

B. CHANG RESPONSE TO DRAFT ENVIRONMENTAL REPORT – HUMBOLDT WIND PROJECT

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June 14, 2019



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I strongly oppose the Humboldt Wind, LLC project due the fact that the environmental impact report is incomplete for the size and scope of the project. Multiple faucets of the project are in the discovery phase, as more subject matter experts become aware of this proposed project.

- 1) The seismic activity in the area would require each tower build site to be individually engineered. It is my understanding that a core sample of earth would be taken from each proposed build site and the findings analyzed and the build engineered. The engineering will determine the depth of anchor(s) and quantity of displaced earth. Only at this phase of the process would we have a true idea of the environmental impacts involved.
- 2) For the permit to indicate that decommissioning/dismantling of the site should be addressed in a separate permit is irresponsible. Language could include a new permitting process based on factors not known at this time without negating known environmental impacts on decommissioning/dismantling this project by today's standards. True environmental impacts on the back end of the project are real and must be considered in order for this to be a viable environmental impact report.
- 3) Until the location of the towers are known the FAA is not involved in the night and hopefully foggy lighting of the project. Lighting is known to protect aircraft. The distance an aircraft must be able to see the towers is the distance the Eel River Valley will see the lighting. Red flashing lights will drastically alter the nightscape. The permit does not address radar options that would illuminate the red lights only when aircraft are in the area.
- 4) The board feet of lumber that will be taken to clear the build sites, the existing Jordan Creek Road being enhanced to 25' with 20' shoulders from Highway 101 to the build site, and the 24 mile high voltage lines traveling from Highway 101 to Bridgeville requiring a 100' clearance has not been identified.

I176-1
I176-2
I176-3
I176-4

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5) It appears that the road connection at Depot Road in Fields Landing needs to be modified to accommodate a larger turning radius for WTG component transport. This is in the coastal zone and would require army corp permit, coastal permit and a fish and game permit as this site is a wetland.

1176-5

6) Gentie-Corridor vegetation maintenance has not been addressed thus creating potential fire hazards similar to the Camp Fire, Tubbs Fire, Atlas Fire, and Nuns Fire.

1176-6

7) Clearing vegetation at the Finch Creek Detour is not a maintenance activity. The area of vegetation disruption is outside the guidelines of the Caltrans policy and procedures and would require biological review as part of the CEQA process.

8) The Humboldt County requirements for project grading, excavation, erosion and sedimentation should follow the NPDES guidelines for wet weather construction.

1176-7

9) There appears to be no component for noise levels on Monument Road. Portions of Monument Road transverse through sensitive species habitat.

1176-8

10) The noise component on the roadway only fluctuates by 3 decibels unless the traffic volumes significantly increases (doubling) according to Caltrans 2013. This however is not the case when exhaust brakes are used according to a study in 2012 on Last Chance Grade.

Each public gathering to discuss this project results in more environmental concerns being brought forth. It is noted that the first letter written by Beverly Chang addressed concerns known at that time and those included in this letter are accumulated after the previous close for comment.

This application for permit is one of the largest environmentally impactful projects considered by the County of Humboldt. The size, time and scope of the environmental impact reports for the Eureka/Arcata Safety Corridor, Redwood Park Bypass, the Eureka/Samoa Bridge, and the still delayed Richardson's Grove Project make the work put into this application appear to be very inadequate. It is our hope the County of Humboldt will continue to preserve the rich environmental assets of our community with the due diligence they have shown in the past.

1176-9

I support the no build alternative.

Respectfully,



Beverly Chang