



# REDWOOD REGION AUDUBON SOCIETY

P.O. BOX 1054, EUREKA, CALIFORNIA 95502

June 14, 2019

Humboldt Wind Project Planner  
Humboldt County Planning and Building Department  
3015 H Street  
Eureka, CA 95501  
Via email to CEQAResponses@co.humboldt.ca.us

Subject: Comments on Draft Environmental Impact Report (DEIR) for the Humboldt Wind Energy Project, SCH No. 201872076

Dear Humboldt Wind Project Planner:

Redwood Region Audubon Society (RRAS) is a C29 503 non-profit environmental organization primarily focused on birds. We have reviewed the DEIR and find it to be inadequate in its documentation of existing conditions, impact analysis and mitigation measures related to local avian populations. Thus, we believe that a revised DEIR for this project may need to be recirculated for public review before it is certified (as per the California Environmental Quality Act Guidelines, Section 15088.5. Recirculation of an EIR Prior to Certification).

O16-1

### Comments

- Most important, bird survey data has not been collected over a long enough period to draw valid conclusions on impacts, prepare mitigations, or to meet regulatory guidelines. **We believe that two complete breeding seasons is the minimum time period for collection of data from which valid conclusions can be reached regarding the project’s potential impact on bird populations.** None of the project bird surveys appear to be conducted for two years, and some were carried out for less than one year.

- Marbled Murrelets: The DEIR states that “No operational wind energy facilities exist within the range of marbled murrelet, so no information is available regarding the birds’ ability to avoid colliding with moving WTGs (wind turbine generators).” (p. 3.5-76.) It also states that “a collision avoidance rate of 0.98 was applied in the collision model, consistent with current information about empirically derived collision avoidance rates for most other birds, particularly among seabirds.” (No references provided). It finally states, “However, given the lack of prior information about marbled murrelets, avoidance rates may be lower than anticipated.” (p. 3.5-77.) This is a critical issue because the model used to determine total mortality over a 30 year period is very sensitive to small changes in the collision avoidance rate. The consultant’s analysis found that “reducing the collision avoidance rate by 0.01 increased the predicted collision rate by 46.56 percent.” (p. 3.5-77.) Since the chosen collision avoidance rate of .98 is completely unsubstantiated for Marbled Murrelets, (and the passage rate is based on only one year of recent site specific data), we strongly recommend that the consultant choose a more conservative collision avoidance rate to predict Marbled Murrelet losses and design commensurate mitigation measures.

O16-2

- Northern Spotted Owl: Two years of U.S. Fish and Wildlife Service Protocol level surveys should be conducted for this species.

O16-3

- Golden and Bald Eagles: Two years of surveys should be conducted using U.S. Fish and Wildlife Service protocol level standards for wind projects. These birds are fully protected and many studies have documented Golden Eagle losses to wind turbines.

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O16-3  
(Cont.)

- Horned Lark: This species breeds on Bear River and Monument Ridge. Since these birds are philopatric (tend to remain near a particular site or area), they have adapted specifically to this area and could be considered a unique subspecies. Recruitment of this species from other areas is also less likely. In order to be assured that this Horned Lark population continues to thrive, its current breeding success and mortality due to the project construction and operation must be accurately determined.

O16-4

- California Condor: The DEIR states “If condors are released in the Bald Hills in Redwood National Park...with a range overlapping the project’s WTGs, the project applicant shall implement a detection system using the transponders attached to the condors, and shall curtail operations when condors are close to the WTGs so that the condors are not at risk of encountering operating WTGs.” (p. 3.6-42.) The condor detection plan is to be implemented within six months of the release of the birds. Even though this is a “nonessential experimental” release, meaning it is not subject to state or federal endangered species acts, a delay of as much as six months before the birds can be detected and turbines shut down is of great concern. The loss of even one California Condor should be considered very significant. Regular condor surveys should begin immediately onsite once the birds are released and efforts to more swiftly implement the detection system should be a high priority.

O16-5

- Mitigation Measures: We recommend that the mitigation measures include the curtailment of construction activities and project operation during high risk periods for the Marbled Murrelet and other bird species of concern (Northern Spotted Owls, eagles, migratory songbirds, etc.). For example, the only post-construction mitigations for eagle mortality are to survey the turbine sites for carcasses and retrofit utility poles to avoid electrocution.

Also, many mitigation measures are to be formally developed by a future committee, including those related to the temporary and permanent habitat losses of 894.79 acres. We believe that all of the proposed mitigation measures should be included in a revised DEIR for public review.

O16-6

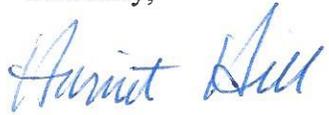
A potential mitigation measure for Marbled Murrelets would be the use of radar to shut down the turbines when the specific signature of a murrelet is detected on the radar screen. Humboldt Redwood Company has been using this type of detection for murrelets for many years. Marbled Murrelets also have distinctive flight calls that audio detectors could pick up to trigger a shutdown of wind turbines in the vicinity.

RRAS is grateful for the opportunity to review this DEIR. Clearly, we are in favor of renewable energy projects; otherwise, climate change will result in even more extensive bird mortality. We advise that the applicant for this major project not continue to rush the process, but rather take the time to carry out additional survey work to properly document the affected bird populations, carefully analyze the project impacts and include all the proposed mitigation measures in a revised DEIR.

O16-7

Please feel free to contact me at [harrieth6@gmail.com](mailto:harrieth6@gmail.com) if you or the project applicant have any questions regarding this letter.

Sincerely,



Harriet Hill, Board Member  
RRAS Board of Directors

A MEMBER OF THE NATIONAL AUDUBON SOCIETY