfire Hazards,” of the DEIR provides an analysis of wildfire impacts and Master Response 10, “Wildfire,” of this FEIR provides further discussion of the history of wildfire in the region and regulatory requirements and mitigation measures that reduce the potential for wildfires.

With regard to tax revenue, neither the DEIR nor this FEIR is not intended to address social or economic impacts. “An economic or social change by itself shall not be considered a significant effect on the environment” (CEQA Guidelines Sections 15131 and 15382).

Regarding the comment about a troublesome alliance with Terra-Gen, this is an opinion. This comment does not raise specific questions or request information that pertains to the adequacy of the DEIR for addressing adverse physical impacts associated with the project.
The commenter is in favor of the proposed project and believes that in approving the project, the County would serve as an example to other communities. The commenter does, however, recognize the potential adverse effects on birds and bats and suggest reducing the number of turbines and using the largest feasible size to still achieve the 155 MW proposed would be a reasonable option for reducing mortality.

The support for the project is noted. Please see Master Responses 2 through 8 for additional detail related to the analysis of impacts on biological resources, a discussion on additional surveys conducted since circulation of the DEIR, and additional refinements to the mitigation measures in the DEIR. In addition, since circulation of the DEIR, the project applicant has refined the footprint of the proposed project, including reducing the number of turbines, to avoid or minimize impacts on sensitive resources. Please see Master Response 1, “Site Planning and Avoidance Measures,” and “Refinements to the Project Description Since Circulation of the DEIR” in Chapter 1 of this FEIR for the specific refinements to the project description that have been made since circulation of the DEIR.
I220-1 The commenter expresses the opinion that the DEIR is factual and thorough and states the belief that the section on aesthetics in the EIR is quite thorough, more so than in previous documents. The commenter, who worked for Electric Power Research Institute, indicates that residents living near wind turbines initially complained about their expected appearance, noise and road damage. The commenter reports that the vast majority of residents hardly noticed the turbines after installation, that newer turbines emit very little noise, and that the DEIR appropriately addresses road damage in the DEIR.

The support for the project is noted. This comment does not raise specific questions or request information that pertains to the adequacy of the DEIR for addressing adverse physical impacts associated with the project, nor does it contain an argument raising significant environmental issues. This comment is published in this Response to Comments document for public disclosure and for decision maker consideration.

I220-2 The commenter thinks that Section 3.8 should better explain the effects of climate change and believes that the DEIR understates the project’s contribution to GHG reduction.

Please also see Master Response 9, “Adequacy of the Greenhouse Gas Analysis,” for additional in-depth information regarding the adequacy of the greenhouse gas analysis, including an analysis of carbon sequestration and the results of the additional modeling completed to substantiate the findings presented in the DEIR.

I220-3 The commenter states the belief that the O&M building would use propane or electricity rather than natural gas as stated in the DEIR. The commenter also recounted recollections of talking with O&M workers who are all enthusiastic about what they are doing because they understand they are doing good for the planet.

This comment does not raise specific questions or request information that pertains to the adequacy of the DEIR for addressing adverse physical impacts associated with the project, nor does it contain an argument raising significant environmental issues. No further response is required.
The commenter states the opinion that the proposed project—energy generation without greenhouse gas emissions—is the right thing, but that the location would lead to widespread impacts and the project should be denied.

Please see Master Response 1, “Site Planning and Avoidance Measures,” which addresses project siting, planning, and design criteria. The commenter’s opposition to the project is noted. No further response is necessary.
The commenter provides a number of comments and information primarily regarding greenhouse gas emissions.


The commenter expresses the opinion that the DEIR doesn’t fully address impacts on soil from the turbine footings or the proposed new roads and provides a number of calculations regarding area of disturbance.

Please see the responses to Comments I171-6 and I171-7, which address erosion and soil stability. Please see the responses to Comments I87-2, I187-1, and I188-7 regarding impacts from roads.

The commenter states the belief that exposed soil loses 90% of its carbon in 20 years and requests a plan to prevent that loss and further requests calculation of the reduction in carbon sequestration associated with the loss of trees and other vegetation. The letter also discusses other soil impacts that the commenter believes could occur as a result of the project.

Please see the response to Comment I222-3 regarding greenhouse gas emissions. Please see the responses to Comments I171-6 and I171-7, which address erosion and sediment discharge and erosion control.

The commenter expresses the opinion that the DEIR doesn’t adequately discuss the severity of local seismicity which has resulted in landslides. The commenter also states the opinion that the DEIR provides no analysis of the potential for vibration associated with the WTGs would weaken underlying geologic formations.

Please see the response to Comment I171-6, which discusses strong seismic ground shaking and landslide hazards. The response to Comment I188-2 discusses the potential impacts associated with earthquake faults. Please also see the response to Comment I121-1, which addresses effects of vibration.

The commenter expresses concern regarding air quality temperature changes associated with the turbines.

In harnessing wind energy, turbines disturb air currents to a degree that they actually alter the climate of the surrounding area. Most of these arguments cite a 2012 study that observed 1.3°F in warming over the course of a decade in western Texas and attributed it to the construction of several large wind farms. But the researchers of that study noted that the warming they observed occurred only at night, and was simply the effect of warmer air—which generally settles higher than ground level during nighttime—getting chopped up by whirling turbines, with some of it coming down to ground level. As a result, this mechanism would not drive long-term climate change in the same way as the greenhouse effect—it would simply make the area immediately surround the turbines a bit warmer than otherwise, and air at higher altitudes a bit cooler. No revisions to the DEIR are needed.
The commenter compares current employment by DPR with that expected with the project and states that protecting and expanding existing employment opportunities would be wiser than adding the small number of jobs expected with the proposed project. The commenter also states that economic issues not addressed in the DEIR must be considered.

This comment does not raise specific questions or request information that pertains to the adequacy of the DEIR for addressing adverse physical impacts associated with the project. This comment is published in this Response to Comments document for public disclosure and for decision maker consideration. In addition, this DEIR is not intended to address social or economic impacts. “An economic or social change by itself shall not be considered a significant effect on the environment” (CEQA Guidelines Sections 15131 and 15382).

The commenter questions whether the changes to the landscape needed for the gen-tie would need a formal zoning change with the Department of Fire and Forestry.

The Department of Fire and Forestry does not regulate zoning within the County. This comment does not raise specific questions or request information that pertains to the adequacy of the DEIR for addressing adverse physical impacts associated with the project. This comment is published in this Response to Comments document for public disclosure and for decision maker consideration. No further response is required.

