

**From:** [CEQAResponses](#)  
**To:** [Ford, John](#); [Werner, Steve](#); [Shortridge, Tricia](#); [Humboldt Wind](#); [Elizabeth Burks](#)  
**Subject:** FW: Comment on Humboldt Wind Energy Project  
**Date:** Tuesday, June 18, 2019 8:09:34 AM  
**Attachments:** image001.png

Thanks,



**Tasheena Evenson**  
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**From:** William Lydgate <Lydgate@sbcglobal.net>  
**Sent:** Monday, June 17, 2019 6:51 PM  
**To:** CEQAResponses <CEQAResponses@co.humboldt.ca.us>  
**Subject:** Comment on Humboldt Wind Energy Project

Dear Project Planner,

Dear Planning Director Ford,

Please accept these comments into the public record for the proposed wind farm by Humboldt Wind, LLC.

The DEIR is inadequate in providing relevant information about the historic geological hazards within the project area. Furthermore, by failing to address these points, the DEIR fails to comply with County policy and standards.

Policy WR-P42: Erosion and Sediment Control Measures.

Stanard S-S1: Geologic Report Requirements. Site specific reports addressing geologic hazards and geologic conditions shall be required as part of the review of discretionary development and ministerial permits. Geologic reports shall be required and prepared consistent with land use regulations (Title III, Land Use and Development, Division 3, Building Regulations, Chapter 6— Geologic Hazards).

Standard S-S2: Landslide Maps.

The DEIR generically mentions the risk of debris slides without disclosing the relevant information that Monument Ridge has a history of catastrophic debris flows within the project area. The most recent debris flow off of Monument Ridge occurred in the winter of 1997 and destroyed several structures before coming to rest above the Highway. Each of the North facing streams draining Monument Ridge have evidence of historic mass wasting; Dean, Monument, Kieler, Dinner, Twin,

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Jordan, Greenlaw and Bear creeks are susceptible to catastrophic debris flows from accelerated runoff in the headwaters.

The DEIR does not include appropriate analysis of the factors that can affect mass wasting such as increasing runoff in the headwaters of streams with a history of catastrophic debris flows from accelerated runoff due to road construction and tree removal.

If activities from this proposal were to trigger debris flows, the consequences have the potential to be significant to both the environment and infrastructure if the slides took out Highway 101 and delivered sediment directly to the Eel River.

Road construction and associated grading for this project are substantial and best management practices may not be sufficient to keep impacts below a threshold of significance. Road width has a large influence on grading, runoff and stability. Project requirements for exceedingly wide roads requires additional scrutiny.

In turn, the DEIR fails to take adequate measures to avoid, minimize, and compensate for these significant impacts. The DEIR must be revised to incorporate additional mitigation measures to reduce impacts below a level of significance.

Thank you for the opportunity to comment on this very important matter.

Sincerely,  
William Lydgate

Sincerely,  
William Lydgate  
437 Shirley Boulevard  
Arcata, CA 95521



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(Cont.0)