

From: [CEQAResponses](#)
To: [Werner, Steve](#); [Ford, John](#); [Shortridge, Tricia](#); [Humboldt Wind](#); [Elizabeth Burks](#)
Subject: FW: DEIR comments
Date: Friday, June 14, 2019 4:28:43 PM

Thanks,

Tasheena Evenson

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Code Enforcement
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-----Original Message-----

From: jcschaef@igc.org <jcschaef@igc.org>
Sent: Friday, June 14, 2019 4:01 PM
To: CEQAResponses <CEQAResponses@co.humboldt.ca.us>
Subject: DEIR comments

1734 Roberts Way, Arcata CA 95521
June 14, 2019

Humboldt Wind Project Planner
County of Humboldt
Planning and Building Department, Planning Division
3015 H Street, Eureka, CA 95501

Dear Humboldt County Planning Department:

I am submitting these comments on the DEIR, but in no way are these criticisms. In fact I find the document to be factual and thorough.

Section 3.2

As with other sections of the report, I find this coverage of aesthetic issues to be quite thorough, indeed more so than in previous documents. With regard to viewscape based on the history of Shell’s proposed power plant, opposed by some in Ferndale for reasons of appearance, I would offer a few comments.

Certainly the skyline will look a little different with wind turbines on the ridge. However I find that objection to be the worst of NIMBYism. If people object to turbines on the ridge, consistency suggests they should also object to power poles on their nearby streets.

I220-1

Working for Electric Power Research Institute, various utilities, and government agencies, I was involved in various roles (research project manager, consultant, and expert witness) in the wind business since 1985. I found that residents near wind turbines did initially complain about how they thought turbines would look. After turbine installation, the vast majority of residents hardly noticed them and didn't complain any more about appearance.

What residents did complain about was the noise (for example, early on at the Altamont in California), and road damage (in Minnesota and Texas), and failure to shut ranch gates (Texas). However, I observe now that noise is now much reduced, probably because of blades with better aerodynamics. I stood 100 feet from a turbine like those Terra-Gen will install, in a field of dozens of turbines in Illinois a few weeks ago, and was pleasantly surprised at how quiet they were.

Terra-Gen has addressed the issue of road damage appropriately in the DEIR and I trust they'll shut gates behind them.

Section 3.8

It's a small point, but the statement in section 3.8 "GHG emissions have the potential to adversely affect the environment" fails to express adequately the damage that climate change is already causing. It's not just the potential to affect the environment. Rather, the effects of climate change are already devastating in California. Not to take immediate steps to reduce GHG emissions as soon as possible would be foolish.

Impact 3.8-2 understates the project's contribution to GHG reductions in its statement "less than cumulatively considerable contribution to the significant cumulative impact of global climate change."

The use of PG&E's average of 0.133 MT CO₂e per MWh (PG&E 2018) (page 3.8-18) understates the project's GHG reduction because virtually all of the energy replaced will come from natural gas. Thus, the number should be based on PG&E's marginal generation from natural gas. The California Public Utilities Commission (CPUC) in its ClimateSmart program suggests an approximate rate of 0.524 lbs CO₂ per kWh, or about 0.24 MT per MWh. Moreover, the marginal gas usage and average will be much higher after Diablo Canyon shuts down in 2024.

It's an insignificant point, but the statement "The O&M building would also consume natural gas for space and water heating for the proposed employees" (p 3.8-17) is probably incorrect. Space conditioning will almost certainly be done with propane or electricity.

Economics and employment

While it's apparently not a required component in the DEIR, I would note that in my observation operation and maintenance personnel I met working on wind farms throughout California were universally enthusiastic about what they were doing. Humboldt County would be well advised to encourage jobs like those. Part of that enthusiasm was due to workers' understanding that they were doing good for the planet.

Sincerely,

John Schaefer PhD

I220-1
(Cont.)

I220-2

I220-3