



June 10, 2019

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

RE: Humboldt Wind Project DEIR <https://humboldt.gov/2408/Humboldt-Wind-Energy-Project>

Dear Friends:

We are writing to express our concerns regarding the proposed Humboldt Wind Project LCC, DEIR, and the project’s potential impact on birds, particularly the federally protected Marbled Murrelet, Golden and Bald Eagles, California Horned Lark, and other bird species of conservation concern.

American Bird Conservancy (ABC) is a non-profit membership organization whose mission is to conserve native birds and their habitats, working throughout the Americas to safeguard the rarest bird species, restore habitats, and reduce threats. ABC supports the effort to combat climate change, decrease air pollution, and reduce our dependence on fossil fuels through responsible “Bird-Smart” renewable energy development. As you know, however, wind turbines kill birds, which is particularly concerning when the species affected are listed as Endangered or Threatened under the Endangered Species Act (ESA).

01-1

ABC’s Bird-Smart energy approach seeks to mitigate the danger to birds by encouraging the adoption of the following six principles:

- (1) proper siting of turbines away from bird high-risk collision areas;
- (2) independent, transparent pre-and-post-construction monitoring of bird impacts;
- (3) effective construction and operation mitigation by wind energy facilities to minimize bird mortality;
- (4) compensation to reduce and redress any unavoidable bird mortality and habitat loss from wind energy development;
- (5) environmental compliance with a rigorous local, state, and federal regulatory framework; and
- (6) evaluation of wind energy as part of a complete analysis on all feasible renewable alternatives.

01-2

The [Humboldt Wind DEIR](#) does not follow these recommendations and ABC accordingly cannot support Humboldt County Planners in the proposed action for this project. As currently proposed, the project will cause irreparable damages to listed species. In particular:

(1) The project does not attempt to minimize siting in high-risk areas. On the contrary, it proposes to construct an array of 60 turbines of 155 MW on Monument and Bear Ridges, which will create a lasting barrier to breeding Marbled Murrelets in their breeding season commute during chick-rearing from the sea, through the Eel River drainage and into one of the largest continuous tracts of ESA-designated critical habitat within the region at Humboldt Redwoods State Park. The project is situated within 5 miles of the Redwoods State Park. The DEIR does not even address the collision hazard risk to Murrelets along the proposed 25-mile 115 kV gen-tie utility lines along Shively Ridge.

01-3

(2) Pre-construction surveys were inadequate (covering only 75% of the footprint surveyed) and nevertheless indicate high risk to Murrelets and Eagles. Based on the MAMU report (Appendix N), the entire potential area was not surveyed by radar for potential risk of collision, notwithstanding the regular movement of Murrelets in the area, suggesting a corridor for transits of nesting murrelets. The collision rate estimates are also questionable based on other studies.

No specific data is presented for the model of estimated take numbers of Murrelets (20-24 birds) , and this estimate seems low given the frequency of detections at sites with radar.

The assessment of risk to raptors and eagles (Appendix E) was inadequate. Pre-construction surveys for raptors indicated that many species occur regularly in the area. Both Golden and Bald Eagles were present at the site at the time of surveys, and are known to nest in the area (Appendix E), and yet no take estimates are presented for these species (despite their federal protection under the Bald and Golden Eagles Protection Act).

01-4

(3) Crepuscular curtailment is not enough to minimize impacts to Murrelets, and should be extended during the breeding season. Murrelets fly into the tree stands (landward) in the dawn/dusk time window, but they return to sea at other times during the day. In particular, when feeding their chicks, adults fly back and forth at all times of day (Hamer and Nelson 1995)ⁱ. Therefore, full curtailment during the breeding season (during all hours of the day and night) should be mandatory for all sites in Marbled Murrelets territory.

In addition, acoustic surveys and MOTUS tagging efforts should be used to augment the understanding of potential impacts to this local breeding population.

(4) The proposed compensatory mitigation is inadequate to minimize risk of take of Murrelets (curtailment, minimization efforts). The primary threat to Murrelets in this region is loss of suitable nesting habitat, and yet there is no mitigation for acquiring additional habitat to provide greater protection for the species.

01-5

(5) It is not clear if the project has undertaken the Federal compliance review (Section 7) needed for Marbled Murrelet, and additional review with respect to take permitting under the Bald and Golden Eagle Protection Act.

(6) It is not clear why the scale of this project is so large, given the local population size and energy demand in the local region.

01-6

For these reasons, ABC we cannot support this project. The Murrelet population is in already in grave decline and this project, proposing the take of 20-24 birds per year, would contribute significantly to that decline.

01-7

Thank you for considering these comments. Please contact us at sholmer@abcbirds.org, if you have questions or if American Bird Conservancy can be of further assistance.

Sincerely,



Hannah Nevins
Seabird Program Director
American Bird Conservancy



Steve Holmer
Vice President of Policy
American Bird Conservancy
<https://abcbirds.org/program/wind-energy-and-birds/>

¹ Nelson, S. K., & Hamer, T. E. (1995). Nesting biology and behavior of the Marbled Murrelet. In: Ralph, C. John; Hunt, George L., Jr.; Raphael, Martin G.; Piatt, John F., Technical Editors. 1995. Ecology and conservation of the Marbled Murrelet. Gen. Tech. Rep. PSW-GTR-152. Albany, CA: Pacific Southwest Research Station, Forest Service, US Department of Agriculture; p. 57-68, 152