

Bureau of Ocean Energy Management
Office of Strategic Resource Renewable Energy
760 Paseo Camarillo, Suite 102
Camarillo, CA 93010

September 12, 2021

Re: Humboldt Wind Energy Area (WEA), Environmental Assessment (EA)

Dear BOEM Management Team:

The following comments are provided in response to the call for public participation and comments to the Humboldt WEA, environmental assessment (EA) and National Environmental Policy Act compliance.

We the undersigned believe that the Bureau of Ocean Energy Management (BOEM) lease activity in the Humboldt WEA may have significant adverse impacts on migratory birds, wetlands and other natural resources that are unavoidable if leases are issued and must require full mitigation, compensation, or should be avoided by reducing the scale and scope of the proposed lease activity.

If leases are to be granted, BOEM must address the onshore adverse impacts of development of electric cable "landings", construction of a large terminal complex inside Humboldt Bay and related facilities, along with the combine marine and motor vehicle traffic (on shore and offshore transportation). The Humboldt Bay Harbor District (HBHD) has announced plans to permit and construct a \$400-500 million dollar dock and multiple terminal building project. The BOEM lease activity is the singular motivation stimulating development of a new terminal by HBHD. BOEM must acknowledge the growth inducing impact that their lease(s) will have on sensitive wetlands and aquatic habitats in and around Humboldt Bay.

Many avian species are likely to be directly affected by collision mortality caused by installation of wind turbines. Pacific black brant and other migratory waterfowl, as well as over 80 species of marine birds will be affected by "displacement and barrier" affects in addition to potential lethal direct affects. Brant, in particular, migrate over the Pacific Ocean directly into and out of Humboldt Bay, and are one of the most vulnerable bird species to offshore wind energy projects. Full mitigation, compensation and implementation of active collision avoidance mechanisms must be addressed in the EA. All new leases must require full compliance with the Migratory Bird Treaty Act, and should be done in consultation with the Pacific Flyway Council, California Department of Fish and Wildlife and U.S. Fish and Wildlife Service.

Descriptions of how extensive movement of the floating turbines and their mooring devices impact the benthic impacts due to yaw and pitch during high winds, tidal surges and storms should be addressed. Birds may not have the ability to adapt or avoid collisions due to the highly erratic movements that turbine blades make under storm conditions.

It is imperative that BOEM describe and implement monitoring activities before, during and after termination of wind turbine placement on lease areas to provide accurate data on the many adverse environmental impacts that the proposed wind turbines will have. Monitoring should be based on multiple sources of data collection conducted by qualified third party contractors and not rely simply on assumptions and computer based models, or the lease owner's staff. High technology radar systems

that will automatically shut down wind turbines when flocks of birds are detected should be considered as one of many avoidance measures to be required of lease holders prior to operation of new turbine installations.

We thank you for the opportunity to provide these comments on the Humboldt WEA.

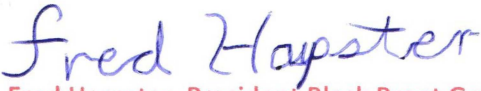
Sincerely,



Scott E. Frazer



Ted Romo



Fred Harpster, President Black Brant Group



CA Waterfowl Assoc.

