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DULY PASSED AND ADOPTED this XX day of XXXX, 2022, by the Board of Supervisors of the County of Shasta, State of California, by the following vote:

AYES: X
NOES: X
ABSENT: X
ABSTAIN: X
RECUSE: X

LES BAUGH, CHAIR
Board of Supervisors
County of Shasta
State of California

ATTEST:

MATTHEW P. PONTES
Clerk of the Board of Supervisors

By: _____
Deputy

Comments for Shasta County Supervisors regarding the prohibition of large wind energy systems within the unincorporated area of Shasta County

I think it's a fantastic idea to prohibit large wind energy systems in Shasta County because these countryside monsters do catch fire on a regular basis. This is a real ongoing threat for all of Shasta County. At some point, it is likely that one of the Hatchet Ridge wind turbines will catch fire, so I hope fire crews will be able to minimize the damage.

People across the world send me videos of turbine fires several times a year. This link shows a recent one.

<https://www.facebook.com/richard.major1/videos/10110297277215878>

But besides the wildfire dangers from wind turbines and infrastructure, there are other very good reasons to forever ban these systems in Shasta County. This industry and our government agencies lie about nearly everything with these energy systems and it's at the expense of the public. Below is new factual information I have put together for Shasta County Supervisors that I want to be part of the official record.

The Interior Department's New Bald Eagle Take Numbers

America's green energy fraud has been going on for decades and as I have discovered, it never sleeps.

The Interior Department, with fraudulent research and has announced new imaginary bald eagle population estimates of about 317,000 bald eagles, New limits on the number of bald eagles that can be killed by industry each year have been increased to [15,832](#). The previous take limit, also created with fraudulent research, was set in 2016, at [4200 bald eagles](#) annually.

From [Federal Register](#)"Although some of the increase in the estimates of population size from 2009 to 2019 can be attributed to improvements in methods, the majority of the increase is likely due to population growth, estimated to be around 10 percent per year."

Improvements in "methods" really means, continue to ignore real world conditions dismiss the bald eagle habitat abandonment near wind farms like Hatchet Ridge and crank up the rigging for investors.

Not sure if the Interior Departments new eagle population estimates include Alaska or not but the population of [Alaska's bald eagles](#) is about 30,000. Alaska by leaps and bounds, has more bald eagles than any other state. Subtract that number from 316,708 and we are supposed to believe that on average, each of the lower 48 states has a population average of 5,971 bald eagles. In

California the bald eagle population doesn't even come close and we might have 1/3 this number, but no more.

Here in Shasta County, CA, we easily have the highest density of bald eagles in the state and the total population including juveniles is about 150. Except for occasional migrants, many of California's 58 counties don't even have bald eagles. My Estimate is that there could be 1500 bald eagles living in CA.

As for Having 5791 bald eagles living in Ca, at some point it could be possible but the turbines killing them off in at Altamont and in the Delta region, would have to be destroyed. As for each of the lower 48 states having an average population of 5,971 bald eagles, it's not possible and in fact, the state of Alaska is the only state with this number of bald eagles.

The Interior Department has lied about the bald eagle population for 48 out of the 49 states with bald eagles. Keep in mind, they also produced a [fake study](#) that overestimated a golden eagle population in central CA by over 10 times.

Green Energy's Hidden Eagle Slaughter

Recently an American wind energy company pleaded guilty to federal criminal charges after at least 150 eagles were killed since 2012. The company has agreed to spend as much as \$27 million on efforts to prevent more deaths.

The company has agreed to spend up to 27 million to prevent more deaths. What good is this? Except for shutting down turbines, there is no way to prevent eagle deaths from wind energy. This industry and the USFWS are very aware of this because wind turbines have been annihilating eagles for decades.

The truth is, these 150 dead eagles are only the tip of the iceberg and very likely represent less than 1% of this ongoing carnage. Back in 1997, when California was the only state with wind turbines in eagle habitat, the Denver Eagle Repository, reported wind turbines being one of their primary sources for their yearly 800 eagle carcasses. When compared to 1997, America now has 80 times more installed wind energy than it did back then 1997. Today, based upon Repository records released up to 2014, the Denver Repository now receives over 3000 eagle carcasses a year.