The commenter expresses the opinion that the project applicant and landowner of the gen-tie corridor land evaluate expected changes in vegetation densities and species and explain how the applicant intends to comply with Judge Alsop’s court order regarding PG&E power line vegetation management. The commenter further suggests that a well-designed corridor could provide positive changes to the ecology of the area.

Please see Master Response 10, “Wildfire,” of this FEIR, which discusses vegetation management.

The commenter believes that all materials used as part of the project should be recyclable.

Project decommissioning is discussed in Section 2.5, “Project Decommissioning and Restoration,” in Chapter 2, “Project Description,” of the DEIR. As stated in Section 2.5, upon decommissioning of the facility, the WTGs would be removed from the project site, and the materials would be reused or sold for scrap. No revisions to the language in the DEIR are necessary.

The commenter expresses the opinion that the turbines are visually strange and clash with the landscape.

Please see the responses to Comments R3-8, R3-9, R3-10, R3-18, and I149-1, which address the visual impacts of the project.

The commenter questions why the particular location was chosen for the proposed project, why not windy areas farther east and wonders about the cost difference associated with the two alternatives.

Please see Master Response 1, “Site Planning and Avoidance Measures,” for further information on the history and siting of the proposed project.
Regarding costs of the project, neither the DEIR nor this FEIR is intended to address social or economic impacts. “An economic or social change by itself shall not be considered a significant effect on the environment” (CEQA Guidelines Sections 15131 and 15382).
1223-1 The commenter’s choice is the preferred alternative reduced road and power line routes/preferred alternative reduced pads and turbines. The commenter expresses the opinion that the power line from Eel valley to Bridgeville is prohibited and would result in spread of invasive species and the use of herbicides.

This comment does not raise specific questions or request information that pertains to the adequacy of the DEIR for addressing adverse physical impacts associated with the project, nor does it contain an argument raising significant environmental issues. This comment is published in this Response to Comments document for public disclosure and for decision maker consideration.
The commenters strongly oppose the proposed project stating the opinion that the project is a waste of resources and would not solve energy consumption problems. The commenters also express the belief that the project poses health risks and would damage the ecosystem.

This comment is not directed at the adequacy of the DEIR, nor does it contain any questions regarding the CEQA analysis. This comment is published in this Response to Comments document for public disclosure and for decision maker consideration. No further response is required.
The commenter expresses the opinion that the trees that would be removed as part of the proposed project are the most efficient in carbon sequestration and states the belief that the DEIR has not calculated the carbon sequestration factor associated with the No Project alternative. The commenter further states the belief that carbon sequestration by trees and soil costs nothing, but that the proposed project would cost taxpayers millions of dollars in tax write offs. The commenter also expresses the opinion that the DEIR does not discuss potential effects of the project on Rockefeller Forest or the redwood trees along the Avenue of the Giants.

Please see Master Response 9, “Adequacy of the Greenhouse Gas Analysis,” for in-depth information regarding the adequacy of the greenhouse gas analysis, including an analysis of carbon sequestration, and results of additional modeling completed to substantiate the findings presented in the DEIR.

The commenter expresses the opinions related to taxes. This DEIR is not intended to address social or economic impacts. “An economic or social change by itself shall not be considered a significant effect on the environment” (CEQA Guidelines Sections 15131 and 15382).

There will be no impacts to trees along the Avenue of the Giants or in the Rockefeller Forest resulting from the proposed project; therefore, no such impacts are discussed in the DEIR.
I226-1 The commenter disagrees with the discussion in the DEIR that concludes that the proposed project would have no effect on recreation because Humboldt County residents and visitors enjoy recreation in the area.

The commenter provides an opinion on why the project would have no impact on recreation based on an unsupported assumption. No further revisions are required.

I226-2 The commenter expresses the opinion that the DEIR is incorrect in stating the water proposed for construction of the project would be obtained from treated wastewater generated by the Scotia Community Services District. The commenter states that this usage has not and will not be approved by the town and wonders where the water for the turbine footings would come from. The commenter also expresses opinions regarding erosion and sedimentation, construction related energy consumption, and sequestering of carbon by trees and other vegetation.

Water use required during construction and operation of the proposed project is discussed in Section 3.1.3, “Utilities,” of Chapter 3, “Environmental Setting, Impacts, and Mitigation Measures,” of the DEIR. Please also see the response to Letter S4, which addresses comments provided by the Scotia Community Services District.

Please see the responses to Comments I171-6 and I171-7, which address erosion and sediment discharge and erosion control.

Please see Master Response 9, “Adequacy of the Greenhouse Gas Analysis,” for in-depth information regarding the adequacy of the greenhouse gas analysis, including an analysis of carbon sequestration, and the results of the additional modeling completed to substantiate the findings presented in the DEIR.

I226-3 The commenter states the opinion that the DEIR fails to address the carbon that would be released as a result of removing trees and other flora and notes that the Nature Conservancy and others recommend halting deforestation.

Please see Master Response 9, “Adequacy of the Greenhouse Gas Analysis,” for in-depth information regarding the adequacy of the greenhouse gas analysis, including an analysis of carbon sequestration, and the results of the additional modelling completed to substantiate the findings presented in the DEIR.

I226-4 The commenter expresses the opinion that the ridges proposed for the WTGs are home to or part of the flyway for bats, the endangered marbled murrelet and many other birds that would be at risk of mortality due to the proposed turbines. The commenter further believes that the DEIR is inadequate in its information regarding mitigation for the expected loss of bird and bat species.

As described in Section 3.5, “Biological Resources,” the DEIR has provided a complete and thorough evaluation of all potentially affect wildlife species and committed the County to the required mitigation measures, has presented clear performance standards that have been further refined in this FEIR, and has described the means of mitigating impacts that would achieve the performance standards. Please also see
Master Responses 2 through 8 for additional detail related to the analysis of impacts on biological resources, a discussion on additional surveys conducted since circulation of the DEIR, and additional refinements to the mitigation measures in the DEIR.

I226-5 The commenter questions why off-site alternatives were not analyzed in the DEIR and states the opinion that other sites would be safer for birds and bats.

The commenter states the belief that other locations would result in less harm to birds and bats, but does not provide any specific sites for consideration. Please also see the response to Comment I171-10 regarding alternatives and Master Response 11, “Alternatives,” for information regarding alternatives that were considered in the EIR.

I226-6 The commenter expresses the opinion that vegetation surveys longer than one year are necessary and should focus on plants on CDFW’s watch list.

Please see Master Response 7, “Special-Status Plants and Sensitive Communities,” for information on previous surveys and the results of the work undertaken in 2019.

