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protect Shasta County zoning ban on wind farms

Additional submitted attachment is included below.

Mr. Drew Bohan, Executive Director
California Energy Commission
715 P Street
Sacramento, California 95814

August 30 2023

Subject: Protecting the Shasta County Ban on Wind Farms

Dear Mr. Bohan

As you are aware Shasta County imposed a zoning ordinance banning industrial scale wind farms on all unincorporated lands in Shasta County. That ban was enacted primarily due to wind farm impacts on fire suppression efforts, native American tribal concerns and impacts to esthetics.

In a letter from Cox Castle to you, Ms. Anne E. Mudge notes that *“legislative history shows the Legislature enacted AB 205 to counteract a recent spat of permit denials, moratoria and zoning amendments by local agencies preventing the development of renewable energy facilities.”* (Cox Castle 8/21/2023). Perhaps local agencies have done so due to the fact that they know more of how to protect their citizens from ill conceived and resource damaging projects than the legislature. That certainly is the case in our county.

Shasta County is by in large a woodland forest ecosystem with vegetation that is “fire climax” in nature. That means that part of a plant species life cycle is dependent upon fire for regrowth and/or regeneration. In addition, due to lack of responsible forest management on the part of the US Forest Service, BLM and private landowners within the county there is heavy vegetative fuel loading from the forest floor to the tree canopy. As such, when a fire starts, if not contained quickly, it moves to the tree crown with rapid spread and catastrophic results in destruction of property, natural resources, and life. The cost of fighting such a fire is astronomical. The Carr Fire alone in 2018 burned through the town of Old Shasta and into the town of Redding costing \$158.7 million in suppression cost (Jergler. 2018) and \$1.659 billion in damages. State wide, the cost of fire suppression in 2018 was 148 billion (UCL statistics). But that is of little importance compared to the loss of people’s lives, two of which were fire fighters who died during the Carr fire-tornado with winds of over 134 mph (see attachments).

The key to preventing such huge fires is a rapid initial attack when a fire is small. The Redding Air Tanker Base is in our county for that very reason. When considering the Fountain Wind project, the county Planning Commission and the Board of Supervisors heard testimony from CDF air attack specialists and air tanker pilots stating that they cannot fly or drop retardant within a windfarm or the immediate surrounding area, thus taking away the most effective initial attack and fire suppression tool available. Fountain wind argues that their project will improve the ability to fight fire by creating more roads, increase personnel on the ground and water storage tanks. If those factors would really help contain or stop a large fire then the towns of Paradise, Greenville and Lahaina never would have been reduced to ashes.

As a member of the Shasta County Planning Commission, I and my fellow Commissioners cannot approve a project where:

“the establishment, operation and maintenance of the subject use, under the circumstances of the particular case will be detrimental to the health, safety, peace, morals, comfort and general welfare of the persons residing or working in the neighborhood or will be detrimental or injurious to property or improvements in the neighborhood or to the general welfare of the County” (SCC 19.92.20(F)).

So, the issue is not whether Shasta County is pro or con windfarms, but rather how do we protect the citizens *general welfare* who have already suffered immensely from catastrophic fires (In 2018 alone the Carr, Zogg, Hirz, Fawn and Delta Fire burned 361,971 (565.5 sq mi) Shasta County acres). In all good conscious there is no way to protect our citizens by approving a project that would put them in harm’s way by taking away one of the best firefighting tools available, aerial attack.

On a separate but related issue is CEC’s request to Fountain Wind for a cumulative effects analysis of the impacts of the project to the forest resource of the area. Surprisingly, Fountain Wind states that due to the difficulty of obtaining a permit (due to the county’s ban) it is unlikely that other projects would make application, therefore there would be no additional impacts to forest resources. In other words, “we don’t see the ban as important to us but it would deter others.” The reality is that if you approve this project, you will have effectively eliminated the ban and opened the door for other such projects, and certainly others would apply. So, the cumulative effects analysis issue has not been addressed as it would have to include an assumption that more sites would be developed, more forest resources would be impacted and more catastrophic fires would occur and more firefighting efforts would be hampered by more windmills. That is not an acceptable circumstance.

AB205 requires the CEC to take local ordinances into account, in this case the ban and SCC 19.92.20(F), and that special findings would be necessary to approve the project and override the ban and code section. Those finding would have to address economic benefit which is simply not the case as the cost of catastrophic fires in terms of dollars far exceeds any possible economic benefit from the project. In addition to the monetary cost, there is the cost to human life. If you decide to approve this project and overturn the Shasta County ban you will have to take the responsible for endangering the lives, property, and resources of our citizens. You will have to take responsibility for putting our citizens in harm’s way without resources upon which to defend themselves and you will further signal that regardless of the cost to the environment and the citizens you can build windfarms within dangerous fire climax forest ecosystems regardless of the hazards or cost. Making such a determination is completely irresponsible and dangerous.

So, I ask you, for the sake of the protection of the citizens of Shasta County and other rural counties, support us in our ban on industrial wind farms. It is the only reasonable thing to do.

Thank you for your consideration,

Steven J. Kerns,

Steven J. Kerns
Shasta County Planning Commissioner, District 3

Carr Fire tornado, 2023. Two firefighters died at this moment on the extreme right of the photo



Here is where they died



The results: Portions of the western edge of Redding are gone



References

Jergler, Don (2 August 2018). "[Carr Fire Losses May Reach \\$1.5B in Likely Another Destructive Season for California](#)". Insurance Journal. Retrieved 29 August 2018.

Shasta County Code: 19.92.20(F)

UCL. 2023. On line @ <https://www.ucl.ac.uk/news/2020/dec/full-cost-californias-wildfires-us-revealed>