But with this green energy expansion came a new era of wind turbines. These new turbines invading eagle habitats, were also far more deadly. Early turbines had blade tips speeds that were 110-120 mph while tip speeds for new turbines have speeds twice as fast.

Why doesn't the public know about any of this?

1) Wind energy mortality disclosures are not required, scientific research is not required and all wind industry mortality research being conducted, is being staged.

- 2) In 1997, the Clinton Administration created new laws so this ongoing slaughter could be conveniently considered, a business trade secret.
- 3) In 1997, The Freedom of information Act was changed to protect this industry.
- 4) In 1997, Interior Department personnel were silenced and their employment required non-disclosure agreements with very strict penalties.
- 5) In 1997, the Denver Eagle Repository was silenced and no longer allowed to discuss the origin of their eagle carcasses.
- 6) Leaseholders in partnership with wind energy developers are also required to sign very strict non-disclosure agreements. These leaseholders are never allowed to discuss species mortality taking place from the wind turbines on their property. They're also required to immediately dispose of carcasses. Even with post construction mortality research, access by leaseholders and wind energy employees has never been restricted during studies.

6.2.5 Disposal of Animal Carcasses. Owner agrees to take all reasonable measures to avoid attracting scavenging birds and other animals by ensuring all animal carcasses on the Property are immediately (to the extent permitted by applicable law) buried, buried, adequately and completely composted by covering with an adequate amount of earth or mulch, cooked or placed in enclosed containers with lids if such carcasses will be removed at a later time from the Property. Animal carcasses shall not be left in open fields or adjacent to buildings and shall not be left uncovered or exposed.

Since 1997, nobody involved with wind energy and its eagle carcasses, has been allowed to disclose the truth.

Dead Eagle numbers

The Interior Department and USFWS claim that they keep no records for the origin of these eagle carcasses.

An Email I received from USFWS agent Jill Birchell in 2016, confirmed this government protocol of secrecy.

"Hi Jim,

I checked with our repository and learned that they don't keep detailed records of where the eagles they receive come from."

Up to the year 2014, the Repository did report eagle carcasses being received and processed. For 2014 they reported receiving 2309 eagle carcasses for dispersal to American Indians and noted others that had not been counted, which would likely bring totals to about 2400. Since 2014 the

numbers of eagle carcasses being processed for the Native Americans is no longer being given out.

NATIONAL EAGLE REPOSITORY ANNUAL REPORT: 10/01/13 – 09/30/14						
REGION	WHOLE EAGLES AND EAGLE PARTS RECEIVED			WHOLE EAGLE ORDERS FILLED	EAGLE FEATHER & PARTS ORDERS FILLED	COMBINED FILLED ORDERS BY REGION
			REGION TOTAL	BALD/GOLDEN	BALD/GOLDEN	
1			239	135	376	511
2			65	479	1,113	1,592
3	Iowa Region		591	129	357	486
4			352	24	114	138
5			229	24	110	134
6			492	170	519	689
7			216	3	13	16
8			125	62	240	302
TOTAL			2,309	1,026	2,842	3,868
NEW REQUESTS RECEIVED						
	BALD EAGLES	1,176				
	GOLDEN EAGLES	1,795				
	EITHER SPECIES	1,379				
	TOTAL	4,350				

NOTES: The incoming bird count is not complete as we are still evaluating birds received in September. The final total number of birds and bird parts received will probably be about 2,400. The total number of eagles and parts shipped, as well as the number of new requests received are complete as of 10/22/14. 2842 "parts" orders due to more eagles hit by turbines now being found more mutilated

But this eagle carcass story doesn't end with just Repository Eagles being processed for American Indians. There are many other carcasses because "clean" eagles are required for ceremonies; eagles that have died as a result of electrocution, vehicle collision, unlawful shooting or trapping, poisoning or from natural causes are unacceptable for ceremonial sacrifice.

In 2014 NBC did a story on the Denver Repository 2014. In this story about recycling eagles to American Indians, the repository reported that they had processed about 42,000 eagle carcasses. This Interior Department facility was opened in 1995.

<https://www.nbcwashington.com/news/local/protecting-eagles-in-life-and-death/1985909/>

In the interview discussing Wildlife Repository Specialist Dennis Wiist, this was revealed ... "But at last count, almost 42,000, he's touched nearly every eagle that's come through this facility."

