

Humboldt Wind Energy Project Planner
County of Humboldt Planning Department
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I am commenting on the Draft Environmental Impact Report for the proposed Humboldt Wind Energy Project, as both a concerned resident of Humboldt County and as a wildlife biologist. One topic of concern I have heard discussed is the mitigation measures for environmental impacts and that some of them are either inappropriate or not planned well. Thus I expect some comments address the lack of appropriate mitigations. I will address one of the mitigation measures proposed for northern spotted owls. I have worked on a northern spotted owl study for the past 25 years and am familiar with their population dynamics, habitat, and the research being conducted on the impact of barred owls. The DEIR states that the project may include barred owl management as mitigation for loss of spotted owl habitat. It is much too premature to count on barred owl management as a mitigation measure. The USFWS has not yet determined if barred owl management will be a viable tool to benefit spotted owl populations; also USFWS has identified management of both habitat and barred owls for conservation of the spotted owl so using barred owl management will have to be addressed case by case and may not be an appropriate mitigation measure for the wind power project. Barred owl management should not be included as part of the project until USFWS concurs that it is appropriate.

1172-1

I am also concerned about the potential impacts to the coastal prairie habitat. Native coastal grasslands have certainly declined in both area and quality over the years with both development and encroachment of trees due to fire suppression. It is unknown how much native coastal grassland is left in northern California (Adam Canter, Wiyot tribe botanist, pers. comm.) and I think it prudent to protect what coastal prairie we have in Humboldt County until we know more about this native resource. The Wiyot have used this cultural resource for a long time and I think it is inappropriate to significantly impact this resource with a large project of this nature.

The project DEIR states that if condors are released as planned, the WTG system will not be a risk because of the transponders attached to the released condors. However, as condors begin to breed there will be condors without transponders which will be at risk from the turbines. The DEIR also states that the impact on condors would be significant and unavoidable.

1172-2

As a resident of Humboldt County for over 2 decades, I support the native tribes' history and cultural practices. I ask that project planners consider the unavoidable impacts on the ethnobotanical and cultural wildlife resources that the Wiyot have identified. In recent years there has been a lot of support from Humboldt County residents for the cultural history of the Wiyot and I believe we should respect their comments and recommendations on the Humboldt Wind Power Project.

Sincerely,
Peter Carlson, Arcata