



HCAOG
*Regional Transportation
Planning Agency*

611 I Street, Suite B
Eureka, CA 95501
707.444.8208
Fax: 707.444.8319
www.hcaog.net

Members:

*City of Arcata
City of Blue Lake
City of Eureka
City of Ferndale
City of Fortuna
City of Rio Dell
City of Trinidad
County of Humboldt*

July 15, 2023

Rob Holmlund, Director of Development
Humboldt Bay Harbor, Recreation and Conservation District
P.O. Box 1030
Eureka, CA 95502-1030

RE: Notice of Preparation of the Draft Environmental Impact Report (DEIR) for the Humboldt Bay Offshore Wind Heavy Lift Multipurpose Marine Terminal Project

Dear Mr. Holmlund,

Thank you for the opportunity to comment on the Notice of Preparation of the Draft Environmental Impact Report for the Humboldt Bay Offshore Wind Heavy Lift Multipurpose Marine Terminal Project.

The Humboldt County Association of Governments (HCAOG) is the Regional Transportation Planning Agency (RTPA) comprised of the seven cities and County of Humboldt. As the RTPA, HCAOG maintains and updates the Regional Transportation Plan (RTP) to guide transportation investments in the region over the 20-year planning period. HCAOG has also been an active partner in the Redwood Region Climate and Community Resilience Hub (CORE Hub) and the broader North Coast Offshore Wind Community Benefits Network (Network).

HCAOG has a particular interest in the Humboldt Bay Offshore Wind Heavy Lift Multipurpose Marine Terminal Project because, as noted in the California Coastal Commission's staff report for the Bureau of Ocean Energy Management Coastal Consistency Determination for lease of federal waters for the future development of offshore wind energy facilities, there are many aspects of the project that could impact the region's transportation system, and cause increased air pollution and greenhouse gas emissions, with disproportionate effects on lower-income and Native communities. Specifically, the staff report notes that:

"Ports have significant economic importance both locally and statewide. However, industrial activity and development at ports can result in significant environmental burdens for communities of concern living near ports, including air, water, noise, and light pollution (EPA, 2021). This not only affects residents, but also workers and visitors who might recreate near port areas. Near the Redwood Marine Terminal area, there are several low-income communities and populations with additional sensitivities such as asthma and cardiovascular disease (See Exhibits 8-1, 8-4 and Table 4-1) that may be exacerbated with additional pollution impacts in the area that may occur from Humboldt Harbor District expansion and future operations to support offshore wind energy generation.

Additional air pollution may occur from vehicle emissions on land and vessel emissions offshore. Road capacity in the Samoa area is limited and future harbor

development has the potential to result in higher numbers of trucks delivering manufacturing, fabrication, and assembly supplies to the Redwood Marine Terminal, affecting air quality for nearby communities of concern as well as communities further inland along transportation routes”¹.

The region’s long-range regional transportation plan *Varieties in Rural Options of Mobility 2022-2042 (VROOM)* charts a course for developing a balanced and sustainable transportation system. When analyzing whether the project conflicts with any adopted transportation plans, please review *VROOM* to determine if the Project is consistent with the adopted regional policies and targets. Policies within *VROOM* may influence your evaluation of DEIR environmental topic areas including but not limited to, Air Quality, Greenhouse Gas Emissions, and Transportation. Adopted Safe and Sustainable Transportation Targets² call for reducing Vehicle-Miles Traveled and transitioning public fleets to Zero Emission. Chapter 11 “Goods Movement” includes an evaluation of Harbor/Marine facilities in Humboldt Bay and associated maritime shipping resources. In addition to the Safe and Sustainable Transportation Targets, specific policies to be aware of include but are not limited to:

Policy GM-1. (Intermodal) HCAOG shall promote multiple uses of transportation corridors and strategic use of intermodal transfer facilities.

Policy GM-2. (Intermodal) HCAOG shall encourage and support safe, multimodal accessibility at Humboldt’s public use airports and seaports.

Policy GM-4. (Maritime) HCAOG will support the Humboldt Bay Harbor, Recreation and Conservation District’s efforts to develop a fully operational, sustainable, and environmentally compatible maritime transportation system as consistent with the Harbor District’s mission.

Policy GM-8. Energy-Wise Freight & Transport: HCAOG shall promote projects and programs that increase energy efficiency, conserve energy, and use alternative (“clean”) energy sources to transition to a carbon-neutral transportation system and reduce the direct and indirect costs of freight and passenger transportation.

Policy GM-9. (Goods Movement) HCAOG shall work with NCUAQMD and other stakeholders to develop and promote programs, technologies, and best practices to reduce the transportation sector’s air pollutant emissions (e.g., NO_x, PM, SO_x, sulfate, VOC) and to decarbonize California’s freight transport system. { *California Sustainable Freight Action Plan 2016* }

Policy GM-10. (Zero Emission Vehicles): HCAOG will work with the freight industry to encourage and help accelerate the widespread transition to zero-emission technologies and infrastructure (CAPTI 2021).

Policy GM-12. (Maritime) HCAOG will assist local, regional, or state lead agencies in preserving coastal-dependent land uses as necessary for successfully operating the regional maritime transport system to meet demands for its highest and best use.