Add another 8 years of receiving 2500-3000 eagles and about anyone past the eighth grade can come up with an estimate of over 60,000 eagle carcasses since 1995. It's hard to imagine and even harder to stomach, but over 60,000 eagle carcasses have secretly shipped to this repository, with no cause of death or origin given. When Shasta County approved the Hatchet Ridge wind project, this county became a part of this green fraud on America.

If federal prosecutors really wanted prosecute green energy's eagle kills

Even though the USFWS won't report the carcasses it would still be fairly easy to prove what's taking place with America's hidden eagle carnage through indirect means. Sort of like using cell phone tracking data to convict a murderer.

The prosecution of 150 eagles killed since 2012 is nothing to get excited about when nothing has been done about tens of thousands of other eagles killed by wind energy. America's silenced USFWS agents know exactly what's taking place because they process and arrange FedEx overnight shipping for nearly all the eagle carcasses shipped to the Denver Eagle Repository.

If federal prosecutors wanted the truth, a look into FedEx records would give investigators a very good idea what's taken place. From FedEx they would know the origin of shipments, they would see the proof of millions paid out by the US government for overnight shipping and the weight of crates would indicate the number of eagles per shipment. Surveillance on the Repository site in Denver would also clue investigators in on the number of Fed Ex shipments coming in per week.

Another way for prosecutors to get to the truth about green energy's eagle carnage, they could start interviewing leaseholders. I know of one case (have documents) where a dead bald eagle was found near a turbine and it was reported by someone that hadn't signed a lease. When agents arrived at the property, the eagle was nowhere to be seen because the leaseholder had already disposed of it.

At some point, if a Shasta County prosecutor wanted to do something similar with Hatchet Ridge, I could help them with a few other ideas.

Wind energy calculations that show 4-5 times less turbine energy actually being produced for the grid

Recently I looked into Wind energy's contribution to an isolated energy grid in Nome, Alaska then compared it to Iowa's glowing Wind energy production numbers.

As I discovered, green energy calculations have very little to do with reality. But by using "Green" energy math methodology and with the help from our politicians, Iowa is able to make claims about producing almost 60% of Iowa's electrical energy from wind.

It's not true, and an analysis of the grid in Nome, Alaska explains why.

11,660 megawatts

Iowa's wind generation capacity of **11,660 megawatts** in 2020 provided just shy of 60% of the state's electricity last year. EC highlighted the need to reach 11,000 megawatts of wind capacity by 2032 to stay on track for a 2050 goal of 100% renewable energy in our publication Iowa's Road to 100% in April 2021.

<https://www.iawenvironment.org/newsroom/energy-news>

[Iowa Nears 60% Wind Energy Generation Milestone - Iowa ...](#)

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This report from Alaska is extremely interesting because Nome Alaska has a completely isolated electrical grid. In order to survive, the people of Nome have to depend on diesel generators and an intermittent supply of wind energy. By the way, the winds around Nome are considered prime for wind power generation.

ACEP Technical Report

Nome Wind-Diesel System Overview

Chris Pike and Nathan Green

DRAFT Report – November 1, 2017

A report for the Alaska Energy Authority as part of the Renewable Energy Fund
Data Collection and Analysis Effort

Nome, Alaska

Nome has two Wärtsilä 5.4 MW diesel generators, which alternate to supply power. A 3.6 MW Caterpillar generator is used during the off-peak summer hours when demand is low; a 1.8 MW Caterpillar generator is used to augment peak loads during winter afternoons. A 0.4 MW diesel generator is used as a black start unit in case of a black out and can support lower temporary peaking requirements.

Presently, NJUS operates one of the most efficient diesel powerhouses in Alaska, with an average kWh/gal of 15.8 for the period of July 2015 through June 2016, according to power cost equalization (PCE) records.

Initially the Nome wind project consisted of eighteen 50 kW Entegritty turbines. After the full value of the tax credits was realized by Banner Wind LLC, the company sold the Banner Wind project to NJUS along with the long-term lease for the land, effective January 2015. In 2013, two additional 900 kW wind turbines were installed by the utility, using millions in funds from the Alaska Renewable Energy Fund program and a contribution from the local fishing community development quota program, Norton Sound Economic Development Corporation.

