

June 7, 2019

Humboldt County Planning Department

Re: Humboldt Wind Energy Project Draft Environmental Impact Report

I appreciate the opportunity to comment on the DEIR. Specific concerns that I have are related to impacts to the biological environment.

I support developing wind and other forms of renewable energy and I believe they are essential to our future. This project presents impacts that are not adequately mitigated or are likely incapable of mitigation without significant revisions of the project. These revisions may include siting of wind turbines (WTGs) in areas that may be less harmful to a variety of bird and bat species, curtailment of operation during periods when birds and bats will be at greater risk of colliding with WTGs, and possibly reducing the overall size and footprint of the project to avoid high impact areas.

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Specific comments follow:

Regarding marbled murrelets, the DEIR states that no operating wind facilities exist in marbled murrelet habitat. It cites a collision risk assessment done by H.T. Harvey and Associates which forms the basis for the estimated project-lifetime mortality estimate range for this species. This assessment is overly relied upon; without real world experience, there is no realistic way to predict the actual range of possible mortality to murrelets, which may be highly sensitive to additional sources of mortality.

While reporting that no wind energy projects operate in murrelet habitat, the DEIR cites the Skookumchuk wind energy project under development in Washington — also murrelet habitat. The increase in wind energy projects in marbled murrelet habitat introduces multiple new sources of mortality at a rate that cannot be accurately predicted and may place the species at an unknown level of risk for extinction.

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Proposed mitigation measures for marbled murrelets involve field identifications and accurate counts of murrelets killed by the WTGs (the PCMM process). If it led to accurate mortality counts, PCMM could have value in field checking the Harvey assessment, but it is unrealistic to expect an accurate count of murrelet deaths caused by the WTGs. These are small birds, their bodies may be badly damaged by WTG collisions which may occur at significant altitude and at a velocity that would send carcasses far into the nearby forest canopy, becoming inaccessible for counts and inaccurately reducing the estimated mortality. Second, the “intensive” count period would be three years, reduced thereafter to less accurate “road and pad” counts. Random year to year variations in mortality or changes in the accuracy rate of locating dead birds may make this short time period inadequate for an “intensive” PCMM, thus skewing the mortality estimates upon which subsequent decisions on any additional mitigation measures would be based.



Corvid management in Van Duzen County Park is identified as a mitigation for murrelet impacts. This is based on another assessment by H.T. Harvey and Associates. I could not find this report in the appendix, if it is there, so I could not evaluate it.

Regarding the predicted number of actual deaths based on murrelet PCMM, the DEIR states that “estimates can be used as triggers for potential adaptive management or to evaluate effectiveness of mitigation.” Even assuming that accurate mortality estimates can be made, there are problems with this approach. No specific numbers are cited that would trigger additional mitigation, nor are specific “adaptive management” strategies described in a way that would make clear when to proceed with which specific measure.

Adaptive management of WTGs would result in reduced energy production and economic viability of the project. Staff, consultants, or project managers would be under pressure to avoid reducing WTG productivity. Without clarity of process identified in advance it is likely that these mitigations would be avoided.

The approach of mitigation proceeding dependant on estimates based on the results of a body count, at “intensive” level for the first three years, and only then, if numbers of dead animals appear overly high, proceeding with actual mitigation for the harm done, is one that is repeatedly proposed to address impacts to other animals as well.

For example, regarding the northern spotted owl, the DEIR states that:

“After collection of 3 years of postconstruction monitoring data, the Humboldt County Planning & Building Department will review the data and, in consultation with USFWS and CDFW, will determine which, if any, specific WTGs generate disproportionately high levels of avian mortalities ,,. If specific WTGs are found to result in disproportionately high avian mortalities, the project applicant shall consult with the County to evaluate any feasible measures that can be implemented at the discretion of the County to reduce or avoid mortalities at those specific WTGs.”

This punts the decision on actual mitigation to a future date, after three years of project operation and dependant on PCMM that may not accurately reflect true mortality. Mitigation decisions may impact the project’s economic viability. There is no escaping the risk that this will color the perceptions of wildlife and planning managers and staff.

The DEIR’s assessment of risk for raptors in general is truly staggering: “the fatalities of as many as 114 raptors/year on regional populations of raptors would substantially reduce the region’s raptor populations.”

This impact is described as “significant and unavoidable.” Yet proposed mitigation measures focus on funding retrofits of power poles to reduce electrocution of raptors in other areas,. This would do nothing to prevent a possible extinction of raptors in the gernal area of the project. A basic ecological principle holds that removal of significant

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carnivores can have cascading impacts on other elements of an ecosystem. There is no mention of this possible effect in the DEIR.

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Impacts to the highly unusual breeding population of horned larks are not adequately addressed. The DEIR states that “Horned larks often compose a large proportion of mortalities at wind farms in the region, but the species’ abundance at the project site is relatively low. Nonetheless, impacts on this species here may have a disproportionately large impact.” This suggests the risk for local extinction of this species.

The animal’s protective status is unclear and genetic testing may determine that. But even if not genetically distinct, that this population nests 100 miles from any other horned larks suggests that it is worthy of measures to protect it.

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Risks presented to horned larks, apparently nesting exclusively in a small area of Bear River Ridge, and to other birds and bats, suggest that siting of WTGs will have an outsize effect on impacts. The National Audubon Society’s informational paper “Position on Wind Power” supports wind energy but emphasizes that “harmful effects to birds and other wildlife can be avoided or significantly reduced in the following ways: Proper siting and operation of wind farms and equipment,” among others.

The siting and operation of the project is of concern regarding the hoary bat, identified as heavily utilizing Humboldt Redwoods State Park. This bat is described as highly sensitive to wind energy projects and possibly facing a 90% population loss even without additional wind projects.

Rather than specifying “operational minimization measures” to reduce WTG use during high risk periods (identified as periods of low wind speeds, fall migration periods, pre- and post- storms), the DEIR relies again on PCMM and the recommendations of a Technical Advisory Committee to analyse mortality counts, however inaccurate they may be, to make the tough decisions that will likely be needed to prevent possible extinction of this species. These and the other measures identified should not be relied upon to make a “less than significant” determination, as the DEIR does.

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I am a proponent of wind energy but I believe it must be done in a way that protects other resources, and obviously following environmental review that is in accordance with CEQA. I hope that these comments may be of help in developing this project in the right way.

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