Policy GM-13. (Goods Movement) HCAOG shall collaborate with State, local, and Tribal agencies to help reduce and eliminate health, safety, and quality-of-life impacts on communities that are disproportionately affected by operations at major freight corridors and facilities. This includes reducing toxic hot spots from freight sources and facilities and ensuring continued net reductions in regional freight pollution. { *California Sustainable Freight Action Plan 2016* }

POLICY STREETS-7. Global Warming Solutions: HCAOG shall carry out policies and program funding for projects that will help achieve the goals of the Global Warming Solutions Act (California Assembly

¹ [California Coastal Commission Staff Report](#), 1/24/2022, page 17-19.

² *Vroom 2022-2042, Safe and Sustainable Transportation Targets*, found in the [Renewing Our Communities chapter, pages 2-13 to 2-18](#).

Bill 32 (2006) and Senate Bill 32 (2016)). This shall include supporting efforts to reduce non-renewable consumption and air pollution, such as projects that increase access to alternative transportation and renewable fuels, reduce congestion, reduce single-occupancy (motorized) vehicle trips, and shorten vehicle trip length, and reduce greenhouse gas emissions.

POLICY STREETS-11. Vision Zero: HCAOG adopts the Vision Zero commitment to support policy, strategies, and roadway design standards that have been shown to be most effective in improving safety, with the goal of eliminating all traffic fatalities and severe injuries in Humboldt, while increasing safe, healthy, equitable mobility for all users.

With regard to multimodal transportation, HCAOG encourages the Harbor District to analyze and mitigate for potential impacts of the project's vehicular traffic on the walkability and bikeability of Highway 255, New Navy Base Road, and the surrounding street network. We hope to see a robust commute trip reduction plan to encourage non-single occupancy trips to the site. We recommend working with the Humboldt Transit Authority to ensure transit service is available.

In May 2023, HCAOG adopted Resolution 23-18 concerning offshore wind development and participation in the North Coast Offshore Wind Community Benefits Network. HCAOG believes it is essential that the offshore wind industry develops and operates equitably and sustainably, and in partnership with the region's communities, to address the area's unique assets, needs, and connections with natural resources.

North Coast Wind Community Benefits Network Goals include:

1. Investment in partnerships to enhance community infrastructure and services,
2. Environmental protections and compliance,
3. Equitable workforce and economic development,
4. Community centered decision-making, outreach, and engagement, and
5. Local and tribal fisheries protections.

HCAOG applauds Humboldt Bay Harbor, Recreation and Conservation District's Resolution No. 2023-05,³ that commits to sustainable and equitable development of the offshore wind industry, and to collaborate with the CORE Hub's Offshore Wind Community Benefits network and others in pursuing community benefits agreements. We encourage the Harbor District to share their progress in acting on this resolution and we are willing and able to partner on supporting these efforts by offering technical assistance or capacity where possible.

We note that the NOP does not mention a lease with Crowley Wind Services. However, signing a lease agreement is a project under CEQA and should be included in the NOP. Signing a lease agreement in advance of the Harbor District completing the environmental review process would not only be out of sequence for CEQA compliance, but it will disadvantage the community's ability to meaningfully participate in the process, and potentially open the project up to vulnerability and delays.

Specific to the NOP, the following suggestions are offered, based on HCAOG's goals and policies, including to support efforts around the community benefits agreement, and our understanding of the goals of local communities:

1. Revise Project Objective H. Objective H currently states: *To the degree feasible, develop a marine terminal site with modern environmental standards, related to the minimization of greenhouse gas emission, onsite renewable energy generation, green building materials, the electrification of terminal operations, and the facilities needed to accommodate vessel shore*

³ Humboldt Bay Harbor, Recreation, and Conservation District Resolution No. 2023-05: A Resolution of the Board of Commissioners Concerning Offshore Wind Development off the west Coast of the United States and Around Humboldt Bay

power. Revising the objective to commit to the development of a zero-emissions port more succinctly would offer a greater sense of certainty that a zero-emission port would be aggressively pursued, eliminating potential air quality and greenhouse gas emission impacts which will inequitably burden populations around Humboldt Bay and beyond. Expressly including a zero-emission port in the project objectives would also further NOP Objective C which is to: *Develop a project that establishes Humboldt Bay as a global leader in addressing climate change and energy decarbonization by serving a critical role in offshore wind renewable energy development.*

2. If a zero- emissions port is not added to the project objectives, include it as a project alternative to be analyzed.
3. Through avoidance or mitigation measures offset foreseeable impacts with specific operational commitments as part of the Wind Terminal design and buildout, including commitments to traffic safety, electric vehicle charging stations, a dig-once policy, public fishing piers, surf and beach access, a comprehensive trail system, coastal dune restoration, climate resilience projects, dedicated greenspace, and spaces for community services.

Equitable offshore wind development in our region presents a unique opportunity to meet state and federal climate goals, as well as those promoted by HCAOG which include a carbon-neutral, multimodal transportation system that is safe, sustainable, and equitable. We appreciate the Harbor District's leadership in this regionally significant project and the opportunity to comment on the NOP.

If HCAOG can be of assistance in pursuing federal or state funding to achieve a zero-emission port, or advance multimodal goals please reach out to staff.

Sincerely,

Mike Johnson
HCAOG Board Chair