I226-7 The commenter expresses concern over the potential for fire as a result of the proposed project.

Section 3.13, “Fire Protection Services and Wildfire Hazards,” of the DEIR provides an analysis of wildfire impacts and Master Response 10, “Wildfire,” of this FEIR provides further discussion of the history of wildfire in the region and regulatory requirements and mitigation measures that reduce the potential for wildfires.

I226-8 The commenter notes the existence of studies that indicate that wind turbines can affect local climate and soils and questions how the turbines would affect the fog.

CEQA does not require a lead agency to conduct every test or perform all research, study, and experimentation recommended or demanded by commenters. In reviewing draft EIRs, persons and public agencies should focus on the sufficiency of the document in identifying and analyzing the possible impacts on the environment and ways in which the significant effects of the project might be avoided or mitigated (CEQA Guidelines Section 15204).

An EIR is not inadequate simply because experts in a particular environmental subject matter dispute the conclusions reached by the experts whose studies were used in drafting the EIR, even where different conclusions can reasonably be drawn from a single pool of information. (CEQA Guidelines Section 15151; Guide to the California Environmental Quality Act [CEQA] [Remy et al. 2007:499–500]; Greenebaum v. City of Los Angeles [1984] 153 Cal. App. 3d 391, 413.)

I226-9 The commenter expresses concern over siting the project on Bear River Ridge because the commenter believes that would compromise an area culturally important to the Wiyot Tribe. The commenter lists other sources of renewable energy that should be considered.

Please see the responses to Comments 148-1 and 148-2. Supplemental information regarding tribal cultural resources in the FEIR provides additional information based on site specific studies conducted
since circulation of the DEIR. Please also see the response to comment letter T2 for specific responses to comments submitted by the Wiyot Tribe.

Please also see the response to Comment I171-10 regarding alternatives and Master Response 11, “Alternatives,” for information regarding alternatives that were considered in the EIR.
The comment letter includes two questions regarding the proposed project: what is the effective lifespan of the project and what is the plan for project infrastructure after the project’s lifespan is over.

The project applicant proposes a 30-year life span for the WTGs. Please see the responses to Comments I145-1, I149-3, I171-9, and I176-3 related to the decommissioning of the proposed project. This comment does not raise specific questions or request information that pertains to the adequacy of the DEIR for addressing adverse physical impacts associated with the project, nor does it contain an argument raising significant environmental issues. This comment is published in this Response to Comments document for public disclosure and for decision maker consideration.
The commenter is concerned about infrasound generated by the wind turbines and questions what is proposed to ensure that the facilities won’t cause health problems. The commenter cites research to support infrasound can cause health problems.

This comment does not raise specific questions or request information that pertains to the adequacy of the DEIR for addressing adverse physical impacts associated with the project. This comment is published in this Response to Comments document for public disclosure and for decision maker consideration.

In addition, CEQA does not require a lead agency to conduct every test or perform all research, study, and experimentation recommended or demanded by commenters. In reviewing draft EIRs, persons and public agencies should focus on the sufficiency of the document in identifying and analyzing the possible impacts on the environment and ways in which the significant effects of the project might be avoided or mitigated (CEQA Guidelines Section 15204).

The commenter indicates that the DEIR provides no information regarding the impact on home and property values and believes the issue deserves more analysis.

This comment does not raise specific questions or request information that pertains to the adequacy of the DEIR for addressing adverse physical impacts associated with the project. This comment is published in this Response to Comments document for public disclosure and for decision maker consideration. In addition, this DEIR is not intended to address social or economic impacts. “An economic or social change by itself shall not be considered a significant effect on the environment” (CEQA Guidelines Sections 15131 and 15382).

The commenter questions the accuracy of the photographic representations and believes that the DEIR minimizes the visual impact of the turbines.

Please see the responses to Comments R3-8, R3-9, R3-10, R3-18, and I149-1, which address visual impacts.
I229-1 The commenter is opposed to the proposed project because there are too many unknown EIR factors and believes approval and comments are being sought before formal completion of the EIR.

The County believes that an adequate evaluation of impacts on all resources potentially affected by the proposed project has been completed. The DEIR addresses the full suite of environmental impacts resulting from implementation of the proposed project. Please see Sections 3.2, “Aesthetics”; 3.3, “Agricultural and Forestry Resources”; 3.4, “Air Quality”; 3.5, “Biological Resources”; 3.7, “Geology and Soils”; 3.8, “Greenhouse Gas Emissions”; 3.9, “Hazardous and Hazardous Materials”; 3.10, “Hydrology and Water Quality”; 3.11, “Noise”; and 3.12, “Transportation and Traffic” in the DEIR for an analysis of the project’s impact on these resources, and for specific mitigation measures related to impacts on these resources. Numerous technical studies were prepared and relied upon during preparation of the DEIR. Additional technical studies completed since circulation of the DEIR are included in Appendix B of this FEIR.

I229-2 The commenter questions the accuracy of the photo simulations and notes the absence of nighttime simulations. The commenter also expresses the opinion that the proposed plan to mitigate for bird mortality may not be adequate.

Please see the responses to Comments R3-8, R3-9, R3-10, R3-18, and I149-1, which address visual impacts.

As described in Section 3.5, “Biological Resources,” the DEIR has provided a complete and thorough evaluation of all potentially affect wildlife species and committed the County to the required mitigation measures, has presented clear performance standards that have been further refined in this FEIR, and has described the means of mitigating impacts that would achieve the performance standards. Please also see Master Responses 2 through 8 for additional detail related to the analysis of impacts on biological resources, a discussion on additional surveys conducted since circulation of the DEIR, and additional refinements to the mitigation measures in the DEIR.

I229-3 The commenter provides a list of other concerns, such as the potential for the proposed project to affect soil stability, damage to roadways, decommissioning plans, jobs, and tax revenues.

Please see the responses to Comments I229-1 and I229-2. Please also see the responses to Comments I145-1, I149-3, I171-9, and I176-3, related to the decommissioning of the proposed project. Please see the responses to Comments I171-6 and I188-2, which discuss geologic hazards. Please see the response to Comment I21-1 regarding energy generation and distribution. Section 3.12, “Transportation and Traffic,” in the DEIR analyzes the proposed project impacts on traffic, including specific impacts to local roadways during construction. Please also see the response to Comment I208-8.

