

Elizabeth Burks, Planner  
County of Humboldt Planning & Building Dept  
3015 H Street  
Eureka, CA 95501

May 30, 2019

To Whom It May Concern:

Thank you for the opportunity to address what I believe is the main concern and problem with the Monument Ridge Scotia wind Turbine Project. This is a very poor location to build this project because of one word, FIRE.

I am concerned with the Draft EIR's failure to address FIRE as the direct causation of the "potentially significant: Wildland Fire", which is included under a chapter called Wildfire Hazards totaling 24 pages. The purpose of the DEIR is to determine whether the project should go forward and to inform the general public of the significant environmental effects of the project. I believe the chapter on wildfires omits informing the residents of Humboldt County of the real dangers caused by wind turbines.

The DEIR states that Wildfire is a potentially significant risk without clearly showing that the Wind turbines themselves will be the cause of such wildfire. CALFIRE is the State agency responsible for providing fire protection services and addressing this environmental risk for the DEIR. CALFIRE should be the agency that recommends "No Build" but instead the DEIR states "This direct impact would be potentially significant. CALFIRE does not support development in areas where there is no local agency fire services for structure fires and emergency response", instead they provided suggestions to mitigate risks related to wildfires.

Nowhere does this report inform the reader that FIRE is the second leading cause of catastrophic accidents in wind turbines. This is to say, it is not a remote chance of fire, but a "more likely than not" event to occur. According to Fire Safety Science, reported at the 2014 International Association for Fire Safety Science, fire data is inconsistent because the wind industry does not publicly report all fires. In fact, similar to the ornithologists, who believed only 9% of the actual bird deaths caused by wind turbines are being self-reported by the industry.

Nowhere in the mitigation measures, which appear to still be designed for small power plants, and not updated to cover wind turbines, does the requirement for fire suppression equipment to be installed on each and every single turbine as well as lightning protection systems.

Nowhere does CALFIRE mention the amount of flammable fuels in the nacelle which is the fuel load within a turbine, more than 200 gallons of hydraulic fluid and other lubricating oils and cleaning fluids. The base of the towers can also contain an additional 500 gallons of transformer oil. Yet, the mitigating measures address "clearing flammable fuels a minimum of 10 feet radius from poles and towers." (PRC4292).

The mitigation measures aim to reduce the impact from exposure to wildland fire to "less than significant levels", however, I believe history of other fires reportedly caused by wind turbines prove that not to be true.

I38-1



A few examples of such fires:

1. Lake Bonney, Australia January 22, 2006 electrical failure in the nacelle caused 63,000 homes without electricity and destroyed over 190,000 acres of national park by a wildfire ignited by the turbine debris.
2. Ardrossan, Scotland December 8, 2011 turbine fire caused by lightning scattered debris over long distances due to strong wind.
3. Parry Sound, Ontario July 18, 2018 An ATV used by the wind farm construction crew during construction when the forest was tinder dry caused parched grass to ignite and burn over 27,000 acres.
4. Capital Hill wind Farm, New South Wales, Australia January 25, 2017 Massive bushfire over 8,400 acres destroyed, hundreds of sheep and cattle, sheds and one home. Sites this is the 5<sup>th</sup> serious bushfire caused by wind farms in 20 yrs.
5. Juchitan, Mexico May 12, 2017 Turbine oil seeping into ground and throwing oil into trees.

The main causes of fire ignition in wind turbines are: lightning strike, electrical malfunction, mechanical malfunction and maintenance. The DEIR does state “increased fire risks associated with wind turbine generators include construction accidents, turbine malfunctions or mechanical failure”. By omitting the fact that FIRE is common and the second main cause of wind turbine failure, in my opinion, fails to inform the decision makers of the very real danger locating this project in the Redwood Forest.

No matter how well-equipped Rio Dell Fire Dept becomes, once ignition occurs in the turbine, the chances of externally fighting the fire are very small due to the height of the nacelle (590 ft) and the remote location of the wind farm. Under high wind conditions, burning debris will be carried to the surrounding forest and vegetation causing the wildfire referred to in the DEIR.

I believe this risk of FIRE is not “possible” but “probable”. The risk to Scotia, the community forest, Rio Dell, the Avenue of the Giants is too great to ignore and more than potentially significant. It is a risk that is **substantial** and **potentially devastating** to our community and cannot be reasonably mitigated. Therefore, the only conservative and realistic solution is to find another location for Humboldt Wind LLC where the Redwood trees, and personal property are not threatened.

**Addendum:**

The Executive Summary states if a project results in significant and unavoidable environmental impact that cannot be feasibly mitigated to less-than-significant levels, the project can still be approved, but the lead agency’s decision makers must issue a statement of overriding considerations explaining in writing the specific economic, social, or other considerations that they believe make those significant effects acceptable. I recommend, if this project is allowed to go forward in this location, the supervisors that vote for this, must be held responsible when the fire does consume the Redwood forest. There should be no indemnification for the County Supervisors that choose to ignore this very real risk and they must acknowledge that they have been informed of such. It appears that their overriding concern is tax dollars over the safe, well being of Humboldt County residents.

***Remember Paradise!***

Sincerely,  
Barbara Guest  
Redcrest, CA

**From:** [CEQAResponses](#)  
**To:** [Shortridge, Tricia](#); [Werner, Steve](#); [Ford, John](#); [Humboldt Wind](#); [Elizabeth Burks](#)  
**Subject:** FW: Humboldt Wind Energy Project Draft EIR  
**Date:** Thursday, May 30, 2019 4:54:29 PM  
**Attachments:** image001.png  
DEIR response.docx

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Thanks,



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Code Enforcement  
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[tevenson1@co.humboldt.ca.us](mailto:tevenson1@co.humboldt.ca.us)

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**From:** Barbara Guest <barbara@alsb.com>  
**Sent:** Thursday, May 30, 2019 4:48 PM  
**To:** CEQAResponses <CEQAResponses@co.humboldt.ca.us>  
**Subject:** Humboldt Wind Energy Project Draft EIR

Ms Burks,  
Thank you for this opportunity to respond to the Draft EIR.  
As you requested:  
Address: 1149 Holmes Flat Rd.  
Redcrest, CA 95569

I have not included the whole address on the word document as I do not wish this to be public. I also would have preferred to send a pdf, however, I am including my statement in Word as you requested.

Barbara Guest  
808-269-7480

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