

May 26, 2019

Elizabeth Burks, Senior Planner
County of Humboldt Planning & Building Department
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Dear Ms. Burks:

This letter contains my comments on the Humboldt Wind LLC (HWLLC) DEIR. In addition to the comments relating to the CEQA analysis of the DEIR I am also including comments that I, as a resident, taxpayer and property owner in Humboldt County, would like explained as related to this project.

I would like financial information on the project to determine its feasibility. If the project is approved how much will the infrastructure cost to build including site preparation? In dollars what will be the yearly income to from selling the power generated into the grid? In dollars what is the tax revenue Humboldt County expects to have generated by the project? I understand that a bond is being required to assure proper decommissioning of the project at the end of its 30 year expected life. How much in dollar value is the face value of the bond and what insurance carrier is underwriting the bond? How much liability insurance is the developer carrying and what company is the underwriter? How much in dollar value is HWLLC expecting from the Federal subsidies that are set to expire in 2020? What other financial guarantees is the County requiring of HWLLC?

I32-1

Before delving into specifics please note that I favor the “No Project.” Alternative. Although I favor investment in renewable energy sources such as distributed photovoltaic solar power with rooftop residential applications sending power into the grid I do understand that larger projects are required to satisfy our power needs. However, this particular project, sited in a remote and relatively undeveloped location in a heavily forested area home to endangered species is highly unsuitable for Humboldt County. Large industrial-size installations are appropriate for locations such as the Altamont Hills in the Bay Area or Tehachapi Pass but one of the key assets of Humboldt County both to its residents and to its tourist industry is its natural beauty. This project does not seem to offer Humboldt County any direct benefit significant enough to compensate for the destruction that will result from construction of this project.

I32-2

► Aesthetics

I32-3

The project has a huge aesthetic effect that cannot be minimized and/or mitigated except by electing the “No Project” alternative. The aesthetic effects are significant and unavoidable and affect the property values of residents and will have impact on the tourist industry that is one of the County’s leading economic drivers.

The examples given in the document are poorly crafted to enable readers to gain a true understanding of the aesthetic impact. It may be my eyesight or my computer’s ability to register the almost invisible depictions of the wind turbine generators (WTGs) in the “before and after” photography starting with Figure 3.2-3 from KOP2. This same problem is found in the rest of the Figures. The choice of observations point should also be challenged.

The WTGs that have been superimposed on the photograph are so faint as to be invisible unless you are looking carefully – it almost appears that the WTGs are “invisible.” This is highly deceptive. I strongly doubt that in reality the WTGs would appear so faint as to be hardly discernable.

The choice of the KOP’s is also questionable. As the developer (or author) states: “The selection of a location as a KOP does not mean that it is the best viewpoint in the area, or that other locations in the area would not have different views.” This is the very point. The views given from the KOPs selected should be called into question. It would be logical to present the least disruptive views. This may be the intention of the developer. If so, the project should be immediately given the “No Project” alternative and no Conditional Use Permit (CUP) should be issued.

The various alternatives for shifting around the WTGs from one Ridge to another or reducing the number of WTGs or making them larger are not realistic alternatives since the energy production would not sustain the project.

► Agriculture and forestry resources

The effects on Agriculture do not appear too significant, as few of the affected parcels are AE. But the effect on forest resources is highly significant. It appears the majority of affected parcels belong to Humboldt Redwoods Company (HRC). It is obviously in HRC’s interest to enable as much timber harvesting as allowed under law. If this project is developed an equivalent of 836 acres of forest will be harvested. It is unclear if this number also includes the cutting of 17 access roads to a width of 50 feet as well as the 25 miles of Gen-Tie line to Bridgeville with a corridor cleared to 100 feet in width. 91 acres would be permanently removed from forestland.

The developer’s assessment of the impact is “less than significant”

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(Cont.)

132-4

based upon the acreage of the land to be harvested vs. the total acreage of forested land in the County. However, this equation does not capture the importance of this area as it is adjacent or close to areas inhabited by endangered species. A major disturbance of the land involving a large human presence, loud machines such as chain saws, loaders logging trucks, etc. is most significant to these species. These impacts are discussed further in the Biological resources section. Another impact is the significance of the amount of Green House Gases (GHGs) that will be released in the logging phase and the loss of GHG-capture that would have occurred had the trees been left to mature for the normal pattern of harvesting. There is no calculation of GHGs to be released nor loss of GHG-capture – thus for this important measurement we are left to assume that there will be a significant impact with no minimization or mitigation offered. This is also covered in the Greenhouse gas emissions section. The developer’s assumption that it “would apply for the applicable timber harvest document, and CAL FIRE would ensure that the timber harvest is done in accordance with the Forest Practice Rules and all industry standards” does not eliminate these concerns.

