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

November 21, 2019

Dear Planner and Planning Commissioners,

My name is Dr. Daniel Barton, and I am an Associate Professor of Wildlife Biology at Humboldt State, the director of HSU's Marine Wildlife Care Center, an oil spill response facility, and I study seabirds and other wildlife. I speak today as a private individual. I believe this project poses significant unmitigated impacts to Marbled Murrelet, raptors, and bats that, pursuant to CEQA, deserve additional analysis and consideration of mitigation alternatives before project approval. The California Department of Fish and Wildlife, along with American Bird Conservancy, California North Coast Chapter of The Wildlife Society, and EPIC have conducted thorough review and made substantive comments confirming this statement. Today, I am concerned with the applicant's claims in testimony provided to the commission.

Two weeks ago, the applicant stated, and I quote: "There are no more rigorous mitigations that are being employed on a wind farm in the United States today than on this project." This statement is demonstrably false. The Skookumchuck wind project (in Washington State) required seasonal curtailment for Marbled Murrelet, a suggested measure that was rejected in this project's Final EIR. Numerous other wind farms have voluntary and mandatory mitigations for a variety of species that exceed this project's, yet the applicant claimed this project was the most rigorous in the nation.

The applicant claimed the project would reduce petroleum fuel spill risk in Humboldt Bay, which is unsupported by any analysis in the EIR. The Humboldt Bay Generating Station is a natural gas-powered plant that uses very small amounts of pilot diesel fuel, with 100% diesel fuel backup capability. The station is only permitted (*NCUAQMD Title V Operating Permit*) to use 1,202 metric tons of diesel annually in its normal gas mode and approximately 3,500 metric tons of diesel annually in diesel mode. For comparison, during 2010-2016, 150,000-200,000 metric tons of petroleum products were received per year at the Chevron Eureka Terminal (*Humboldt Bay Maritime Industrial Use Market Study - Final Report*). Even if this project completely replaced the HBGS (it will not) the impact on petroleum shipping traffic would be minimal – I estimate, by volume, less than a 2% reduction, or well less than one barge trip per year. The applicant intends to barge wind turbines and infrastructure to Fields Landing in Humboldt Bay, resulting in an increase in vessel traffic and oil spill risk (although risk is low, *it is not zero*) and will need to use well over 1,000 metric tons of imported diesel during construction. I see no evidence of measurable benefits to Marbled Murrelet or other seabirds provided by this line of reasoning. I suggest disregarding the applicant's spill risk argument unless analysis demonstrating a reduction is provided.

Finally, the applicant made a bizarre and self-contradictory claim that project siting on Bear River Ridge resulted from a stakeholder-driven process. In the same testimony, the applicant said, quote: "A key factor why Bear River Ridge versus out near Bridgeville or Shively or Rainbow or Long Ridge the other many considerations locally that we factored in is that we couldn't deliver turbines. It's a pretty simple answer." Which was it? The applicant shouldn't claim environmental generosity for their siting choices if siting was driven by logistics.

I encourage the planning commission to consider all of the applicant's testimony cautiously. I also encourage the commission to consider the Wiyot people's comments ahead of my own – their concerns, as a sovereign nation of survivors of colonization and genocide that are now being asked to bear the burden of re-powering a world Europeans have so changed, should be paramount. Thank you.

Sincerely,
Daniel C. Barton, PhD

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