With respect to jobs, taxes, and tourism, neither the DEIR nor this FEIR is intended to address social or economic impacts. “An economic or social change by itself shall not be considered a significant effect on the environment” (CEQA Guidelines Sections 15131 and 15382).
1230-1 The commenter believes that the energy produced by the proposed project would be sent to other parts of the state and states the opinion that there are more efficient, less destructive ways to generate power. The commenter also expresses the opinion that there were many issues left out of the DEIR.

Please see the response to Comment I21-1 regarding energy generation and distribution. In addition, the County believes that an adequate evaluation of impacts on all resources potentially affected by the proposed project has been completed. The DEIR addresses the full suite of environmental impacts resulting from implementation of the proposed project. Please see Sections 3.2, “Aesthetics”; 3.3, “Agricultural and Forestry Resources”; 3.4, “Air Quality”; 3.5, “Biological Resources”; 3.7, “Geology and Soils”; 3.8, “Greenhouse Gas Emissions”; 3.9, “Hazards and Hazardous Materials”; 3.10, “Hydrology and Water Quality”; 3.11, “Noise”; and 3.12, “Transportation and Traffic” in the DEIR for an analysis of the project’s impact on these resources, and for specific mitigation measures related to impacts on these resources. Numerous technical studies were prepared and relied upon during preparation of the DEIR. Additional technical studies completed since circulation of the DEIR are included in Appendix B of this FEIR.
I231-1 The commenter provides a number of general comments directed primarily to Chapter 1, “Introduction,” and Chapter 2, “Project Description,” of the DEIR. Many of the comments focus on visual impacts, but other comments express concern regarding the scale of the project and effects on tourism, air quality, local roads and Highway 101, and the Wiyot tribe.

Since circulation of the DEIR, the project applicant has refined the footprint of the proposed project, including reducing the number of turbines, to avoid or minimize impacts on sensitive resources. Please see Master Response 1, “Site Planning and Avoidance Measures,” and “Refinements to the Project Description Since Circulation of the DEIR” in Chapter 1 of this FEIR for the specific refinements that have been made to the project description since circulation of the DEIR.

Please see the responses to Comments R3-8, R3-9, R3-10, R3-18, and I149-1, which address visual impacts and lighting. Please see Section 3.4, “Air Quality,” of the DEIR and the response to Comment I208-3 regarding air quality. Please see the response to Comment I208-8 regarding impacts on local roadways and Highway 101. Please also see the response to comment letter T2 for specific responses to comments submitted by the Wiyot Tribe.

With regard to tourism, neither the DEIR nor this FEIR is intended to address social or economic impacts. “An economic or social change by itself shall not be considered a significant effect on the environment” (CEQA Guidelines Sections 15131 and 15382).

I231-2 The commenter expresses opinions regarding the project’s impacts on wildlife, including state fully protected species, including northern spotted owls, marbled murrelets, raptors, eagles, and bats, and states that the project affects condor reintroduction.

As described in Section 3.5, “Biological Resources,” the DEIR has provided a complete and thorough evaluation of all potentially affected wildlife species and committed the County to the required mitigation measures, presented clear performance standards that have been further refined in this FEIR, and described the means of mitigating impacts that would achieve the performance standards. Please also see Master Responses 2 through 8 for additional details related to the analysis of impacts on biological resources, a discussion of additional surveys conducted since circulation of the DEIR, and additional refinements to the mitigation measures in the DEIR. Please also see the response to Comment I65-1 regarding California condors.

I231-3 A long list of issues and information that the commenter believes have been left out of the DEIR is provided. Included on the list: turbine faceplate information, turbine locations and footprints; lack of eelgrass surveys; lack of surveys for fully-protected and common wildlife species; no Timber Harvest Plan for gen-tie corridor; no decommissioning data; no discussion of impacts on bridges, overpasses, and underpasses along Highway 101; no discussion on transportation impact on residents.

The County believes that an adequate evaluation of impacts on all resources potentially affected by the proposed project has been completed. The DEIR addresses the full suite of environmental impacts...
resulting from implementation of the proposed project. Please see Sections 3.2, “Aesthetics”; 3.3, “Agricultural and Forestry Resources”; 3.4, “Air Quality”; 3.5, “Biological Resources”; 3.7, “Geology and Soils”; 3.8, “Greenhouse Gas Emissions”; 3.9, “Hazards and Hazardous Materials”; 3.10, “Hydrology and Water Quality”; 3.11, “Noise”; and 3.12, “Transportation and Traffic” in the DEIR for an analysis of the project’s impact on these resources, and for specific mitigation measures related to impacts on these resources. Numerous technical studies were prepared and relied upon during preparation of the DEIR. Additional technical studies completed since circulation of the DEIR are included in Appendix B of this FEIR.

Please see the responses to Comments I145-1, I149-3, I171-9, and I176-3 related to the decommissioning of the proposed project. Please see the responses to Comments R3-8, R3-9, R3-10, R3-18, and I149-1, which address visual impacts and lighting. Please see the responses to Comments I121-1 and I123-1, which address noise and vibration. Please also see the response to Comment I208-8 regarding impacts on local roadways and Highway 101.

Please see “Refinements to the Project Description Since Circulation of the DEIR” in Chapter 1 of this FEIR for the specific refinements that have been made to the project description since circulation of the DEIR.

Since circulation of the DEIR, the applicant has completed additional technical studies, including eelgrass mapping. Please see Eelgrass Avoidance Recommendations for the Humboldt Wind Energy Project prepared by Merkel & Associates, Inc., June 2019, in Appendix B of this FEIR. The findings of the studies substantiate the impact conclusions made in the DEIR.

I231-4 The commenter expresses a number of concerns associated with the number of temporary workers.

The comment mischaracterizes the nature of construction activity because not all 300 laborers would be on site during a single phase of construction. Project construction is sequential in nature with distinct trades completing the tasks that are required for the next steps in the process. For instance, the initial stage involves land clearing and logging to create new and modify existing roads, establish turbine pads, and excavate foundations. Then the turbines are transported to the site by specialized moving teams where crews assemble and erect each turbine.

As noted in Section 3.1.2, “Population and Housing,” the project would not result in an increase in population that would induce new housing or displace existing housing stock. It is expected that specialized workers would typically travel to a project site and stay in the community temporarily until the job is complete. These workers would relocate to the next job site rather than residing in Humboldt County permanently once the job is completed. Also see Section 5.1.2, “Growth Inducing Impacts of the Project,” where the DEIR indicates some jobs may be filled by local labor force and notes that approximately 1,930 of the unemployed in Humboldt County are those involved in the construction trades.

