

10 June 2019

Project Planner, Humboldt Wind Energy Project
County of Humboldt Planning Department
3015 H Street
Eureka, CA 95501

Dear Sir:

Terra-Gen LLC, a renewable energy company headquartered in New York City and owned since 2015 by private equity firm Energy Capital Partners, is currently and aggressively offering its wind turbine technology to Humboldt County. Not for free, mind you. No, it would come at a considerable cost to many residents in the county. Terra-Gen's proposal is, in its complexity and scale, an unprecedented construction project for Humboldt County. Accordingly, the required Draft Environmental Impact Report is long, dense and complex.

The word "draft" is definitely appropriate. A more accurate title would be a "Very Rough Draft EIR."

The language in this lengthy document is often too vague (as in the use of phrases like "will have to be studied later"), too lacking in relevant detail, and too fraught with careless factual error - sometimes disturbingly so, sometimes simply absurd. For example, "A dam is on the Eel River in Scotia." [Section 3.10 - page 3]. Really? Even as detailed (and lengthy) as the report is, it is difficult to accept it as an adequate document.

The prevailing assumption in this DEIR is that the placement of a new, sophisticated industrial technology on high windy ridges in the heart of Northwestern California's forests and high grasslands is environmentally safe. This assertion stretches credulity.

In recent years, devastating forest fires have increased in terrifying size and number across California. To construct and maintain huge industrial complexes in vulnerable fire-sensitive forests is not only naïve, it is grossly irresponsible.

Complicated industrial activity is fraught with high probability of careless accident and mistake. In present-day dry forest environments, one technical mishap or one human error can and will create catastrophe. Terra-Gen's representatives' verbal declaration at a public meeting that none of their turbines have ever caught on fire is not convincingly reassuring.

[It might be important to recall that even the supremely sophisticated technology of the US space agency NASA has had numerous and disastrous failures.]

Terra-Gen is not immune to failure.

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Considering "Viewshed" as an issue is certainly important to many local residents, but it is a very subjective concern and is often driven by selfish attitude. The primary issue should be the considerable impact of Terra-Gen's project on both the natural environment and the established urban infrastructural environment. As presented in the DEIR, the enormity of this impact is, frankly, shocking. Obviously, it will be at its most intense during the long, eighteen (possibly more) months of construction, but it will also reoccur periodically (and unpredictably) for the life of the project as replacement and repair of turbines is required.

The effects of this project on urban infrastructural environments are numerous. Alterations will extend down the entire course of Highway 101 from the streets and neighborhoods of Fields Landing to Jordan Creek in the region south of Scotia near Pepperwood. Impacts include reconfiguring areas adjacent to off-and-on ramps of Highway 101; creating bypasses in order to allow oversized vehicles to avoid bridges thus destroying verdant roadside environments of mature trees and vegetation; placing tremendous weight on freeway overpasses; causing serious damage to off-freeway roadways from frequent use by enormously heavy vehicles; compromising miles and miles of road surface on Highway 101 from the numerous trips made by these heavy vehicles (the costs of repairs to 101 to be paid for by taxpayers, of course).

As shown and described in the DEIR, the obvious and most significant insults are to the natural environment. The enormous reshaping of the landscape at the wind farm site is staggering in scale. 3,000,000 cubic feet of soil will be disturbed. A mountain must be greatly altered to accommodate massive, astonishingly heavy vehicles, including the cumbersome trucks specifically designed to carry turbine sections, the absurdly mammoth crane necessary to assemble the turbines, and a huge army of giant delivery trucks heavily-laden with large amounts of associated construction materiel. (There will be 10,000 to 14,000 truck trips over the 18-month construction period, each truck weighing 110 tons.) All of this machinery and equipment is to be dragged laboriously upward (by fossil fuel) through Jordan Creek's watershed on 17 miles of newly constructed, very wide roadway (200' in places) to the wind farm's location.

Terra-Gen's project requires exploitation of huge amounts of carbon-based fuel (1,000,000 gallons of diesel oil) during the construction. The turbines themselves will use substantial amounts of oil lubricants over the lifetime of the project. Thus, ironically, CO2 emissions will be used to destroy forest landscapes that sequester CO2. One can only conclude that reducing CO2 emissions is not Terra-Gen's truest priority.

Additionally, there is the 25-mile long, 100-foot wide swath of land and forest to be cleared and cut for the delivery of generated power to the PG&E sub-station in Bridgeville.

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From Fields Landing to a remote ridge top and then on to Bridgeville - Terra-Gen will create a trail of considerable environmental disturbance in order to reach its goal.

Sometimes creative thinking encourages and even requires "thinking big." But creativity is most often at its best when it develops clear perspective. And in this instance, clear perspective reveals Terra-Gen's project as callously destructive to urban and natural environments of Humboldt County.

Spokespersons' statements about the project's positive effect on global warming notwithstanding, Terra-Gen's prime motivation appears to be simply to produce electricity that in turn produces substantial revenue for itself and for its owner. That sort of financial arrangement has wrought chaos on landscapes all over the United States. We should not allow a disastrous industry-created environmental catastrophe to happen here in Humboldt County.

Yes, we are in a severe global crisis, but to destroy local environment to protect global environment is oxymoronic and meaningless. We can and must do better, but we seem not to know how.

The nurturing and expanding of forestlands is Humboldt County's best and noblest way of contributing to the solution of the many challenges brought on by global warming.

Concerning Terra-Gen's proposal:

From among the five alternative choices the County offers to citizens of Humboldt County in this DEIR, we choose "Section 6.3.5 Alternative 1: No project."

Yours sincerely,

Jere Bob & Carol Bowden

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I115-2
(Cont.)