

To the Humboldt Wind Energy Project Planner
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County of Humboldt Planning Department
3015 H Street
Eureka, CA 95501

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Regarding: Humboldt Wind Energy Project

We have read the draft Environmental Impact Statement and have serious concerns about the environmental impacts of a wind farm in this location. While we support reducing our reliance on fossil fuels, this is not a good place for a wind farm. There are many other windy locations that would be more appropriate for this type of development.

187-1

Our areas of professional expertise are geology, soils, erosion and sedimentation, slope stability, water resources and hydrology.

The geology and soils section and the hydrology and water quality sections of the DEIS do not adequately address the impacts of road and power line (and similar infrastructure) construction and maintenance. The DEIS notes that the roads will be constructed on potentially unstable steep slopes, and cross numerous flow courses. While road construction regulations, guidelines and BMPs can reduce impacts, the intense storms and seismic events that frequent this region can and often do ruin even the best-engineered roads. Critical details of road location and geomorphology are not included. Long term road maintenance is not adequately addressed, and will be an on-going issue with both on and off site impacts. There is no discussion of the potential of large seismic events and the impacts on roads, especially if the event occurs during the wet season. The site may become inaccessible for long periods of time (due to either storms or earthquakes), which would limit the ability to perform preventive wet season maintenance on the roads built on these inherently unstable slopes, crossing many flow courses. Landslides, debris flows and culvert and ditch failures often create adverse cumulative effects far downslope/downstream from the actual road. This has the potential to impact threatened and endangered aquatic species present downstream, and threatened and endangered terrestrial species present downslope.



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The actual footprint of construction disturbance for a 24 ft wide road on steep unstable slopes is not discussed, but it will be far greater than the finished road bed width of 24 ft multiplied by a length of up to 17 miles. The document does not disclose the location or length of existing access roads that will be widened or upgraded. The actual road locations need to be identified, and then the impacts can be discussed. They are likely to be far greater than is currently implied.

If the wind farm closes, the roads will still require maintenance. The county is intimately familiar with the conditions, challenges and costs of maintaining roads in this extremely seismically active area that is regularly hit by extreme gusty storm winds and intense rainfall. Who will maintain these roads into perpetuity? Will they be fully removed? Abandonment or partial decommissioning is not acceptable nor environmentally responsible.

187-3

If Humboldt County desires a wind farm, there are many other windy locations which would not have the the magnitude of impacts from road construction and maintenance posed by the Bear River and Monument Ridges area.

In addition to the geology and hydrology impacts, we have concerns about other aspects of the project and the impacts.

Native American cultural resources will be disturbed and the relatively undisturbed landscape and ecosystem context of these resources will be forever lost. Grassy ridges were important travel routes, spiritual areas, and hunting/gathering grounds. It is clear from the DEIS that there is abundant evidence of Native American use of the area. Relatively undisturbed cultural landscapes are increasingly rare, and should not be destroyed. Relocating the project to a different location that has already lost its cultural integrity would be appropriate.

187-4

Threatened and endangered bird species will be killed by the turbines, along with other bird species.

The historic landscape and visual aesthetics of these relatively pristine rolling grassy hills, surrounded by deep[forested valleys will be lost forever. These are classic and cherished Humboldt landscapes valued by residents and visitors, whether it is foggy, raining or gloriously sunny.

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Please stop further consideration of wind (or solar) farm development in this location.

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