



**United States Department of the Interior**  
**Redwood National Park**  
1111 Second Street  
Crescent City, California 95531



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Memorandum

To: Rick Yarde, Regional Supervisor, Bureau of Ocean Energy Management

From: Steven Mietz, Superintendent, Redwood National Park

Subject: Humboldt Wind Energy Area Scoping Comments

The National Park Service (NPS) appreciates the opportunity to provide comment to the Bureau of Ocean Energy Management (BOEM) during the public scoping period for the Humboldt Wind Energy Area (HWEA) Environmental Assessment (EA). As stewards of public lands, the NPS protects resources through a variety of park programs and policies and also serve as active conservation partners with other federal and non-federal agencies and organizations.

Redwood National Park (RNP) staff attended the online Scoping Session held on the afternoon of August 24<sup>th</sup>, and have developed comments for your consideration. The NPS understands that the EA in development is focused on 3 areas:

1. The issuance of a commercial wind area lease(s) for energy production, collection, and transmission
2. Site characterization activities including biological, geotechnical, geophysical, and archeological surveys
3. Site assessment activities including development of one or more buoys to gather oceanographic and meteorological data

Our comments relate only to the first area above, the issuance of a commercial wind area lease(s). Our intent here is to provide the BOEM with an understanding of which park resources may be affected by the issuance of commercial lease(s) operations for this project, recognizing that there will be future NEPA completed on construction and operation of commercial wind energy in the HWEA. The NPS has no specific concern for proposed site characterization or assessment activities associated with this EA. The specific park resources that may be affected include:

Biological -

1. A wide variety of seabirds breed and spend part of their lifecycle in RNP. The marbled murrelet is listed as federally threatened and state endangered. The largest breeding aggregation in California is within the old growth redwood forests of the park. As marbled murrelets strictly

forage and rest near shore, they are not likely to interact with any operations within the HWEA. However, the inadvertent creation of artificial habitat for marine fish may be an attractant for near shore birds in what are normally pelagic waters, which may increase their exposure to wind turbines. Other seabirds that breed within the park (common murre, pigeon guillemot), three species of cormorants (Brandt's, pelagic, and double crested), and one gull species (western gull) all forage on congregations of marine fish as well.

2. Leach's storm petrels breed within RNP and will likely forage extensively within the Humboldt Wind Area, as they are strictly pelagic. Some may be at risk to injury and/or mortality, if commercial lease(s) are awarded that results in future construction in the wind energy area (connected action). While pelagic seabird species (e.g. albatross, shearwaters, skuas) are rarely found within RNP waters, they could be at risk to injury if commercial lease(s) are awarded.

#### Visual -

1. The nearest point of RNP to the HWEA is approximately 30 miles at Freshwater Lagoon beach. From this sea-level vantage point, the leasing of the HWEA may not be visible at all except for the very tallest structures. Elsewhere in the park, however, particularly in the southeast corner of the Bald Hills, where Humboldt Bay and the open waters west of Eureka are visible, commercial lease operation in the HWEA may be visible. This part of the park is approximately 45 miles from the eastern edge of the HWEA. If commercial leasing is awarded, it is anticipated that infrastructure would be seen by day or at night (lighting) from these remote areas of the park.

#### Cultural Resources and Section 106 NHPA—

1. The NPS understands that the Area of Potential effect for the current scoping process as considered under 36 CFR 800 will likely be limited to the HWEA geographic area, and that a separate Section 106 NHPA consultation process would be led by BOEM for future phases of the project if a lease or leases are approved. As such, the NPS anticipates a greater role in this and future planning and consultation under Section 106 NHPA.
2. The NPS anticipates that BOEM will consider and address any potential impacts to cultural and historic properties during this NEPA process including: visual effects to significant historic, archeological, and ethnographic districts within RNP; effects to submerged, intertidal and nearshore archeological resources; and consideration of effects to traditional cultural properties significant to Native Americans in whose ancestral lands the park is located, including Yurok and Tolowa people.

#### Future Wind Energy Lease Areas –

1. The NPS may have additional concerns if the BOEM is considering additional plans for development of Wind Energy Areas in addition to the Humboldt Call Area. Future WEAs proposed directly off the coast of Redwood National and State Parks may generate greater concern for park visual, biological, and cultural resources. The NPS respectfully requests early notification of plans to propose WEAs directly west of the park boundary.

We thank you for the opportunity to comment and would like to thank the BOEM for engaging diverse stakeholders and constituents in their Wind Energy Area leasing and development process. We look forward to receiving a copy of the Environmental Assessment and our continued engagement in this very important program and project.

Please feel free to contact Saylor Moss, Chief of Planning and Compliance at 707-498-4080 or by email at [saylor\\_moss@nps.gov](mailto:saylor_moss@nps.gov), if you have any questions regarding these comments.