I231-5 The commenter states that the impacts of maintenance activities were not described or addressed in the DEIR, including activities associated with turbine blade replacement, turbine annual oil changes, herbicide use on the gen-tie corridor, and operational solid waste. The commenter states that there is
deferred mitigation because the DEIR did not address secondary impacts associated with maintenance activities.

Please see the response to Comment I231-3. Maintenance activities are described in Section 2.4.1, Operations and Maintenance Plan,” in Chapter 2, “Project Description,” of the DEIR. As stated in Section 2.4.1, the project applicant would develop an O&M protocol to be implemented throughout the life of the project. The protocol would specify routine turbine maintenance and operation that would typically adhere to the maintenance requirements prescribed by the turbine manufacturer. O&M personnel would conduct maintenance activities for each wind turbine required by the routine schedule provided by the turbine supplier, or as required to keep the equipment in excellent operation.

In addition, the Reclamation, Revegetation, and Weed Control Plan, which is provided as Appendix B of this FEIR, does not explicitly prescribe which herbicides might be used, but notes that all treatment methods for control of weeds—including the use of herbicides—will be conducted in accordance with the law, regulations, and policies governing the land where the treatment will occur.

I231-6 The commenter makes statements regarding the physical effects expected as a result of the project and states that the loss of habitat for birds and bats would be significant not less than significant as concluded by the DEIR.

The commenter cites the acreage lost for each type of habitat identified in the DEIR but does not state why or how the loss of this acreage would result in a significant impact. Please also note that impact acreages have changed (been reduced) since circulation of the DEIR due to refinements in the project description. Please refer to Chapter 9 of this FEIR for updated language related to impact acreages in the biological resources section.

I231-7 The commenter lists a number of County General Plan policies and standards with which the commenter believes the project would conflict.

The commenter has identified numerous County General Plan policies and standards, but has not indicated how or why the project would conflict with these policies and standards. No revisions are necessary.

I231-8 The commenter expresses the opinion that the project would conflict with local Timber Production Zones and the HRC Habitat Conservation Plan.

Please see Master Response 8, “Conflict with Adopted HCP,” for a discussion of the project’s consistency with HRC’s HCP.

I231-9 The commenter expresses concern regarding landslides, slope stability, seismicity, and fire.

Please see the response to Comment I171-6, which discusses strong seismic ground shaking, slope stability, and landslide hazards.

Section 3.13, “Fire Protection Services and Wildfire Hazards,” of the DEIR provides an analysis of wildfire impacts and Master Response 10, “Wildfire,” of this FEIR provides further discussion of the
history of wildfire in the region and regulatory requirements and mitigation measures that can reduce the potential for wildfires.

I231-10 The commenter expresses opinions regarding how winter would affect construction of the proposed project and states there is no mention of how weather will impede the goal of completing the project by December 2020.

Weather is not a topic analyzed in the DEIR. The DEIR contains the full range of impact analyses required. No further revisions are necessary.

I231-11 The commenter references a wind energy advocacy group which the commenter indicates has provided information on turbine fires and expresses the opinion that the County would not be equipped to fight such fires. The commenter further states concerns over damage, presumably related to the project, to Highway 101 which, in the commenter’s opinion, would put CHP and motorists at daily risk for years.

Please see Section 3.13, “Fire Protection Services and Wildfire Hazards,” of the DEIR, which provides information related to firefighting capabilities and readiness. Please see the response to Comment I208-8 regarding impacts on local roadways and Highway 101.

I231-12 The commenter expresses the opinion that data on seismic risk and noise associated with the proposed turbines is not available, making modeling inapplicable and that modelling of wildlife is compromised by incomplete data and unsupported assumptions.

Please see the responses to Comments I231-2 and I231-3.

I231-13 The commenter believes that the DEIR doesn’t provide clear differences between alternatives’ effects on GHG emissions or fuel use. The commenter favors solar electricity over wind-generated power and cites a study related to temperature changes with each method to support their statement.

Please also the response to Comment I171-10 regarding alternatives and Master Response 11, “Alternatives,” for information regarding alternatives that were considered in the DEIR.

I231-14 The commenter makes a number of statements regarding CO2 and other GHG impacts in the DEIR, such as underestimation of fuel use, incomplete calculations, omission of effects of subcontractors, and amortization over 25 years.


I231-15 The commenter expresses the opinion that the DEIR was prepared in a hurry and that studies, engineering drawings and modelling are incomplete and should be complete simultaneously with preparation of the DEIR.

Please see Master Response 1, “Site Planning and Avoidance Measures,” for further information on the history and siting of the proposed project.
Where several measures are available to mitigate an impact, each should be discussed and the basis for selecting a particular measure should be identified. Mitigation measures may specify performance standards which would mitigate the significant effect of the project and which may be accomplished in more than one specified way. The specific details of a mitigation measure, however, may be developed after project approval when it is impractical or infeasible to include those details during the project’s environmental review provided that the agency (1) commits itself to the mitigation, (2) adopts specific performance standards the mitigation will achieve, and (3) identifies the type(s) of potential action(s) that can feasibly achieve that performance standard and that will considered, analyzed, and potentially incorporated in the mitigation measure. Compliance with a regulatory permit or other similar process may be identified as mitigation if compliance would result in implementation of measures that would be reasonably expected, based on substantial evidence in the record, to reduce the significant impact to the specified performance standards (Guidelines Section 15126.4)

The specific design of the mitigation can be permissibly deferred where mitigation is known to be feasible, but practical considerations prevent a lead agency from establishing specific standards early in the development process. Such deferral of the specific design of mitigation is permissible when the lead agency commits itself to devising mitigation measures that will satisfy specific performance standards for evaluating the efficacy of the measures and the project implementation is contingent upon the mitigation measures being in place (Oakland Heritage Alliance v. City of Oakland (2011) 195 Cal.App.4th 884; POET, LLC v. California Air Resources Board (2013) 218 Cal.App.4th 681, 735-738; Sacramento Old City Association v. City Council (1991) 229 Cal.App.3d 1011, 1028-1029).

I231-16 The commenter states the belief that the DEIR does not discuss certain species of special concern (e.g., bats) and provides no mitigation for impacts. The commenter further expresses opinions on mitigation sections being weak and frequent omissions of data and mitigation.

Please also see the response to Comment I231-15.

I231-17 The commenter expresses the opinion that the only take permits for State fully protected species are associated with research and livestock protection and states that the proposed project is neither.

Please see the responses to Comments I187-1 and I216-3.

I231-18 The commenter provides a summary of their comments and conclusions.

Please see the responses to Comments I231-1 through I231-17.
I232-1 The commenter is in support of the proposed project.

