

June 14, 2019

Elizabeth Burks  
County of Humboldt  
Planning and Building Department  
3015 "H" Street  
Eureka, CA. 95501

Subject: Humboldt Wind Energy Project  
Draft Environmental Impact Report; SCH 2018072076

Dear Ms. Burks:

I offer the following comments on the Humboldt Wind Energy Project ("Project"). There is a long list of unavoidable significant impacts associated with the project. Almost all of the impacts are a direct result of the project's location.

It's truly disconcerting that a number of studies and technical reports, including Geologic Reports and Grading Plans have been deferred. This is in direct contrast to the landmark CEQA case, *Sundstrom vs. County of Mendocino (1988 202 Cal. App. 3d 296)*. It's also disconcerting that the required Mitigation Monitoring and Reporting Program (MMRP) were not included in the DEIR. Without the MMRP it is difficult, no it's impossible to determine if the proposed mitigation will be effective.

I171-1

Comment Period: Given the volume of information and the significance of the project, the comment period should have been a minimum of sixty (60) and possibly longer as provided by Section 15105 of the CEQA Guidelines.

I171-2

Visual Impacts: Humboldt County is one of the most beautiful natural landscapes in the State, if not in the entire Country. As it's said in real estate, it's all about location, location, location. This is true in this case as well. This project will have a visually significant detrimental impact not only on the communities of Scotia, Rio Dell, Fortuna, Hydesville and Loleta, but on the County as a whole.

I171-3

Humboldt County is visited by almost 3 million tourists a year coming to see our redwoods, beaches, rivers and Victorian communities. Not only do we have the world famous Avenue of the Giants, it's possible we may have the "Highway of the Iron Giants". These iron giants will not only be seen from portions of the Humboldt Redwood State Park, obviously Highway's 101 and 36, but it's likely they'll be seen from Trinidad, Kneeland and South Fork Mountain and Black Lassic in Trinity County.

Visitors wont' be talking about "Murder Mountain", cannabis, the redwoods, beaches, rivers and Victorian communities, they'll be asking "How did you let that happen?"



The DEIR refers in numerous places throughout the document that the WTGs may be up to 600 feet. However, Figure 2.3 indicates the WTGs could be up to 650 feet. Which is it?

The visual impacts of up to sixty, 650 foot tall (Figure 2-3 of the DEIR) towers with the required Federal Aviation Administration's (FAA) flashing strobe lights will only compound the visual impacts.

The DEIR minimizes the visual impacts in the photo renderings and by referring to the areas "atmospheric conditions". These impacts will certainly have an effect on property values in the Eel River valley.

Section 312-17 *et. seq.* of the Humboldt County Zoning Regulations states that in order to approve the project, the Planning Commission must find:

*The proposed development and conditions under which it may be operated or maintained will not be detrimental to the public health, safety, or welfare or **materially injurious to properties or improvements in the vicinity** (emphasis added).*

I personally believe this finding cannot be made. According to a September 2015 article "Do Wind Turbines Lower Property Values?" in Forbes Magazine, it's "...clear that wind power DOES impact property values..." The article refers to a long list of articles, studies and court cases documenting how wind power affects property values.

Biological Resources: The biological impacts are tremendous and likely understated. The potential impacts on Marbled Murrelets, Northern Spotted Owls, Bald and Golden Eagles and other raptors including Falcon's, Hawks, Osprey, Kite's and Turkey Vultures is truly significant. In addition, Condors are to be reintroduced in the Bald Hills area of the Redwood National Park in the near future. The applicant has indicated that within six months of releasing the Condors that they will implement detection technology tied to the Condor's transponders to shut down the windmills when Condors are in the area. This begs the question "What if the Condors establish residency in the area of the project, then what?"

Geology and Soils: I am truly amazed that a Geologic Report and Grading Plan were not included in the DEIR. Nowhere in the DEIR did I see the amount of grading quantified, given the significant amount of grading that is required to improve the access roads to accommodate the various components of the WTGs. The project area is in one of the most seismically active areas in the world. According to the County's GIS mapping program, the area is inundated with historic landslides and is in areas of moderate to high instability. Again, I believe this is in direct contrast with the Sundstrom case.

Hydrology and Water Quality: It's clear based on the geology and soils of the area the project will result in significant erosion and sediment discharges to the river which in turn will impact the fishery and its associated aquatic life. Should the project be approved, grading activities should not occur during the rainy season (October 15<sup>th</sup> through June 1<sup>st</sup>).



1171-3

1171-4

1171-5

1171-6

1171-7

Fire Protection Services and Wildfire Hazards: There will be an increased risk of wildfire associated with the project. The project proposes 32+/- miles of new overhead transmission lines. The area is identified by Cal Fire as a “High” fire severity zone. It’s not “if” a fire occurs as a result of the project, it’s “when”.

1171-8

Transmission lines have been the source of a number of devastating fires, including the deadly Camp Fire near Paradise. According to an article in the November 16, 2018 edition of the Sacramento Bee, Cal Fire investigators believe at least 17 major wildfires in Northern California were caused by problems with power lines in 2017. In the same article according to PG&E there were 1,051 reported fire incidents from 2014 through 2016.

Cumulative Impacts: Another serious flaw is the DEIR did not address to decommissioning of the project, which itself will have significant adverse environmental impacts. This must be considered pursuant to Section 15355 of the CEQA Guidelines as it is a reasonably foreseeable future project.

1171-9

Alternatives: The pending RCEA offshore project should have been evaluated as a possible alternative. According to the Schatz Energy Research Center, the offshore wind resource near Humboldt Bay is among the best in the nation, with wind speeds often exceeding 10 meters per second at 90 meters above the ocean’s surface — and even faster at heights around 120 meters, where the turbines are likely to be centered. Furthermore, offshore wind speeds have a consistent profile between different seasons and throughout the day (with a peak in the early evening), offering the ability to provide stable power throughout the year and help balance the grid as solar power goes offline at dusk.

1171-10

I believe there are a number of technical and legal flaws in the DEIR. As such I recommend the deferred technical studies, the MMRP, the decommissioning of the project and the offshore alternative be included in an amended DEIR and recirculated. Without this being done the only feasible alternative is the “No Project” alternative.

1171-11

Thank you for your consideration of my comments.

Sincerely,

*Kevin Caldwell*

Kevin Caldwell  
Miranda