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(Cont.)

► Biological resources

The “No Project” alternative should be selected for this project and no CUP issued for the simple reason that the site is not appropriate for an industrial-level installation – particularly for a wind farm. Yes, there is wind but of all the locations available in the State of California the site chosen for this project has the greatest number of State Species of Concern and is one of the few locations in the state for the highly endangered marbled murrelet (MAMU) and northern spotted owl (NSO). In fact, the developer could not have found a better site if it was deliberately intending to eliminate these threatened species that also include the willow flycatcher, western yellow billed cuckoo and bald eagle.

In addition to birds killed by actual collisions with WTGs and guy lines, it is the removal, degradation and/or fragmentation of habitat and disturbances to wildlife via light, noise, vibration and other impacts from construction and operation of the project that pose significant and irreparable impacts that warrant a “No Project” decision.

132-5

Below is a list of impacts to wildlife taken from the HWLLC document. Please excuse my inability to format this list correctly. The point I am making is that this is an extensive and unacceptable list of impacts to wildlife most of which are highly – as opposed to potentially significant. The impacts that are characterized as “potentially significant” will be lethal if the project is approved. Once a creature is killed these impacts cannot be mitigated or minimized. With a list this long and with endangered species involved it can only be concluded that the “No Project” alternative is the appropriate choice.

Humboldt County

POTENTIAL IMPACTS — BIRDS

IMPACT 3.5-1	Construction Impacts on Marbled Murrelet Nesting. Construction of the proposed project could impact marbled murrelet nesting activity if construction activity were to cause disturbance at the nesting sites, thereby reducing adults' nest attentiveness and nest productivity. This impact would be potentially significant.
IMPACT 3.5-2	Operational Impacts on Marbled Murrelet. Operation of the proposed project could result in impacts on marbled murrelet, as a result of collisions with project components such as wind turbine generator towers. This impact would be potentially significant.
IMPACT 3.5-3	Construction Impacts on Bald and Golden Eagle Nesting Activity. Construction of the proposed project could impact bald and golden eagle nest success if active nests were directly affected, or if construction activities occurred near nesting sites, thereby reducing adults' nest attentiveness and nest productivity. This impact would be potentially significant.
IMPACT 3.5-4	Construction Impacts on Bald and Golden Eagle Foraging and Nesting Habitat. Construction activities could remove or degrade the quality of suitable bald and golden eagle foraging habitat. This impact would be potentially significant.
IMPACT 3.5-5	Operational Impacts on Bald and Golden Eagles. Operation of the WTGs would pose a risk to bald and golden eagles. This impact would be potentially significant.
IMPACT 3.5-6	Disturbance of Roosting and Nesting Northern Spotted Owls by Construction Activities. Construction activities could increase stress levels in owls during daytime roosting/nesting periods, leading to nest abandonment. This impact would be potentially significant.
IMPACT 3.5-7	Removal, Fragmentation, and Modification of Northern Spotted Owl Habitat during Construction. Construction of access roads, the gen-tie, and other project facilities would result in disturbance of 546.8 acres of forested northern spotted owl habitat (approximately 457.1 acres of temporary and 89.7 acres of permanent impact). This impact would be potentially significant.
IMPACT 3.5-8	Operational Impacts on Northern Spotted Owls. Northern spotted owls that cross the road through the generator zone as a matter of foraging habit, or during dispersal by young birds, have the potential to be struck by WTG blades. This impact would be potentially significant.
IMPACT 3.5-9	Construction Impacts on Nesting Raptors. Project construction could directly or indirectly impact nesting raptors. This impact would be potentially significant.
IMPACT 3.5-10	Removal and Modification of Special-Status Raptor Nesting and Foraging Habitat during Construction. Construction of access roads, the gen-tie, and other project facilities would result in up to 546.8 acres of forested northern spotted owl habitat (approximately 457.1 acres of temporary and 89.7 acres of permanent impact). This impact would be potentially significant.

..	of impacts (approximately 729.5 acres of temporary impacts and 132.6 acres of permanent nesting and foraging habitat for special-status raptor species. This impact would be less than significant.
IMPACT 3.5-11	Operational Impacts on Raptors. Operation of the proposed project could result in mortality of raptors as a result of collisions with wind turbine generators and electrical transmission lines. This impact would be less than significant.
IMPACT 3.5-12	Construction Impacts on Avian Foraging and Nesting Habitat. Construction activities associated with the proposed project infrastructure, including wind turbine generators and pads, the substations, and the generation tie, resulting in removal of forest, woodland, grassland, and riparian habitat would result in loss of nesting, foraging, and migratory stopover habitat for special-status birds. This impact would be less than significant.
IMPACT 3.5-13	Construction Impacts on Nesting Birds. Construction of the proposed project could affect nesting birds if nests were to be directly affected or if construction activity were to cause disturbance at nesting sites, resulting in adults' nest attentiveness and nest productivity. This impact would be potentially significant.
IMPACT 3.5-14	Operational Impacts on Nonraptor Birds. Operation of the proposed project could result in mortality of nonraptor birds, as birds could collide with or be electrocuted by project components such as wind turbine towers and electrical transmission lines. This impact would be potentially significant.

