

From: [CEQAResponses](#)
To: [Werner, Steve](#); [Ford, John](#); [Shortridge, Tricia](#); [Humboldt Wind](#); [Elizabeth Burks](#)
Subject: FW: Comments on Humboldt Wind Energy Project
Date: Friday, June 14, 2019 2:52:35 PM
Attachments: image001.png

Thanks,



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Code Enforcement
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From: Bay Area Coalition for Headwaters <bach@headwaterspreserve.org>
Sent: Friday, June 14, 2019 1:22 PM
To: CEQAResponses <CEQAResponses@co.humboldt.ca.us>
Subject: Comments on Humboldt Wind Energy Project

Project Planner
Humboldt Wind Energy
County of Humboldt Planning Dept.

June 14, 2019

Dear Planning Director Ford,

I submit these comments on behalf of my organization, the Bay Area Coalition for Headwaters, and myself as Director of that organization. The Bay Area Coalition for Headwaters (BACH) is a Bay Area based non-profit that works with organizations on California's north coast who have similar interests and goals as BACH—that is, preservation of intact forest ecosystems, habitat protection and restoration and species protection, along with related environmental issues.

We submit comments because BACH has concerns about the proposed wind project from Humboldt Wind, LLC. While climate change is a serious threat to Humboldt County, along with it being a global crisis, and our belief that alternative and sustainable and renewable energy are a large part of the solution, this particular project, we believe, is poorly sited and has far too many potential impacts on sensitive wildlife. Although in some circumstances, wind energy can be a very appropriate alternative to fossil fuels, in some circumstances, developed wind projects can cause drastic environmental impacts. We do not believe project planners have sufficiently addressed these potential impacts.

012-1

The sensitive and threatened species the marbled murrelet, already severely impacted by years of reckless and rapacious logging practices in Northern California are known to fly over the proposed area. In fact, the location, along Monument and Bear River Ridges between the Eel River and the ocean overlaps within the Cape Mendocino Grasslands Important Bird Area. We have great concern for impacts on raptors as well as murrelets. In fact, the DEIR makes clear that the project is “likely” to result in death of numerous special status species. Why would project planners find “likely” fatal impacts acceptable?

012-2

As well, the project, as outlined in the DEIR, may cause population-level impacts to once-numerous species, such as the hoary bat. The migratory hoary bat has been found to be the #1 species killed in wind projects. Impacts on the hoary bat are not sufficiently mitigated.

The California Dept. of Fish and Wildlife warned in an early letter to the County that the location had “high or uncertain impacts to wildlife.” How is this answered by project planners?

012-3

the California Department of Fish and Wildlife warned in an early letter to the county that the proposed location was one with “High or Uncertain Impacts to Wildlife.” There are ways to reduce the operational impacts of wind energy on wildlife. Many of these, however, have been left out of the project. Please explain why they were left out.

The DEIR must be revised to incorporate additional mitigation measures to reduce impacts below a level of significance.

These include, among other things:

- proper siting of wind turbines to avoid impacts,
- operational curtailments during high-risk periods, and
- incorporation of deterrence technologies.

012-4

These project changes are reasonable, having been adopted at other wind projects elsewhere in California and the United States, and would reduce impacts to wildlife. Furthermore, the County needs to insist on a robust and meaningful adaptive management program to continue to monitor and minimize impacts throughout the life of the project.

As outlined at present, impacts to wildlife pose too high a risk for the project to proceed at this time, at this location, on this scale.

Thank you for receiving our comments.

Sincerely,

Karen Pickett

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