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to: Humboldt Wind Project Planner
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To Whom it may Concern:

This letter is regarding the DEIR for the proposed Terra Gen led “Humboldt Wind Energy Project”. I have to say that at this time I am in support solely of the “No Project” option. The reason I am writing anything is specifically due to a rather disturbing comment made by a Terra Gen Representative at one of the public meetings that they held. When someone asked for clarification about what would happen to the redwoods logged to suit their proposed gen-tie the representative stated “We do not plan to cut any redwoods, we are only cutting sequoias” I’m sure I don’t have to tell you that this is concerning given that it is fairly common knowledge that redwoods are Sequoia Sempervirens, which makes this statement made by someone claiming to be the Director of Permitting especially alarming. Most other inquiries were answered with “I don’t know, it’s in the DEIR.”

I have not read every word of the DEIR but what I have read is extremely disturbing. On one hand the project is attempting to be fast-tracked on a very short timetable so one would assume that there would be a plethora of resources used to build up the data-set. The reality is that section after section data is missing, out of date, skipped over, postponed to a theoretical future of “if possible” or done with gross assumptions. I feel this document is so incomplete as to not even qualify as a draft report, but rather a loose outline. I do not believe it is possible to adequately judge any of the proposals possible merits without it being completed. The more I have read the document and reviewed the public meetings, the more I see most of the questions answered with “I don’t know, It’s in the DEIR” were inquires for clarification on what little is actually in the DEIR.

My primary concern is with the proposed site and the surrounding collateral damage to the region. There are hundreds of scientific studies from around the globe about how grasslands and forests function as critical carbon sequestration sites. Many of the studies I have read on the topic specify that native flora grasslands have a greater efficacy at long term sequestration of carbon and greenhouse gasses than do grasslands comprised of standard introduced feed flora. Similarly there are a number of studies that cite Redwood trees, especially mature ones, as some of the most efficient trees for carbon sequestration and greenhouse gas reduction. There are multiple initiatives trying to plant redwoods both in and outside of California in efforts to fight climate change – but those newly planted trees will take decades to mature. There are no calculations or studies regarding how much carbon or greenhouse gas sequestration will be sacrificed by this modification of the land for what is, in truth, a very short lived temporary project that aspires to fight global warming. I believe that 30 years of this land remaining undisturbed and functioning as a greenhouse gas absorption and carbon sequestration site will do the environment far more good than thirty years of turbines will. I want to see these sequestration numbers included in the calculations of how much ‘carbon offset’ and ‘greenhouse gas emission reduction’ the wind turbines will allegedly bring. It is unfair to judge their impact without this data. I question why,

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when everyone else is so hastily planting these resources, we would seek to squander them; it just seems so unreasonable. Any and all Carbon footprint/greenhouse gas reduction calculations are incomplete without the inclusion of this data taken into consideration.

One of the more interesting aspects of redwood trees is how they will alter the air around them to optimize moisture levels in their canopies. While the trees are fairly drought resistant, I am concerned that the drying effect of the wind turbines of this scale in such close proximity to the trees will over time impair the trees. This effect could drastically affect our local climate and in turn place many of our sensitive species at increased risks. I would like to see studies on wind turbine draft effects on an isolated secondary growth redwood grove before any of our old growth groves are put in any possible risk.

Another red flag is that there is plans to clear-cut a large area of trees. This area has had issues with clear-cuts in the past and it would not be unreasonable to anticipate a new round of tree sitters should this project be allowed to continue. The proposed timber loss is expected to exceed all limits and restrictions currently in place on our logging industry for the time frame. In addition to disregarding our timber industry regulations there is no mention as to what will happen with the timber they plan to remove. Will they burn it and release all the stored carbon back into the air? Perhaps ship it off and sell it for a princely sum that lines out of area pockets and removes funding from the future of the local economy? I find it unreasonable that there is no mention of the plan details in this regard.

My home has a view of the project sites and I am extremely concerned about the night lighting and shadow flicker effects of the turbines as I have non-epileptic photosensitive seizures. There is no way to completely block the shadow of Bear River Ridge from my bedroom view without removal of all windows – which would violate building code regarding legal emergency egress points from a bedroom space. With the random nature of the wind it is impossible to predict the frequency at which the turbines might affect my health, whether I am in the safety of my home or anywhere else from which Monument and Bear River Ridges are visible – which is most of the coastal region of this area.

The photographic mock-ups Terra Gen has created make their proposed wind turbines look smaller than the ones Shell Oil wanted to put up some years back – yet are supposed to be significantly larger. They also attempt to make 3-600ft structures look dwarfed in proximity to the Doppler Tower which we know to be less than 130ft in height and stands extremely visible across much of the region. I find this level of inaccuracy to be unreasonable for a company of this caliber to be producing.

I find the bird surveys to be woefully inadequate to our region. They do not cover the totality of the affected area and what areas are covered are studied with minimal effort. Humboldt is famous for our birding opportunities, we regularly have tourists coming in and seeing dozens of species, several of which are hard or impossible to see anywhere else. Yet somehow trained researchers cannot seem to find our birds. Is it unreasonable to expect better results from trained professionals than it those from casual enthusiasts? There are 7 of the 12 birds from the “California State Fully Protected Species” that live in this region and are likely to be impacted by various aspects this project. Most are not even mentioned as possible concerns in the DEIR. Terra Gen has a track record with other wind farms of incidental take of one of these – the California Condor. I would remind the county that take permits for fully protected species are not permissible under current state law. Terra Gen has “Mitigated” this issue for the Altamont windfarm by connecting with researchers to gain access to when radio-tagged Condors are near the farm, initiating turbine shutdowns for bird safety. Terra Gen tries to wiggle on the issue of the Condors by describing them as “Experimental” and claiming that exempts them from the

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law. I have concerns that as the birds age, are injured and breed, the protective radio signals will be progressively lost leading to more condors cut down by turbines.

