

From: [CEQAResponses](#)
To: [Werner, Steve](#); [Ford, John](#); [Shortridge, Tricia](#); [Humboldt Wind](#); [Elizabeth Burks](#)
Subject: FW:
Date: Friday, June 14, 2019 2:37:31 PM
Attachments: image001.png

Thanks,



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From: Lynne Abels <lynneabels@gmail.com>
Sent: Thursday, June 13, 2019 8:11 AM
To: CEQAResponses <CEQAResponses@co.humboldt.ca.us>
Subject:

Humboldt County Planning Department
Humboldt Wind Energy Project Draft Environmental Impact Report
June 13, 2019

In general I support wind energy but I feel the DEIR does not adequately address impacts to birds and wildlife. There is not much mitigation rather there is a planning to plan mitigation. The proposal to operate at "intensive" levels for three years before evaluating potential mitigation creates conflict of interests in project managers and staff who will be responsible for determining actions which may impact the economic success of the project.

The Audubon Society which supports wind energy projects stresses that three most effective mitigation measures include "operational minimization measures" to reduce WTG use during high impact periods, siting of wind turbines in areas less harmful to birds and in this case (Hoary Bats), and/or reducing the size and footprint of the project in areas of greatest impact. These measures need to be the guidelines used in the DEIR. Additionally the American Bird Conservancy Bird Smart Wind Energy Policy suggest that offset measures (which are relied upon in the DEIR) are ineffective and unreliable.

To summarize my suggestions are 1. specify what mitigation measures are to used in the DEIR with an emphasis on siting and reducing size and footprint when necessary 2. Avoid conflict of interests by having the implementation of any operational minimization measures specified at outset and

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overseen by persons who will not be vulnerable to economic pressures. 3. avoid the use of offset mitigation

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(Cont.)

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