BATS

IMPACT 3.5-15	Construction Impacts on Bat Maternity Roosts or Hibernacula and Loss of Essential Roost Habitat. Construction of the proposed project could result in mortality of and injury to bats, including special-status species, and removal of essential bat roost habitat. This impact would be potentially significant.
IMPACT 3.5-16	Construction Disturbance of Bachelor Groups, Migratory Roosts, or Solitary Bats. Construction of the proposed project could result in mortality, displacement, and disturbance of bachelor groups, migratory roosts, and solitary bats, including special-status species. This impact would be less than significant.
IMPACT 3.5-18	Operational Impacts on Bats. Operation of the proposed project could result in mortality of bats, including special-status bat species, as a result of interaction with wind turbine towers and electrical transmission lines. This impact would be potentially significant.

MAMMALS

IMPACT 3.5-19	Construction Impacts on Special-Status Mammals. Grading and clearing activities, footcandle lighting, and equipment operations associated with preparation of staging areas, construction of access roads, and other activities associated with construction of the proposed project would result in disturbance of special-status wildlife, including the potential for direct mortality of special-status mammals.
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	would be potentially significant.
IMPACT 3.5-20	Operational Impacts on Special-Status Mammals. The potential exists for special-status r project area during project operation to be struck by vehicles. However, this impact woul

REPTILES & AMPHIBIANS
FISH

IMPACT 3.5-21	Construction Impacts on Special-Status Amphibians and Reptiles. Grading, clearing, hor and other activities associated with project construction could result in direct and indirect amphibian and reptile species and their habitat. This impact would be potentially signific
IMPACT 3.5-22	Impacts of Project Construction on Special-Status Fish. Grading, clearing, horizontal dir activities associated with project construction could result in indirect impacts on special-habitat from project runoff and sedimentation. This impact would be potentially significa

PLANTS
HABITAT
WETLANDS
MIGRATORY CORRIDORS AND NURSURY SITES

IMPACT 3.5-23	Impacts on Special-Status Plants during Project Construction and Operation. Grading, cl associated with construction and operation of the proposed project would result in loss ar status plant species present in the project footprint. This impact would be potentially sign
IMPACT 3.5-24	Loss or Disturbance of Sensitive Natural Communities and Riparian Habitat. Grading, cl associated with construction and operation of the proposed project would result in substa sensitive natural communities and riparian habitat. This impact would be potentially sign
IMPACT 3.5-25	Disturbance and Loss of Wetlands and Other Waters during Project Construction. Gradir activities associated with construction and operation of the proposed project would result wetlands and other waters. This impact would be potentially significant.
IMPACT 3.5-26	Impacts on Migratory Corridors during Project Construction and Operation. Constructior would result in the loss of relatively small amounts of land area, such that the project site undeveloped. Project infrastructure would not impede movement by birds, bats, and terre operation would consist of activities that are similar to other land uses in the area. This ir significant.
IMPACT 3.5-27	Impacts on Nursery Sites. Construction of the proposed project would avoid colonial birc would avoid and minimize impacts on bat nursery roost sites. The project site would rem project operation would not result in additional impacts on suitable nursery sites. This im significant.

INCONSISTENT WITH HUMBOLDT REDWOOD HABITAT CONSERVATION PLAN

<p>IMPACT 3.5-28 "</p>	<p>Potential Inconsistency with the Humboldt Redwood Company Habitat Conservation Plan project construction phase is inconsistent with the provisions of the Humboldt Redwood impact would be potentially significant.</p>
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► Cultural resources, including tribal cultural resources

As a result of consultation with the Wiyot tribe, the tribe does see the Bear River Ridge as a sacred high place that remains visible throughout Wiyot territory. Constructing WTGs on Bear River Ridge would be a significant visual impact on this sacred high place. No feasible mitigation is available to reduce this significant impact; therefore, this impact would be significant and unavoidable given the available alternatives that will not produce the energy that is the project's raison d'être. The Bear River tribe was also consulted but it is unclear from the document what was the tribe's position. Nevertheless, there should be no desecration of this sacred place. The "No Project" alternative should be selected and no CUP issued.

