

## Applying Current CA Energy Commission Guidelines to the Proposed "Humboldt Wind" Project

The California Energy Commission (CEC) and CDFW developed the California Guidelines for Reducing Impacts to Birds and Bats from Wind Energy Development (Guidelines) to address coexisting and sometimes conflicting objectives:

- to encourage the development of wind energy in the state
- while minimizing and mitigating harm to birds and bats.

The DEIR includes Project siting and operational features that maximize *the Project's objectives*; however, the DEIR does not include or analyze in any detail potentially feasible siting, operational alternatives, and mitigation that would avoid or substantially lessen *the Project's significant environmental impacts*.

"CDFW continues to recommend that the DEIR include a more robust range of siting and operational alternatives, as discussed in its comments in response to the NOP, provided on August 30, 2018." (CDFW 2018)

"Based on our review of the Project's scope, the substantial ecological data on the Project site, and the site screening criteria in the Guidelines, CDFW concluded that *all or portions of the Project site fall into Category 4, "Project Sites Inappropriate for Wind Development."*"