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To Humboldt Wind Project Planner
County of Humboldt
Planning and Building Department, Planning Division
Eureka, CA 95501

June 14, 2019

Dear Planning Director Ford and Members of the Planning Commission,

I submit these comments to you as my own opinion, and have identified relevant areas of the DEIR when possible.

Terragen proposes to introduce a ridgeline power project that would have a large effect upon regional wildlife. Both Bear River and Monument ridges are on the Pacific Flyway, whose migrating bird populations continue to be reduced by habitat loss and development. For Humboldt County, known for its wildlife quality, parks, hiking and camping opportunities—an industrial wind turbine installation such as this opens the door to encroachments on wildlife habitat and values and further degrades what richness this county does have.

I cannot argue, as I would wish today, that the project’s clean energy is a fair trade-off for the wildness loss, for the following reasons:

DEIR 3.5-48, 53-4, 58, 85, 109, 110

Although efforts are presented in the Draft EIR to minimize the turbines’ effects upon birds of known concern, marbled murrelets, eagles and the like, the fact is that many winged creatures in addition to endangered and threatened species will die—in particular Humboldt County’s bats, many not yet federally protected or listed. **DEIR 3.5-128 and following; 134-36.** The project’s effects on bat populations not now endangered is unknown—except for a large predicted mortality—likewise additional species which may be impacted are unknown. **DEIR 3.6-41** To propose stopping the turbines whenever a condor is in the region mocks the purpose of generating energy.

I205-1



Terra Gen can offer to partly protect parts of Humboldt’s identified wildlife but not the whole since it is not defined. If indeed the coming effects of rising atmospheric CO2 continue to intensify as predicted, Humboldt and surrounding regions of the Pacific NW may offer cooler and more intact habitat for wildlife driven out of other areas, and that habitat that would be negatively affected by an industrial wind turbines on key ridges.

I205-1
(Cont.)

Although the area proposed for the project is privately owned by HRC and a local rancher who has offered his land as a site for wind energy development—at least one tribe objects to this use of an area they consider to have cultural and sacred value (Wiyot). **DEIR 3.6-1.** Yet no mitigations are suggested in the DEIR to work with tribes, most of whom appear not to have yet responded, to minimize the project’s effect on sacred areas, to reestablish stands of native grasses and other plants once useful to the local tribes, or accommodate their land use preferences.

I205-2

In the public meeting held in Ferndale’s Steeple Church, TerraGen’s Kevin _____ claimed that no pesticides would be used to clear the site. This is preposterous even if the estimated 300 part time jobs offered are all weed whacking jobs! This project offers little in terms of good permanent jobs and/or tech training.

ES-1 The project would contribute a large percentage of clean energy to the BOS’ effort to be 100% sustainable by 2025. Yet it seems unlikely that a single large project will make our county 100% clean and green—Terragen’s calculations are clear on the wind energy to be reaped, but unclear on the considerable carbon costs of the project’s construction (concrete, gas and diesel used, rare earths used, etc.). **DEIR 3.8**

I205-3

The DEIR does not address irregularities in the climate and expected wind generation predicted in years to come. These uncertainties could fatally impact a large project. Despite their enormous cost, under today’s conditions, industrial wind turbines spin only about 40% of the time due to either malfunction, excess or insufficient wind speed.

I205-4

Should a fire occur high in the nacelle or on a blade, flying sparks could lead to a conflagration that county fire departments would be unable to fight.

The Triple Junction is one of the continent’s most unstable fault systems and likely at any time to experience a major shift.

In conclusion, I wish the County would solicit from Terragen, whose parent company specializes in ALL types of energy, **an additional alternative**, combining large with small energies proven to impact the environment less negatively: a mix of small hydro,

I205-5

parking lot solar installations, improved building practices with lower energy consumption. Since decommissioning is not detailed (a downside of many other communities' installations), **another alternative** is desirable: for Terragen to refurbish the turbines and hand over the keys to HC after 30 years to be operated as a local power source.

If the particular wind resources of these ridges are so great as to justify industrial wind turbines in wilderness, then other proposals will be made offering better terms to the County, less harm to the environment, more technical jobs and training, etc.

Sincerely, Lindsay Merryman

My husband and I retired permanently to Petrolia in 2008 where we built an off grid house. We were and are attracted to the area because of its wilderness qualities and wildlife, as well as by the fact that the population is so committed to these values that some 50% of households are off grid, powered by small hydro and solar.



I205-5
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