

Humboldt Wind Project Planner  
County of Humboldt  
Planning and Building Department, Planning Division  
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11 May 2019

Subject: Response to the Humboldt Wind Energy Project Draft Environmental Impact Report

To whom it may concern,

On behalf of the North Coast Bat Working Group, we would like to thank you for receiving and considering our comments on the Draft Environmental Impact Report (DEIR) in the development of the Final Environmental Impact Report (FEIR) for the Applicant-proposed (Humboldt Wind, LLC) Humboldt Wind Energy Project (Proposed Project) located between Fortuna and Garberville in Humboldt County. The North Coast Bat Working Group is a group of government agency staff, consultants, professors, and students that have an interest in bats. We are in favor of exploring and developing alternative energy while implementing prudent measures to avoid and reduce all potential impacts on natural ecosystems.

The Proposed Project has many potential impacts on biological resources with one of the more notable being direct mortality of bats due to collision with turbine blades. In a study to assess wind turbines effects on bats, it was determined that mortality from wind turbines may pose a substantial threat to migratory bats by drastically reducing the population size and increasing the risk of extinction (Frick et al., 2017<sup>1</sup>). For example, this study noted that hoary bat populations could decline as much as 90 percent in the next 50 years. Mortality of a high number of bats in a relatively short period of time (e.g., seasonal migration) or mortality to individual bats over a long period of time (which may occur during daily foraging migrations), may result in population-level impacts, which could result in a potentially significant effect to the resource under CEQA. This would be an unacceptable risk to the resource.

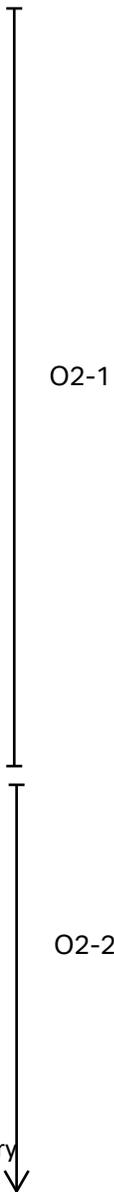
Below are comments on the 2018 surveys and the impact analysis and proposed minimization measures.

2018 Surveys

- Acoustic monitoring surveys conducted May through October did not include year-round surveys in the Project Area; therefore, the baseline information provided in the DEIR is

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<sup>1</sup> Frick, W.F., Baerwald, E.F., Pollock, J.F., Barclay, R.M.R., Szymanski, J.A., Weller, T.J., Russell, A.L., Loeb, S.C., Medellin, R.A. and McGuire, L.P., 2017. Fatalities at wind turbines may threaten population viability of a migratory bat. *Biological Conservation*, 209, pp.172-177.



incomplete and does not represent seasonal activity of late fall through early spring, a period when bats are known to be present in the area.

- Bat acoustic monitoring data collected were not representative of the habitat types present throughout the entire area that would be impacted by the Proposed Project, including transmission line corridors.

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#### Impact Analysis and Minimization Measures

- To reduce impacts on bats, the Proposed Project should implement operational mitigation (curtailed energy production) during high-risk periods to minimize bat fatalities and reduce the probability of long-term population-level effects on bats. The FEIR should clearly identify when this mitigation would be implemented (e.g., at what wind speed, times of year, levels of bat or other wildlife mortality). As noted in the DEIR, bat activity was significantly higher on calm nights, when winds were less than 6 meters/second (page 16). As part of the Proposed Project, the applicant should identify a wind speed where turbines would not be in operation in order to reduce population-level impacts on special-status and non-special-status bats to less than significant. Also, curtailed energy production should be implemented once the turbines are in operation and not be deferred while obtaining information on baseline mortality rates.
- Incorporate bat acoustic deterrents into the Project design, including best available technologies which may include installing speakers in the rotor blades to cover the entire sweep area.
- Any roadside and transmission line vegetation removal (including trees) should be held to the same standards as that identified in areas surrounding the turbine areas. Minimization measures to reduce impacts on bats during vegetation removal should be applied to the entire Proposed Project area to ensure a less than significant impact on bats.
- Proposed future surveys should be conducted by an independent bat biologist approved by the California Department of Fish and Wildlife (CDFW).
- Please provide scientific evidence for proposing the creation of artificial basal hollows as mitigation for impacts on Townsend's big-eared bats.
- The DEIR did not analyze impacts on bats and invertebrate prey from the clearing of habitat and use of herbicides.
- Minimization measure 3.15 (pages 129 through 132) identifies that CDFW that should approve the design of the replacement habitat. In addition, a CDFW approved bat biologist should also approve the design.
- Mitigation Measure 3.5-18b should include additional information on the mortality surveys, such as the definition of the search circumference. The mortality search area should be based on the rotor's circumference plus a defined distance to account for scavenging remains (e.g., 84 m<sup>2</sup> (900 ft<sup>2</sup>) [Spradley et al., 2012<sup>2</sup>]).

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<sup>2</sup> Spradley, M. K., Hamilton M. D., Giordano A. 2012. Spatial patterning of vulture scavenged human remains. *Forensic Science International* 2019 57–63.

- Mortality search surveys should include the use of detection dogs to increase the probability of detecting remains.
- What mitigation measures are proposed for clearing habitat to create up to 17 miles of new roads and up to 200-foot-wide expansion of existing roads (Page 2-8, Table 2-1)?
- Due to the potential impact on special-status and non-special status bats, CDFW should be allowed to access the Proposed Project area without restriction.
- The Technical Advisory Committee (TAC) should be expanded to include additional qualified scientists specializing in bat windfarm research.
- The DEIR does not address potential impacts on non-special-status bat maternity (roost where reproductive females bats give birth, nurse, and wean their pups) and hibernacula (roost where bats take shelter in the winter) colonies. Disturbance to these roosts has the potential to result in population-level impacts, which would result in a significant impact under CEQA.

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(Cont.)

Thank you,



Lauren Dusek (and the signatories listed below)

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1. Christine Champe



2. Gretchen O'Brien



3. Amon Armstrong



4. Ken Mierzwa



5. James McIntosh

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6. Genevieve Rozhon

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7. Trinity Smith

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