Support for the proposed project is noted. This comment does not raise specific questions or request information that pertains to the adequacy of the DEIR for addressing adverse physical impacts associated with the project, nor does it contain an argument raising significant environmental issues. This comment is published in this Response to Comments document for public disclosure and for decision maker consideration.
I233-1 *The commenter cites California Environmental Law Article 9, Contents of Environmental Impact Reports regarding the content of EIRs.*

The County believes that an adequate evaluation of impacts on all resources potentially affected by the proposed project has been completed. The DEIR addresses the full suite of environmental impacts resulting from implementation of the proposed project. Please see Sections 3.2, “Aesthetics”; 3.3, “Agricultural and Forestry Resources”; 3.4, “Air Quality”; 3.5, “Biological Resources”; 3.7, “Geology and Soils”; 3.8, “Greenhouse Gas Emissions”; 3.9, “Hazards and Hazardous Materials”; 3.10, “Hydrology and Water Quality”; 3.11, “Noise”; and 3.12, “Transportation and Traffic” in the DEIR for an analysis of the project’s impact on these resources, and for specific mitigation measures related to impacts on these resources. Numerous technical studies were prepared and relied upon during preparation of the DEIR. Additional technical studies completed since circulation of the DEIR are included in Appendix B of this FEIR.

I233-2 *The commenter cites NEPA regulations related to environmental impact statements.*

The EIR is not a federal document; therefore, NEPA regulations are not applicable to the proposed project. No further response is required.

I233-3 *The commenter states the opinion that credible studies regarding the effects of the proposed project must be undertaken and that industrial blight with negative impacts greater than what’s presented in the DEIR will be headed their way.*

The commenter provides an opinion that additional studies must be conducted but does not identify what types of studies. No further revisions to the DEIR are necessary.

I233-4 *The commenter expresses the opinion that impacts to birds would extend from Alaska to South America and that thousands of birds would be killed annually. The commenter also believes that Humboldt Bay sits along a migration corridor for raptors and other birds, and that the proposed project would have a greater turbine blade sweep per square mile than other wind power generators. The commenter provides articles to support their conclusions.*

CEQA does not require a lead agency to conduct every test or perform all research, study, and experimentation recommended or demanded by commenters. In reviewing draft EIRs, persons and public agencies should focus on the sufficiency of the document in identifying and analyzing the possible impacts on the environment and ways in which the significant effects of the project might be avoided or mitigated (CEQA Guidelines Section 15204).

An EIR is not inadequate simply because experts in a particular environmental subject matter dispute the conclusions reached by the experts whose studies were used in drafting the EIR, even where different conclusions can reasonably be drawn from a single pool of information. (CEQA Guidelines Section 15151; *Guide to the California Environmental Quality Act [CEQA]* [Remy et al. 2007:499–500]; *Greenebaum v. City of Los Angeles* [1984] 153 Cal. App. 3d 391, 413.) Perfection is not required, but the
EIR must be adequate, complete, and a good faith effort at full disclosure (CEQA Guidelines Section 15151). The DEIR for the proposed project provides an adequate, complete and good faith effort at full disclosure of the physical environmental impacts and the conclusions are based upon substantial evidence in light of the whole record.

I233-5 The commenter expresses the opinion that the wind energy industry’s research is nonscientific and isn’t credible; the commenter further believes that there is no comparisons of mortality associated with the proposed project relative to past wind projects. The commenter provides excerpts from studies to support their conclusions.

Please see the responses to Comments I233-5, I233-8, I233-9, and I233-10.

I233-6 The commenter believes that methodologies have been developed to miss obvious behaviors, that important data were available, but not recorded, and that data in the DEIR are not scientifically valid. The commenter also expresses the opinion that the radar studies are inaccurate and inadequate for assessing risk.

Please see the responses to Comments I233-5, I233-8, I233-9, and I233-10. Please also see Master Responses 2 through 8 for additional detail related to the analysis of impacts on biological resources, a discussion on additional surveys conducted since circulation of the DEIR, and additional refinements to the mitigation measures in the DEIR.

I233-7 The commenter expresses the opinion that the DEIR does not include research regarding nesting behavior of other bird species and activities of birds in the project area.

The commenter does not identify specific bird species excluded from the DEIR. As described in Section 3.5, “Biological Resources,” the DEIR has provided a complete and thorough evaluation of all potentially affect wildlife species and committed the County to the required mitigation measures, has presented clear performance standards that have been further refined in this FEIR, and has described the means of mitigating impacts that would achieve the performance standards. No further revisions are required.

I233-8 The commenter states the opinion that the EIR reports no spotted owl nests or include information regarding nesting behavior.

Please see Master Response 4, “Northern Spotted Owl,” which describes northern spotted owl survey methodology, surveys conducted since circulation of the DEIR, analysis of impacts on activity centers, and refined mitigation measures. In addition, since circulation of the DEIR, the applicant has revised the gen-tie alignment to completely avoid all northern spotted owl activity centers and to avoid nesting and roosting habitat to the maximum extent possible.

I233-9 The commenter expresses the opinion that the EIR contains information about the possibility of marbled murrelet habitat near the project site, but only helicopter surveys were undertaken, surveys that the commenter opines were poorly done.

Please see Master Response 2, “Marbled Murrelet,” which describes the results of the Humboldt Wind Energy Project Marbled Murrelet Radar Survey Report – Year 2. The full report is included in Appendix B of this FEIR.
The commenter believes that the eagle use surveys presented in the DEIR are not credible and that surveys avoided known golden eagle habitat in the project area. The commenter further expresses the opinion that raptor nest surveys should have included both ground and helicopter surveys, but the DEIR only reports aerial surveys which the commenter feels are not as accurate as ground surveys. The commenter also believes that the surveys that were undertaken were poorly done and thus, nests were missed.

Please see Master Response 6, “Eagles and Other Raptors,” for additional information on bird impacts and mitigation, refined since circulation of the DEIR.

The commenter expresses the opinion that the DEIR provides very little information on the travel routes of marbled murrelet, their nesting or behaviors that indicate nesting.

Please see the response to Comment I233-9 and Master Response 2, “Marbled Murrelet.”

The commenter states the belief that regional mortality studies are not scientific, accurate or credible.

Please see the response to Comment I233-5.
I234-1  The commenter believes that the EIR understates environmental impacts of the proposed project, but because of the seriousness of climate change, supports the project.

