

June 13, 2019

Humboldt Wind Project Planner  
County of Humboldt  
Planning and Building Department, Planning Division  
3105 H Street, Eureka, CA 95501

**RE: Comment on Terra-Gen Humboldt Wind Energy Project  
Draft Environmental Impact Report (DEIR)**

*Submitted via electronic mail to [CEQAResponses@co.humboldt.ca.us](mailto:CEQAResponses@co.humboldt.ca.us)*

Dear Responsible Official:

This letter is provided as comment on the Terra-Gen Humboldt Wind Energy Project (Project) Draft Environmental Impact Report (DEIR).

The DEIR is notably inadequate in numerous ways, and these inadequacies will require that the Humboldt County Planning Division either reject the Project outright, or at a minimum communicate to the Project proponent that more study is needed in order for the County to make any informed decisions on the viability of the project to meet stated goals.

There are many examples of how the DEIR makes either spurious claims regarding the environmental benefits of the project, ignores the ecological processes inherent in the landscapes for which the project is proposed, or fails to adequately describe the broader context of anthropogenic climate change.

For instance, on page 38-4 in the section on “Greenhouse Gas Emissions” an assertion is made regarding the impacts of climate change on California’s forests and the role of fire that completely ignores the evolutionary history of California’s forests and the deep relationship with fire. This ecological ignorance is at best dangerous, and at worst it was willfully done to misinform the public about the landscape and the ecological context in which this Project is being proposed.

The other glaring mistake in this section on “Greenhouse Gas Emissions” is the failure to even mention the greenhouse gas emissions from silviculture applications (i.e. logging). Forest degradation and land use change is an important dynamic to understand in terms of how climate change is a result of human economic activities, and how current economic activities in Humboldt County are affecting greenhouse gas emissions and thus the climate. To ignore the greenhouse gas emissions from logging is to ignore one of the major root causes of climate change.

This is but one example from a section of the DEIR that, while providing an extensive overview of the legislative framework related to climate change in the state, fails in the necessary substantive manner to provide an accurate and



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transparent accounting of the greenhouse gas emissions that would result from the development of this Project.

Whether it be the absence of an estimation of the greenhouse gasses from land use change in the development of the Project, or the failure to provide an estimation of the greenhouse gasses from the use of cement in the development of the Project, the section on greenhouse gas emissions in the DEIR is woefully inadequate and should be cause for alarm for decision makers regarding the accuracy of the DEIR in it's entirety.

As a matter of fact, apparently the words "cement" or "concrete," or any sort of recognition of how these materials are integrated into the project design, do not even appear in the section of the DEIR dedicated to "Greenhouse Gas Emissions."

This omission is all that more glaring because of the manner in which California law recognizes the fabrication of cement to be one of the most emissions intensive industries in the state. Though the Project design depends on massive reliance on concrete for construction, there is no apparent transparent and user-friendly effort to assess the greenhouse gas emissions that would result from the use of this material in Project development.

This failure to transparently and accurately portray the climate impacts of this project are not to be taken lightly, especially because it is exactly this question of responding to climate change that is presented as a justification for this project.

There are many other examples as to why the DEIR is fully inadequate in assessing the potential environmental costs and benefits of the project.

**At a minimum more study is needed in order for decision makers to be able to assess the viability of the project, while at the same time sufficient evidence regarding the inadequacy of the DEIR is available to result in a rejection of the project outright.**

Thank you for taking the time to consider this comment.



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