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The Marbled Murrelet “mitigation” suggestion is to reduce corvids – a technique that has been tried and failed repeatedly to increase Murrelet population. While Murrelets are a notoriously difficult species to study, we do know that many of them fly over Monument and Bear River Ridges repeatedly throughout the day to travel between their nests and their feeding grounds. This is especially prevalent during the season in which they are rearing the young. These birds breed slowly and the loss of even one adult to a turbine is likely to doom a nestling as well. These birds are not large, they fly well within the proposed height range of the propellers, and as they often travel at around 70mph on the journey over the ridges they are very difficult to detect. I do not see any reasonable way to protect them from a bunc of turbines placed directly in a primary flight corridor. Spotted owls also call home a large amount of area that is extremely close to much of this project. For these and many other species there is just not enough data to justify this project as safe for them.

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I am concerned about the damage to our scenic roadsides. 101 has many plantings some natural some intentional and daring back decades. This project proposes to flatten out and destroy many of these simply because they want to use equipment and haul components that are too large and heavy for our existing road structures. Further they want to widen multiple small roads that are already expensive to maintain with the frequency of landslides and winter rain washouts. We still have public parks marred by century old logging roads because our natural plants succession patterns are slow to reclaim disturbed land. I fail to see adequate details on how these temporary changes to our roadways are expected to be minimal.

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Further, the number of diesel vehicles required for construction and maintenance of these structures as stated in the proposal might not seem like much to people from smog filled regions, however they raise concerns about the damage to our air quality, particularly as they are projected to need our current diesel importation multiplied to meet their need. More diesel shipments means more risk of spillages in the bay. I am also appalled by the attempt to amortize the emissions damage to our air basin from the construction phase over the full life of the project. Emissions don’t work like that. They happen instantly and while it is possible to mitigate them over time, they also compound over time. Their effect cannot just be smeared over an extended time-frame. This all needs to be reworked. I am also disturbed by the casual planning to restrict public access to multiple roads. This is a rural area and access loss, even briefly to any one of our roads can have significant impacts on the local communities.

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We have all seen the state ravaged by wildfires in recent years. I have spoken with various people in and among our local volunteer fire fighter houses. Every single one of them has expressed concern about the fire risks posed not only by these turbines themselves, but also by the 25 miles of proposed gen-tie line. The Paradise Fire is very fresh on everyone’s minds right now. Terra Gen has admitted that the technology to fight a flaming nacelle at the proposed height ranges doesn’t exist. Yet they also claim their skeleton crew of maintenance workers will be trained and prepared for all such eventualities, yet they do not describe what this training will entail. Concern for wildfire in this area is especially high given the rare and delicate nature of the nearby landscapes. I do not find it unreasonable to consider the optics of what would happen should the Avenue of the Giants become caught up in such a fire. I am aware that most of the trees would likely survive with new scarring, but it would speak very ill of our land husbandry.

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I question the length of the gen-tie proposal. As the DEIR is written the power generated is expected to travel at a 12 percent loss over 25 miles before even entering the main grid. Now if that brought it

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closer to a major population hub it might make sense, however this plan bypasses multiple substations that are significantly closer to the generation site, as well as much more densely populated. Running the power over that great of a distance only to need to backtrack it after it hits the grid before it can even enter homes and businesses is a wanton waste of a resource. It makes absolutely no rhyme or reason to send the power away from nearby populations that could use it.

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Overall this project is unreasonable for this area. It needlessly harms multiple environments that are already at risk from human encroachment. The size and scale of the proposed wind turbines is drastically out of touch with what will work for this region. This is a rural county that would be far better served by multiple small wind and solar projects where the majority of power generated is used within a very short distance from the source. Smaller turbines are more efficient and less damaging to the fauna. I'm sure a 60 story turbine might not seem like much to folks that live in areas where skyscrapers are common, but other than our Doppler station, it's difficult to find any tall buildings in this area. The tallest one I can think of locally is the courthouse at about 7 stories, and it's an outlier. The vast majority of buildings in Humboldt are under 3 stories in height. I know many folks who cannot even begin to imagine the height of a 60 story object.

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There are no appreciable number of jobs attached to this project. Tax income is expected to be relatively low as Terra Gen only leases the land. The project is full of significant and largely unmitigatable impacts and incomplete plans. Even insofar as to provide size ranges for possible turbines but do not list any specific makes or models under consideration. There is also no plan for how to regulate the irregularity of the wind power by having a related facility ramp production up and down to make up the differential. None of our current power sources are capable of this variable of production without increased cost in emissions. The energy produced is expected to average out (high production times, low-no production times and transmission loss) to a mere 40% of capacity. The Land as it is now will over the next 30 years be far more efficient at removing CO2 and other greenhouse gasses from the air than a bunch of wind turbines will offset. To say nothing of the amount of emissions that will be released in the process of putting the turbines up to begin with. Starting with a mere 3 million cubic feet of disturbed soil that can and will release some of the greenhouse gas already sequestered within.

The only reasonable option in the DEIR for this area is the No Project alternative.

Thank you for your time and service to the community.
Sincerely,
A. Roberts

