

From: Jane Hartford <jehartford9@gmail.com>
Sent: Friday, May 31, 2019 9:00 AM
To: Johnson, Cliff <CJohnson@co.humboldt.ca.us>; Ford, John <JFord@co.humboldt.ca.us>; Planning Clerk <planningclerk@co.humboldt.ca.us>; CEQAResponses <CEQAResponses@co.humboldt.ca.us>
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Subject: Re: Comments on Draft EIR for Humboldt Wind Project (proposed by Humboldt Redwood Co. and Terra Gen)

Dear Cliff and all,

Please read this article from EPIC re the HRC/Terra Gen Wind Project.

<https://www.wildcalifornia.org/blog/proposed-wind-project-presents-alarming-impacts?eType=EmailBlastContent&eld=400c5134-0a3b-483b-8919-8f77009cd517>

Here are some key points:

"Yet still, renewable energy is not without its environmental costs, and here the proposed project has *many worrying* impacts. The project is proposed in a precarious location—along Monument and Bear River Ridges between the Eel River and the ocean, and overlapping in part with the Cape Mendocino Grasslands Important Bird Area.

Due to its location, the California Department of Fish and Wildlife warned in an early letter to the county that the location was one with “High or Uncertain Impacts to Wildlife” or was “Inappropriate for Wind Development.” Poorly conceived or developed project have tarnished the reputation of wind power in the past.

From the Draft Environmental Impact Report:

- Operational impacts to nonraptor birds are “potentially significant,” particularly to a population of horned larks which are reproductively isolated from other populations and may represent a unique and distinct evolutionary lineage.
- Impacts to raptors are “significant and unavoidable,” with potentially over 100 raptor deaths *per year*.

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- Hundreds of bats are likely to be killed per year, with reason to suspect that this project—owing to its close proximity to a known bat migratory “hot spot”—could cause species-level impacts to the hoary bat.
- An estimated 20.86 marbled murrelets, a species protected by the Endangered Species Act, will be killed through the 30 year life of the project.
- Bald and golden eagles will likely be killed by the operation of the project, although there is no estimate yet on the total number.



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(Cont.)

And so on. Renewable energy should be an answer to the Anthropocene, not a further cause of it. We need to do the right things in the right way. “

Thanks for considering this project very carefully.

Jane Hartford
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Proposed Wind Project Presents Alarming Impacts

By [Tom Wheeler](#)

Thursday, May 30th, 2019

EPIC Urges Greater Efforts to Minimize Impacts to the Environment



Simulation showing what the view from Scotia would look like after large turbines are installed atop Monument Ridge. Photo courtesy of Terra-Gen.

There is a wind energy project proposed for the hills just outside of Scotia, California. Renewable energy is necessary to limit the harm of global climate change. And many species will be harmed from climate change, hastening the pace of the Anthropocene.

Yet still, renewable energy is not without its environmental costs, and here the proposed project has *many* worrying impacts. The project is proposed in a precarious location—along Monument and Bear River Ridges between the Eel River and the ocean, and overlapping in part with the Cape Mendocino Grasslands Important Bird Area. Due to its location, the California Department of Fish and Wildlife warned in an early letter to the county that the location was one with “High or Uncertain Impacts to Wildlife” or was “Inappropriate for Wind Development.” Poorly conceived or developed project have tarnished the reputation of wind power in the past.

From the Draft Environmental Impact Report:

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- Hundreds of bats are likely to be killed per year, with reason to suspect that this project—owing to its close proximity to a known bat migratory “hot spot”—could cause species-level impacts to the hoary bat.
- An estimated 20.86 marbled murrelets, a species protected by the Endangered Species Act, will be killed through the 30 year life of the project.
- Bald and golden eagles will likely be killed by the operation of the project, although there is no estimate yet on the total number.

And so on. Renewable energy should be an answer to the Anthropocene, not a further cause of it. We need to do the right things in the right way.

But there are ways to reduce the operational impacts of wind energy on wildlife. Many of these, however, have been left out of the project—at least for now. Take impacts to bat species. Considerable research has been conducted to look at how to minimize harm to our mammalian friends. Limiting operation during high risk periods—such as limiting operation during low-wind periods during migration—has been shown to be effective, reducing fatalities by 44-93% with only minimal impacts to power generation. Other techniques, from the sensible (ultrasonic acoustic bat deterrent devices) to the seemingly silly (painting the turbine blades purple), offer the potential to reduce project impacts further. The project, however, does not adopt any mitigation measures. Instead, the project proposes to convene a “technical advisory committee” to recommend mitigation measures *after* the project has already begun operations.

The Draft Environmental Impact Report is where EPIC and the public can influence the design and development of the project. To the extent that we can devise additional mitigation measures, the county and the developer have an obligation to consider these mitigation measures. EPIC’s time and efforts is being concentrated here.

Until all feasible mitigation measures have been exhausted, there is still work that must be done. EPIC expects that further refinement of the project will occur to minimize harm and we will continue to monitor and engage in the project’s development to emphasize the need to avoid, minimize and mitigate impacts. We should not have to make a choice between renewable energy and bird and bat deaths.

If you would like to read more, EPIC encourages you to read the Draft Environmental Impact Report, available [here](#). Comments are due on June 5 and can be emailed to CEQAResponses@co.humboldt.ca.us.

Tags: [hoary bat](#), [marbled murrelet](#), [renewable energy](#), [terra gen](#), [wind turbine](#)

This entry was posted on Thursday, May 30th, 2019 at 1:10 pm and is filed under [Blog](#).

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