The commenter believes that the DEIR understates probable environmental impacts of the project, many of which they think cannot be mitigated. Nevertheless, as a scientist who understands the consequences of global warming, the commenter supports the project. This comment does not raise specific questions or request information that pertains to the adequacy of the DEIR for addressing adverse physical impacts associated with the project, nor does it contain an argument raising significant environmental issues. This comment is published in this Response to Comments document for public disclosure and for decision maker consideration.
1235-1  *The commenter believes the EIR fails to take adequate measures to avoid, minimize and compensate for impacts, such bird mortality.*

The commenter provides an opinion that poorly sited and developed wind energy projects cause dramatic environmental impacts, but neither identifies why he or she considers this specific project poorly sited nor suggests alternative layouts that would reduce impacts. Please see Master Response 1, which addresses project siting, planning, and design criteria.

As described in Section 3.5, “Biological Resources,” the DEIR has committed the County to the required mitigation measures, presented clear performance standards that have been refined in FEIR, and described the means of mitigating impacts that would achieve the performance standards.

Please also see Master Responses 2 through 8 for additional detail related to the analysis of impacts on biological resources, a discussion on additional surveys conducted since circulation of the DEIR, and additional refinements to the mitigation measures in the DEIR.

In addition, the project applicant has refined the footprint of the proposed project to avoid or minimize impacts on sensitive resources since circulation of the DEIR. Please see “Refinements to the Project Description Since Circulation of the DEIR” in Chapter 1 of this FEIR for the specific refinements that have been made to the project description since circulation of the DEIR.
The commenter, with 29 years of experience in the renewable energy field, is in support of the proposed project and notes that the benefits greatly outweigh the costs. The commenter further expresses the opinion that rooftop solar isn’t a reasonable alternative.

Support for the proposed project is noted. This comment does not raise specific questions or request information that pertains to the adequacy of the DEIR for addressing adverse physical impacts associated with the project, nor does it contain an argument raising significant environmental issues. This comment is published in this Response to Comments document for public disclosure and for decision maker consideration.
I237-1  *The commenter is opposed to the proposed project and expresses the opinion that the only purpose of the project is financial gain for an out of town developer.*

This comment does not raise specific questions or request information that pertains to the adequacy of the DEIR for addressing adverse physical impacts associated with the project, nor does it contain an argument raising significant environmental issues. This comment is published in this Response to Comments document for public disclosure and for decision maker consideration.

The commenter expresses the opinion that the project would provide financial gain for the applicant. this DEIR is not intended to address social or economic impacts. “An economic or social change by itself shall not be considered a significant effect on the environment” (CEQA Guidelines Sections 15131 and 15382).
I238-1 The commenter expresses the opinion that the DEIR is inadequate in providing information regarding geologic hazards and fails to comply with County policy and standards, such as erosion and sediment control measures, geologic report requirements, landslide maps. The commenter further states the opinion that the DEIR must be revised to incorporate additional mitigation measures to reduce impacts below the level of significance.

The County believes that an adequate evaluation of impacts on all resources potentially affected by the proposed project has been completed. The DEIR addresses the full suite of environmental impacts resulting from implementation of the proposed project. Please see Sections 3.2, “Aesthetics”; 3.3, “Agricultural and Forestry Resources”; 3.4, “Air Quality”; 3.5, “Biological Resources”; 3.7, “Geology and Soils”; 3.8, “Greenhouse Gas Emissions”; 3.9, “Hazards and Hazardous Materials”; 3.10, “Hydrology and Water Quality”; 3.11, “Noise”; and 3.12, “Transportation and Traffic” in the DEIR for an analysis of the project’s impact on these resources, and for specific mitigation measures related to impacts on these resources. Numerous technical studies were prepared and relied upon during preparation of the DEIR. Additional technical studies completed since circulation of the DEIR are included in Appendix B of this FEIR.

Please see the responses to Comments I171-6, I171-7, and I188-2, which address geologic hazards. Please also see Master Responses 2 through 8 for additional detail related to the analysis of impacts on biological resources, a discussion on additional surveys conducted since circulation of the DEIR, and additional refinements to the mitigation measures in the DEIR.

In addition, the project applicant has refined the footprint of the proposed project to avoid or minimize impacts on sensitive resources since circulation of the DEIR. Please see Master Response 1, “Site Planning and Avoidance Measures,” and “Refinements to the Project Description Since Circulation of the DEIR” in Chapter 1 of this FEIR for the specific refinements that have been made to the project description since circulation of the DEIR.
I239-1  This letter transmits a copy of comments sent to the County Board of Supervisors and also includes two questions: the impact of noise generated by the wind turbines on tourists and effect of a reduction in taxes to the County if property is reassessed. The letter to the Board also expresses concern regarding noise, as well as clear cutting of forest that the commenter believes would force wildlife into camp grounds and residential areas. The commenter further expresses concern regarding fire risks and states the opinion that the existing proposal lacks specifics on the effects of the project on tourism.

Please see the responses to Comments I121-1 and I123-1, which address noise and vibration associated with the project. Section 3.13, “Fire Protection Services and Wildfire Hazards,” of the DEIR provides an analysis of wildfire impacts and Master Response 10, “Wildfire,” of this FEIR provides further discussion of the history of wildfire in the region and regulatory requirements and mitigation measures that can reduce the potential for wildfires.

With respect to taxes and tourism, neither the DEIR nor this FEIR is intended to address social or economic impacts. “An economic or social change by itself shall not be considered a significant effect on the environment” (CEQA Guidelines Sections 15131 and 15382).
I240-1  The commenter believes the EIR fails to take adequate measures to avoid, minimize and compensate for impacts, such bird mortality.

Please see response to comment I235-1.
The commenter is opposed to the proposed project and expresses the opinion that the DEIR leaves many unanswered questions and that there are too many potential ecological consequences.

The County believes that an adequate evaluation of impacts on all resources potentially affected by the proposed project has been completed. The DEIR addresses the full suite of environmental impacts resulting from implementation of the proposed project. Please see Sections 3.2, “Aesthetics”; 3.3, “Agricultural and Forestry Resources”; 3.4, “Air Quality”; 3.5, “Biological Resources”; 3.7, “Geology and Soils”; 3.8, “Greenhouse Gas Emissions”; 3.9, “Hazards and Hazardous Materials”; 3.10, “Hydrology and Water Quality”; 3.11, “Noise”; and 3.12, “Transportation and Traffic” in the DEIR for an analysis of the project’s impact on these resources, and for specific mitigation measures related to impacts on these resources. Numerous technical studies were prepared and relied upon during preparation of the DEIR. Additional technical studies completed since circulation of the DEIR are included in Appendix B of this FEIR.
The commenter is in support of the proposed project and expresses the opinion that the energy generated would replace that associated with decommissioned hydroelectric projects. The commenter further states the belief that the project would diversify industry and strengthen the overall structure of the local community, generating tax revenue and reducing greenhouse gas emissions.