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► Energy

This project will only provide 0.0033 of California's renewable power generation. In addition there will be much wastage via the distance to the transmission facility – almost 10% of the power produced will be wasted in transmission because this project is being sited so far from a transmission facility. The Bridgeville facility sends power to the grid not directly to Humboldt County users.. Thus the majority of any "green power" used in Humboldt County will not be produced locally but will have to be purchased from the grid.

132-7

► Greenhouse gas emissions

The project proposes to displace 372,000 metric tons of CO2 per year that would otherwise be required to generate 155MW with natural gas. However, the front-loading of the GHGs generated from the construction phase offsets these gains as the developer has amortized the GHGs from project construction over 25 years. Again this is deception. GHGs cannot be amortized – they are incurred immediately and they have a significant impact for which no mitigations and/or minimization is being offered.

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HWLLC amortizes energy use/GHG emissions over 25 years so that it compares favorably with energy output and with fossil-generated power. However, the construction and operations emissions impact receptors in real time.



HWLLC divides the emissions from the construction by 25, amortizing them over the life of the project, and then contrasts those that would be emitted from a natural gas plant generating similar power. Same with O&M, but that's different, since those emissions are in fact associated with ongoing operations. But the construction emissions happen within the 18 months and impact everything now. HWLLC rationalizes that by claiming that pollutants have a 15-year life span, therefore their effects should be amortized, but that just translates into acute and chronic impacts. It's front-loading.

As of June 2017, the renewable energy capacity from solar, wind, geothermal, small hydropower, and biomass power plants was 27,500MW. The proposed project would add an additional 155MW/135MW, but this would be an increase of only about one-half of 1 percent.

Given the environmental impacts to endangered species, forestlands, property values and scenic blight this project should be given the "no Project" alternative and no CUP. Even if 15 permanent jobs are promised the project does not sufficiently benefit Humboldt County or its residents given the cost.

► Transportation and traffic

If the project is approved the construction process will create a traffic and emissions nightmare. A total of 9,673 truck trips can be anticipated including trucks that could weight up to 110 tons and could be up to 90 feet long to haul the WTG parts. Bridges and portions of the Highway will either have to be bypassed or re-constructed. To assume that these activities will only be happening during nights or weekends is unrealistic. Trucks hauling water, sand, rock and cement to the site from around the County will cause an unacceptable level of congestions on Highway 101. There is not realistic estimate of the length of project construction that I could easily find in the document but the duration of the construction will have to span at least six month minimum, a period of time guaranteed to produce furious commuters – particularly between Fortuna and Eureka.

In conclusion, the project is unacceptable. The "No Project" alternative should be selected and CUP issued. In a nutshell here is a summation of the real (not potential) project impacts:

Terra-Gen will be harming or killing some of the iconic species that make this place wild, including marbled murrelets, bald and golden eagles, peregrine falcons, kites, and an array of other birds, mammals, amphibians and reptiles.

The constant audible and inaudible noise, the microclimate effects of changing wind patterns, the vibratory energy of 600-foot towers with 250-foot blades rotating around 200 miles per hour, each lubricated with 400 gallons of oil, on bases of concrete 65 feet in diameter and 10 feet into the

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132-10

ground, on 350-foot squares of scraped ground, 3 million cubic feet of soil displaced, constant human activity for 30 years along the 17 miles of new permanent roads, some 200 feet wide, up the Jordan Creek watershed which is already impaired by Maxxam's landslides, 25 miles of 100 ft wide corridors snaking thru forestland and kept clear with herbicides to support transmission lines 60 feet in the air, carrying 155 megawatts (135 as losses occur along the way), and construction activity using 15,000 gallons of precious water a day, 10,000 truck trips, some weighing 110 tons and 90 feet long, over 11,000 yards of concrete from batch plants, all activities fueled, from mining to twirling, with fossil fuel energy, all blighting one of the North Coast's last great ridge-top meadow ecosystems.

Rushing to promote this project for the benefit of the developer and whatever other financial interests are at play here is a crime against nature and will alter the character of Humboldt County to an unacceptable degree.

Very truly yours, Barbara Kennedy
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I32-10
(Cont.)

From: Barbara Kennedy <bkenn202@att.net>
Sent: Tuesday, May 21, 2019 3:44 PM
To: CEQAResponses <CEQAResponses@co.humboldt.ca.us>
Subject: Humboldt Wind LLC - Terra-Gen Project

Why do responses via email have to be in Microsoft format? Many of us have MAC/Apple computers - why would their format not be acceptable - they are interchangeable. Please respond - if I submit my comments from an Apple computer will they be discarded? If so this is unreasonable and Microsoft is not required by CEQA. Please respond. Thank you. Barbara Kennedy, P.O. Box 29, Weott, CA 95571