

On Tue, Jun 11, 2019 at 4:31 PM Patty Clary <patty@tanoakhill.com> wrote:
Humboldt County Planning Commissioners
Humboldt County Planning Director John Ford
Humboldt Wind Energy Project Planner
County of Humboldt
Planning and Building Department, Planning Division
3015 H Street, Eureka, CA 95501
Sent via email to CEQAResponses@co.humboldt.ca.us

Dear Director Ford, Project Planner and Commissioners,

For the many CEQA and NEPA environmental impact reports and statements in which our organization, the public interest Californians for Alternatives to Toxics, has participated over the course of 37 years, we have rarely seen the public required to respond to an EIR for a project as complex as the Humboldt Wind Energy Project in just 56 days.

This project actually is two projects in one: the siting and construction of wind turbines on ridges and the construction of new roads/expansion of existing road and new facilities in the Jordan Creek watershed. The issues involved are extremely complex as evidenced by the size of the EIR, which is enormous

Because the public acts as, in many cases, unpaid but interested and invested individuals who donate time to combing through the facts as they are presented in the EIR in ways that very often improve project proposals, often significantly, and because transparent government is important to Californians, especially for complex projects with admitted significant environmental impacts that cannot be mitigated, as in the current EIR, the public deserves sufficient time to study and make comment responses to the EIR.

It is apparent that the size of the project, it's multiple dimensions, the environmental impacts that would require a statement of over-riding considerations and particularly the size of the document--significantly larger than an average EIR for which a 45 to 60 day comment period is usual--constitute the "unusual circumstances" mentioned but not defined in the CEQA guidelines but clearly present in the current project and which warrant a 90 day comment period.

Currently the comment period is for just 56 days. We propose extension to 90 days, a comment period sufficient for this complex project which will not harm the applicant. Please grant an extension of 34 days more to a total of 90 days, to allow the interested public the time needed to participate in the CEQA process for this project.

Sincerely,

Patty Clary, Executive Director
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