



# FRIENDS OF THE EEL RIVER

*Working for the recovery of our Wild & Scenic River, its fisheries and communities.*

Thursday, November 14, 2019

Planning Director John Ford  
Humboldt County Planning Commission  
3015 H St  
Eureka, CA 95501

**RE: Wind Energy Project Proposed for Monument and Bear River Ridges**

Dear Planning Director Ford and Planning Commissioners,

Friends of the Eel River believes the proposed project must be further mitigated. Vital wildlife and habitat values can, and must, be protected without threatening the project's economic viability. Such mitigations are critical precisely because, with appropriate protections, the proposed project should be an important step forward in securing energy resources that do not contribute to climate change.

We see several areas where additional mitigations seem necessary and feasible. More protective operating restrictions to reduce harms to bats, raptors in general, and several specific bird species should be required as a condition of project approval. The transmission line still raises serious concerns, particularly around wildfire and the use of herbicides.

Additionally, FOER strongly encourages Terra Gen to work closely with the Wiyot tribe to identify and reduce potential impacts on cultural resources. Every effort should be made to avoid disturbance to cultural sites, and in general to avoid adverse impacts to cultural resources.

## **Wildlife Impacts**

Under the California Environmental Quality Act (CEQA) impacts must be reduced to a less than significant level where possible. Friends of the Eel River generally supports the proposed mitigations for ecosystem and species impacts suggested by EPIC (the Environmental Protection Information Center) in their letter of September 19, 2019.

As EPIC points out, additional mitigation measures can and should be adopted to reduce the threat the project poses to bats, especially hoary bats. FOER strongly supports EPIC's suggestions that the Planning Commission:

- 1) mandate restrictions on turbine operations to prevent bat impacts from the beginning of operations;
- 2) lower the "trigger" for additional protections to reflect a level of mortality that would not be consistent with broad population decline; and

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- 3) most importantly, not limit the curtailment conditions which the Technical Advisory Committee could require in the event the project continued to cause significant bat mortality.

In addition, FOER supports EPIC's proposed mitigations to provide additional protections for raptors, horned larks, marbled murrelets, and Northern spotted owls and their respective habitats. We also concur that improved mortality monitoring is an appropriate and necessary mitigation measure given the potentially significant wildlife mortality at issue.

### **Transmission Line**

FOER was very concerned by the proposal to route the transmission line, aka Gen-tie line, under the Eel River, and are glad to see that aspect of the project has been dropped in favor of a lower-risk overhead crossing aligned with an existing bridge.

However, we remain concerned at the increased risk of wildfire that may result from the Gen-tie line, as well as by the FEIR's admission that herbicides will be used to maintain the transmission line corridor.

The eastern portion of the Gen-tie line would pass through areas rated by Cal Fire as "Very High" Fire Hazard Severity Zone. The greatest hazard to human lives and communities appears to be around the town of Bridgeville.

FOER strongly suggests that **approximately the last two miles of the Gen-tie line be undergrounded**, starting approximately at the crossing of Alderpoint Road. This would both reduce wildfire risks in closest proximity to the community of Bridgeville, as well as impacts to terrestrial and aquatic resources. The cost of putting this portion of the line underground should be at least in part offset by the costs avoided by not drilling under the Eel River at Scotia.

As well, FOER asks that the Planning Commission **include an additional condition barring the use of herbicides to maintain the Gen-tie corridor within 500 horizontal feet of any Class I or II stream courses**. Any resulting additional maintenance costs are unlikely to render the project uneconomic, but will help to reduce impacts on aquatic systems already under significant stress.

Thank you for your careful attention to these matters.

Sincerely yours,



Scott Greacen  
Conservation Director