From:	Jesse Noell
To:	Planning Clerk
Subject:	Humboldt Wind CUP/EIR/feasiblity/overriding considerations
Date:	Thursday, November 21, 2019 2:55:25 PM

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to: Planning Commission
regarding Humboldt Wind Project

The position expressed by Michael Winker and reliad upon by Staff is unreasonable and is a glib and superficial misrepresentation of the facts. It provides only unsubstantiated opinion.

"According to Michael Winkler, Chair of the Board of RCEA, in statements made to the Planning Commission on November 14, 2019, producing a similar amount of solar energy would cost at least $800 million dollars (and possibly up to 1.5 billion dollars), more than four times the cost of this project. Further, solar production peaks in the summer, six months out of sync with maximum local demand which occurs in winter. Mr. Winkler also stated that RCEA staff is concluding negotiations with Terra-Gen for three quarters of the output of the project. If approved, the Terra-Gen project will produce more than 60% of the electricity used by RCEA's customers who represent more than 90% of the electricity customers in Humboldt County."

My 2.5 kw solar rooftop has produced 23,000 kwhours of electricity over a 15 year period, or an average of 1533 kwhours per year. It was installed by a licensed solar installer with permits. It has now paid itself off, in part due to afternoon peak power rates. Today this same system would cost about 1/3 as much and rates are higher so the payback would be sooner. The 70,000 house cost would be less than 1/3 of 980 million dollars which equals $326 million not Winker's 800 million to 1.5 Billion estimate.

Winkler glibly ignores the value of nano and micro islanding, economy of scale, equity and ownership of rooftop systems, electric vehicle conversion that is required to eliminate 60% of Humboldts' carbon footprint.

Winkler and the Staff's CUP conveniently forgot the 17-40% loss of power generated by the TerraGen project due to turbine power up losses, inverters, generator and switching losses and transmission line losses, the fact that the wind doesn't blow hard enough much or most of the time.

Heat released into the atmosphere and ocean is a major driver of climate warming and climate chaos; **TerraGen's 17-40% electrical power losses that release heat and a direct physical impact on the environment yet both Staff and Winkler have not declared TerraGen's heat releases to be mitigated to less than significant or analyzed for the feasiblity of mitigation, or overriding considerations.**

Solar panels have an albedo similar to rooftops or conifer forest so their contribution to hear release is minimal.

FINDING: EIR-ENVIRONMENTAL IMPACTS MITIGATED TO LESS THAN

SIGNIFICANT – "The EIR identified potentially significant impacts to

biological resources, cultural resources, hazards and hazardous materials,

hydrology and water quality, noise, transportation and traffic, **and wildfire**

which could result from the project as originally submitted. Changes are

incorporated into the project which avoid or substantially lessen the

potentially significant environmental effects identified in the Final EIR."

The risk of wildfire physical impacts to the environment caused by the project was not evaluated therefore the public has not been informed of how much heat and carbon equivalents will likely be released to the atmosphere as a result of the project. PGE typically causes about 2,000 fires per year, and as the information in public comments reveals, clusters of turbines cause many fires over their lifetimes.