

Sent via email to jford@co.humboldt.ca.us on date shown below

September 12, 2019

Director John Ford
3015 H St
Eureka, CA 95501

Dear Director Ford,

On behalf of the Environmental Protection Information Center, Northcoast Environmental Center, Humboldt 350, Friends of the Eel River, North Coast Chapter of the California Native Plant Society, Redwood Region Audubon, and Redwood Chapter of the Sierra Club, please accept this letter on the proposed Terra-Gen wind project.

Our organizations urge rapid action at the local, national and international scale to address our climate crisis. In Humboldt, emissions associated with electricity use account for approximately 13% of total county carbon emissions, according to the county's forthcoming Climate Action Plan. We encourage the development of clean energy projects but recognize that wind energy development can have detrimental impacts to the natural environment. In most circumstances, these impacts can be minimized and mitigated to acceptable levels through sound planning, siting, and imposition of the best available technology. Here, as acknowledged in your draft environmental impact report, given the largely undeveloped landscape and presence of at-risk species, the Humboldt Wind Project will have significant impacts to the environment. At present, these impacts have not been minimized or mitigated to an acceptable level. While some of our organizations support the "No Project" alternative, others could support a modified project. Should the project move forward we unanimously insist that the following conditions be met:

- **Move Turbines Off Bear River Ridge.** The turbines on Bear River Ridge are the most impactful, both to the environment and to human communities. Bear River Ridge is home to Humboldt's isolated and unique population of horned larks, sits entirely within the Cape Mendocino Grasslands Important Bird Area, and is home to the majority of the rare plant species in the project area. What's more, the area is culturally significant to the Wiyot Tribe, who have voiced their opposition to placing turbines at this sensitive location.
- **Minimize and Mitigate Impacts to Ecosystems and Sensitive Species.** It is imperative to complete all survey protocols before the EIR concludes to best understand the nature

and magnitude of wildlife impacts. Regardless of design, the project is likely to result in the “taking” of sensitive species and will impact overall ecosystem function. That said, these impacts can be minimized through smart design. The best way to minimize impacts is to stop operation when sensitive species are present or during survey-defined high-risk periods. Operational curtailment is an industry-standard approach to mitigating wildlife impacts and is a part of other Terra-Gen projects. Where impacts can’t be minimized, such as the conversion of forests to brushfields, the project should compensate by fully mitigating these unavoidable impacts.

- **Provide Adaptive Management Throughout the Life of the Project.** Wind energy is still in its infancy and we can expect significant technological advances throughout the life of the project (30 years). As technology advances, and our ability to reduce impacts and increase efficiency increases, the project should adopt emerging technologies and adapt to changing conditions. The project needs to include an adaptive management program that works to continually refine the project to reduce operational impacts. Adaptive management requires strong data. To that end, it is imperative to modify existing mortality monitoring to include canine-assisted searches or other emerging detection technology to ensure that adaptive management uses the best available data and that mortality data be collected throughout the life of the project. In providing adaptive management, the county needs to guarantee a neutral and transparent process for determining necessary project modifications.
- **Reduce Sediment Impacts to the Maximum Extent Practicable.** The project will require significant ground disturbance, a known cause of sediment pollution and landslides. Our organizations are concerned about the impact of this sediment pollution. To the maximum extent practicable, all ground disturbance should occur outside the wet weather period, defined as Oct. 15 to May 15. Further efforts should also be made to reduce impacts from the Gen Tie line, such as by using existing power right of ways and other steps to reduce new ground disturbance and forest fragmentation.

Thank you for your attention to our concerns. Should you have any questions, please do not hesitate to contact us at (707) 822-7711 or tom@wildcalifornia.org.

Sincerely,

Thomas Wheeler
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Environmental Protection Information Center

Larry Glass

Executive Director
Northcoast Environmental Center

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