

14 June 2019

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

By email

Dear Friends,

I am writing regarding the DEIR on the proposed Terra-Gen windfarm

Over the decades I have studied and commented on many EIRs, and have yet to see one that lives up to what EIRs should be. Ideally, EIRs should be written by an independent agency, along the lines of the Congressional Budget Office, which assesses the effects of proposed legislation on the federal budget. Instead, EIRs typically are written by consulting firms that are hired by the lead agency, often with substantial input from consultants to the applicant. Too often, the agency that hires the firm that writes the EIR knows what decision it wants to make, and the firm sets out to justify that decision. Years ago, for example, I was on the board of directors of a public agency that needed to produce an EIR for a proposed dam on the Carmel River, that was favored by six of the seven directors. Our board got proposals from several consulting firms, along with statements of qualifications, etc. The cover letter for the winning proposal ended with approximately the following language: “Most importantly, [name of firm] is a client-oriented company.”

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Accordingly, I have little doubt that the EIR on the proposed wind farm understates the probable environmental impacts of the project, many of which cannot be mitigated. However, as an environmental scientist who learned the basic physics of global warming in 1970 and who understands some of the consequences of global warming, I have to support the project. If ever there were an overriding consideration, global warming is it.

In support of the opinion just expressed, I note that I have a Ph.D. in Geography and have published peer-reviewed papers on climatology, physiological plant ecology, hydrology, and fisheries, plus a monograph on Chinook salmon and steelhead in the Central Valley, and a recent book on environmental flow assessment. I also served on the board of directors of the Monterey Peninsula Water Management District, and as special master for an important water law case, EDF v. EBMUD.

Sincerely,

John G. Williams