Support for the proposed project is noted. This comment does not raise specific questions or request information that pertains to the adequacy of the DEIR for addressing adverse physical impacts associated with the project, nor does it contain an argument raising significant environmental issues. This comment is published in this Response to Comments document for public disclosure and for decision maker consideration.
The commenter is opposed to the proposed project and expresses the opinion that unintended risks, such as destruction of land during construction, bird, bat and wildlife mortality, greatly outweigh the benefits.

This comment does not raise specific questions or request information that pertains to the adequacy of the DEIR for addressing adverse physical impacts associated with the project, nor does it contain an argument raising significant environmental issues. This comment is published in this Response to Comments document for public disclosure and for decision maker consideration.
1244-1 The commenter believes that the proposed project is poorly sited and could have tremendous negative local impacts. The commenter expresses the opinion that the project would likely adversely affect protected species and that there should be additional measures to avoid or minimize impacts and that there should be compensation for impacts to local residents. The commenter also suggests incorporating curtailment during high risk periods, incorporation of deterrence technology and an adaptive management program to monitor and minimize impacts.

Please see Master Response 1, “Site Planning and Avoidance Measures,” for further information on the history and siting of the proposed project. In addition, the project applicant has refined the footprint of the proposed project to avoid or minimize impacts on sensitive resources since circulation of the DEIR; please see “Refinements to the Project Description Since Circulation of the DEIR” in Chapter 1 of this FEIR for details.

The DEIR includes adaptive management approaches as an important element of management and minimization of project impacts on birds and bats. See Mitigation Measure 3.5-2b (Conduct Postconstruction Mortality Monitoring for Marbled Murrelets and Other Species); Mitigation Measure 3.5-5b f(Conduct Postconstruction Mortality Monitoring for Eagles); Mitigation Measure 3.5-7 (Avoid, Minimize, and Compensate for Construction Impacts on Northern Spotted Owl); Mitigation Measure 3.5-14 (Avoid and Minimize Operational Impacts on Nonraptor Birds); Mitigation Measure 3.5-18b (Conduct Bat Surveys and Mortality Monitoring); and Mitigation Measure 3.5-18d (Implement Operational Minimization Measures and Mitigation). Several of these measures have been further refined in this FEIR, based on additional data provided by new and updated technical studies. Please see, “Biological Resources,” in Chapter 9, and “Refinements to the Project Description Since Circulation of the DEIR,” in Chapter 1 of this FEIR for specific refinements to mitigation measures.

1244-2 The commenter states that the project could be “significantly” improved and reduce local impacts with proper siting and operational techniques.

Please see the response to Comment 1244-1.
8b  FORM LETTER A COMMENTS AND RESPONSES

This chapter provides responses to significant environmental issues raised in the comment letters on the draft environmental impact report (DEIR) for the Humboldt Wind Energy Project received from individuals, as required by California Environmental Quality Act (CEQA) Guidelines Section 15132.

FORM A COMMENTERS

The commenters listed in Table 8b-1 submitted similarly worded letters expressing their concerns about the project. Form Letter A is reproduced in Appendix A. The County’s response to these comments is provided following the list of Form Letter A commenters.

Table 8b-1. Form Letter A Commenters

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A1-1  The commenter expresses the opinion that poorly sited and developed wind projects can cause dramatic environmental impacts.

The commenter provides an opinion that poorly sited and developed wind energy projects cause dramatic environmental impacts, but neither identifies why he or she considers this specific project poorly sited nor suggests alternative layouts that would reduce impacts. Please see Master Response 1, which addresses project siting, planning, and design criteria.

This comment is not directed at the adequacy of the DEIR, nor does it contain an argument raising significant environmental issues. The comment is published in this FEIR is for decision maker consideration. No further response is required.

A1-2  The commenter states that the DEIR indicates the proposed project is likely to result in death of numerous special-status species, such as the marbled murrelet, and may cause population-level impacts to once-numerous species, such as the hoary bat. The commenter states that the DEIR must be revised to incorporate additional mitigation measures to reduce impacts below a level of significance, including proper siting of wind turbines to avoid impacts, operational curtailments during high-risk periods, and incorporation of deterrence technologies. In addition, the commenter states that the County needs to insist on a robust and meaningful adaptive management program to continue to monitor and minimize impacts throughout the life of the project.

As described in Section 3.5, “Biological Resources,” the DEIR has committed the County to the required mitigation measures, presented clear performance standards that have been refined in FEIR, and described means of mitigating impacts that would achieve the performance standards.

The DEIR includes adaptive management approaches as an important element of management and minimization of project impacts on birds and bats. Please see Mitigation Measure 3.5-2b (Conduct Postconstruction Mortality Monitoring for Marbled Murrelets and Other Species); Mitigation Measure 3.5-5b (Conduct Postconstruction Mortality Monitoring for Eagles); Mitigation Measure 3.5-7 (Avoid, Minimize, and Compensate for Construction Impacts on Northern Spotted Owl); Mitigation Measure 3.5-14 (Avoid and Minimize Operational Impacts on Nonraptor Birds); Mitigation Measure 3.5-18b (Conduct Bat Surveys and Mortality Monitoring); and Mitigation Measure 3.5-18d (Implement Operational Minimization Measures and Mitigation). Several of these measures have been further refined in this FEIR, based on additional data provided by new and updated technical studies. Please see Chapter 9 “Revisions to the DEIR” in this FEIR for specific refinements to mitigation measures.

In addition, the project applicant has refined the footprint of the proposed project to avoid or minimize impacts on sensitive resources since circulation of the DEIR. Please see Chapter 1 of this FEIR for specific refinements to the project description since circulation of the DEIR. Additional technical studies that were completed since circulation of the DEIR are included in Appendix B of this FEIR and updated project maps are included in Appendix C of this FEIR.
Please also see Master Response 1, “Site Planning and Avoidance Measures,” for a summary of project siting, planning, and design criteria, including siting criteria considered to avoid and minimize impacts on marbled murrelets.

Master Response 2, “Marbled Murrelet,” provides updated marbled murrelet survey results and additional information on the proposed mitigation measures for marbled murrelets.

Master Response 4, “Bats,” provides additional information on the analysis of operational impacts on bats, and on proposed avoidance, minimization, and mitigation measures for project impacts on bats.