

From: [CEQAResponses](#)
To: [Shortridge, Tricia](#); [Ford, John](#); [Werner, Steve](#); [Humboldt Wind](#); [Elizabeth Burks](#)
Subject: FW: Attention Elizabeth Burks, Planner Humboldt Wind Energy Project
Date: Thursday, June 06, 2019 2:34:49 PM
Attachments: image001.png
Wind Project Comments.pdf

Thanks,



Tasheena Evenson
[Planning and Building Department](#)
Code Enforcement
Legal Office Assistant II
Direct: 707.268.3733
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From: Rosie Clayburn <rclayburn@yuroktribe.nsn.us>
Sent: Wednesday, June 5, 2019 10:59 AM
To: CEQAResponses <CEQAResponses@co.humboldt.ca.us>
Cc: Geneva Thompson <gthompson@yuroktribe.nsn.us>; hhoopes@yuroktribe.nsn.us; Chris West <cwest@yuroktribe.nsn.us>
Subject: Attention Elizabeth Burks, Planner Humboldt Wind Energy Project

Good Morning,

Please find the attached letter on behalf of the Yurok Tribe.

Rosie M. Clayburn, M.A.
Tribal Heritage Preservation Officer
Cultural Resources
Yurok Tribe
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YUROK TRIBE

Heritage Preservation Office

PO Box 1027 Klamath, CA 95548

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June 5, 2019

County of Humboldt Planning Department
Attn: Elizabeth Burks, Humboldt Wind Energy Project Planner
3015 H Street
Eureka, CA 95501
CEQAResponses@co.humboldt.ca.us

RE: Yurok Tribe’s Comments on the Humboldt Wind Energy Project Draft Environmental Impact Report.

Dear Elizabeth Burks:

The Yurok Tribe is writing in support of our neighbors, the Wiyot Tribe, and in opposition to the Humboldt Wind Energy Project (“the Project”) as it will have a significant impact on Wiyot cultural resources, cultural landscapes, and impact the endangered California Condor, a natural cultural resource of the Yurok, Wiyot, and many other Native nations and peoples. Further, Humboldt County’s (“the County”) Draft Environmental Impact Report (“DEIR”) fails to provide adequate mitigation measures to avoid the significant impacts to Wiyot cultural resources, cultural landscapes, and the California condor, in violation of the California Environmental Quality Act (“CEQA”).

T1-1

The County has determined the impacts to Wiyot cultural resources and cultural landscapes is significant and unavoidable. (Cultural and Tribal Resources Section of the DEIR, 3.6-38 – 3.6-41). Yurok agrees the Project will have a significant impact on *Tsakiyumi* (Bear River Ridge), but disagrees the harms are unavoidable. The Project will allow for the placement of wind turbine generators along the *Tsakiyumi* ridge and will destroy the Wiyot’s view of the landscape, which is a sacred high prayer spot and serves as a connection to traditional and cultural lifeways. Further, the area is an ethnobotanical cultural landscape where traditionally and culturally significant plants grow. Removing these plants will prevent the Wiyot people from collecting the necessary materials to practice their lifeways. The mitigation measure 3.6-3c to incorporate plants included in the “Wiyot List of Plant Species of Environmental and Cultural Concern” in the final restoration plan is not enough to mitigate the harms to less than significant levels because the Wiyot people will not have access to these culturally significant plants during and after construction of the Project. The destruction of Wiyot sacred and cultural landscapes contributes to the furthering of colonization and genocide of Wiyot people and culture. Threats like this against one Native nation and its people is a threat against all Native nations and Native people. To avoid the significant harms to Wiyot cultural resources and cultural landscapes, the County should adopt the alternative 1 no project or alternative 5 reducing the turbine count to avoid placing wind turbine generators on *Tsakiyumi* (Bear River Ridge). In balance, avoiding the significant harms to Wiyot sacred cultural resources is essential and more important than the minimal economic, legal, social, technological, or other benefits the Project would provide.

T1-2

T1-3

T1-4

The County has also correctly found impacts to the California condor as a cultural resource is significant, but incorrectly concluded these harms are unavoidable. (Cultural and Tribal Resources Section of the DEIR, 3.6-38 – 3.6-41). Further, the County failed to discuss the Project’s impacts to California condor in its Biological Resource section, thus failing to provide mitigation measures to limit the significant impacts to the species. Yurok people consider the condor

T1-5

(pre-go-neesh) a sacred animal. It has been spiritually tied to Yurok ceremonies since the beginning of the world. Its feathers are used and its songs are sung in the World Renewal ceremony, in which Yuroks pray and fast to balance the world. The condor features very prominently in our stories and our dances, particularly the White Deerskin Dance, a 10-day dance of spiritual renewal and thankfulness, which includes a song that the condor itself sang at the urging of the creator. The Yurok used condor feathers on ceremonial items that can be found in items handed down through the generations.

The Yurok Tribe Wildlife Program is working tirelessly for the last decade to develop and implement a program to establish a reintroduced population of California condors to the North Coast region. This proposed project is in the final approval and permitting stages and is a product of many wildlife assessments, development of wildlife restoration facilities, increasing program capacity, and building of stakeholder support for the reintroduction efforts.¹ While the Yurok Tribe's reintroduction of California condor program is still being implemented, the consideration of take on California condors by the Project should not be overlooked, discounted, or minimized. A potential reintroduced population of California condors on the North Coast will contribute to overall recovery of the species and would count towards down-listing and de-listing. For this reason, we feel that more extensive consideration of potential take of future released California condors within the proposed Project area should be considered and adequate mitigation measures adopted to avoid the significant harms to the California condors. In balance, avoiding the significant harms to the endangered and culturally significant California condor is essential and more important than the minimal economic, legal, social, technological, or other benefits the Project would provide.

The Yurok Tribe urges the County to not approve the Project or at the very least amend the DEIR to adopt mitigation measures that would minimize the harms of the Project on Wiyot cultural resources, cultural landscapes, and the California condor to a less than significant level.

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T1-5
(Cont.)

T1-6



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¹ For more information on Yurok Tribe's program, visit our website at http://www.yuroktribe.org/departments/selfgovern/wildlife_program/condor/condorproject.htm