



National Headquarters

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June 14, 2019

Submitted via email to CEQAResponses@co.humboldt.ca.us

Humboldt Wind Project Planner
County of Humboldt
Planning & Building Department, Planning Division
3015 H Street, Eureka, CA 95501

Defenders of Wildlife
National Headquarters
1130 17th St NW
Washington, D.C. 20036

Re: Draft Environmental Impact Report for Humboldt Wind LLC, Humboldt Wind Energy Project

Dear Mr. Ford,

On behalf of Defenders of Wildlife (Defenders) and our more than 1.8 million members and supporters, we thank you for the opportunity to provide comments on the Draft Environmental Impact Report (DEIR) for the Humboldt Wind Energy Project. Defenders has a long history of working to advance clean, emissions-free renewable energy, while simultaneously working to ensure that these projects minimize impacts to wildlife and habitat. Defenders has become a leader on issues of bats and wind energy, working with researchers, state and federal agency staff, industry, and conservation organizations to elevate the importance of bats and wind energy coexistence. Finding solutions so that wind energy can be built out at the pace and scale needed to prevent catastrophic climate change while preventing population-level impacts to migratory bats is the top priority of Defenders' Renewable Energy team. We look forward to further discussions and collaboration with federal and local agencies, industry, and bat biologists to identify appropriate avoidance and minimization measures to ensure that Humboldt Wind Energy Project can be constructed and operated in a way that is consistent with supporting healthy populations of migratory bats.

011-1

We agree with the DEIR's assessment and analysis of operational impacts on bats and its emphasis on growing concerns for hoary bat populations across their range (IMPACT 3.5-18). While the best available science reveals the potential for significant and concerning impacts to hoary bats from wind energy generation, we do not yet understand the specific siting conditions that lead to risk for hoary bats and other migratory bat species. However, because of the proximity of this site to important and possibly unique hoary bat swarming grounds, there is reason for caution. Accordingly, robust monitoring, adaptive management, and mitigation are critical to ensure that this project does not cause irreparable harm to the most important known swarming area for hoary bats and to the research being done there to better understand the species.

011-2

We appreciate Terra-Gen's corporate stewardship to better understand these concerns and collaborate with researchers to find solutions through the establishment of the Technical Advisory Committee (TAC). Terra-Gen has a strong record of operating wind energy facilities responsibly for wildlife. We look forward to working with Terra-Gen and the TAC to ensure a defined and robust monitoring, mitigation, and adaptive management plan is in place prior to operation to ensure the project does not result in higher than average hoary bat fatalities for the region.

Defenders of Wildlife is firmly committed to supporting wildlife-responsible wind energy and we welcome the opportunity to support Humboldt County, the TAC, and Terra-Gen in this endeavor. While hoary bat conservation will require an industry-wide response, we appreciate the efforts by Terra-Gen and Humboldt county to do their part to conserve the species. Please do not hesitate to reach out to us with any further questions.

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(Cont.)

Sincerely,
Pasha Feinberg
Renewable Energy and Wildlife Analyst
Defenders of Wildlife
pfeinberg@defenders.org