Today all of Nome's smaller Entegritty turbines have been shut down due to grid inefficiency and high costs. The project lasted about 10 years but the two larger .9 MW turbines still remain.

Nome Joint Utility System (NJUS) Assistant Manager Ken Morton:

"The cost to maintain the smaller units has increased to the point that the cost of the diesel fuel they displace no longer pencils out."

"NJUS does not at this time have plans to replace the turbines or add additional ones. However, if grant funding becomes available for additional turbines, as well as funds for a battery system that would allow for greater reliance on wind energy, NJUS would pursue that."

In 2021 the Nome Joint Utility System allocated funds to have all their [original 18 turbines](#) to be taken down.

Iowa Wind

So, what does all this have to do with Iowa?

Nome used real world numbers to determine the value and contribution from wind energy for their customers. A 2017 report (see image) said the [actual contribution](#) ("penetration") to Nome's grid in 2015, averaged out to a pitiful 6.3% (see image).

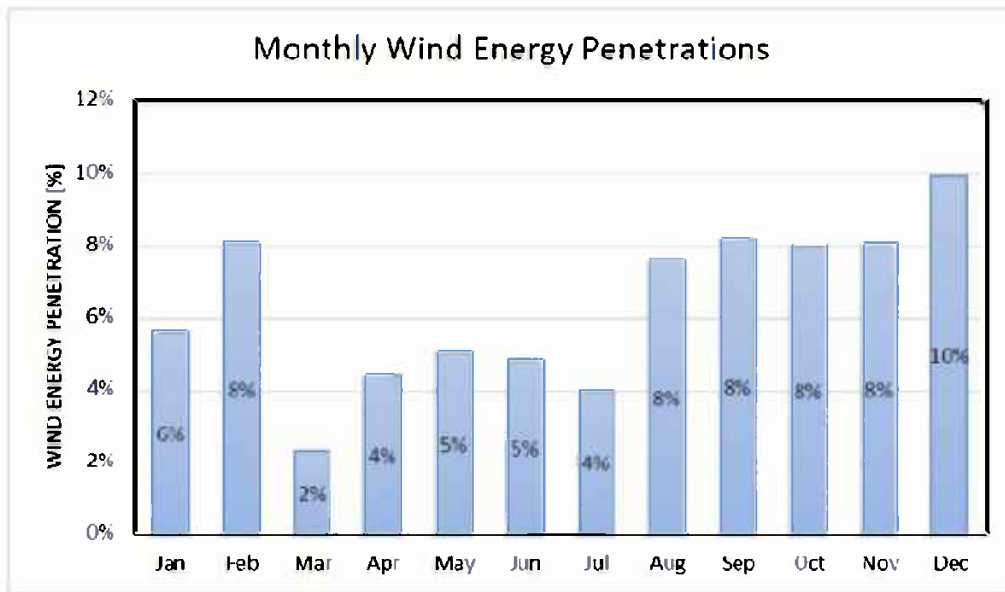


Figure 13. Wind energy penetration by month. To arrive at these figures, the total wind energy fed to the grid each month is divided by the total energy generation each month from all generation sources.

6.3 % yearly average

These are grid numbers and calculations never disclosed from America's other 49 states. The primary reason, Nome's utility district is trying to survive as efficiently as possible while developers and utilities in the other states are busy soaking taxpayers.

Nome Alaska 2015 electric profile

Wind 2.7 MW percentage of nameplate capacity 33%

Diesel 5.4 MW percentage of nameplate capacity 66%

Total 8.1 Wind energy's annual contribution to Nome grid 6.3%

With their baseload diesel generators compared to installed the wind energy nameplate capacity, Nome had an installed diesel to wind 2 to 1.

Iowa's 2020 electric profile

Wind 11,322.5 MW percentage of nameplate capacity 50%

Coal and other sources 11,147.9 MW percentage of nameplate capacity 50%

Total nameplate capacity 22470.4 MW

[Iowa](#) has an installed capacity ratio of about 1 to 1 when their baseload energy sources are compared to installed nameplate wind capacity. Iowa does have a greater

percentage of installed wind capacity than Nome. But if we double Nome's wind energy capacity to equal Iowa's 50% wind mix, the annual contribution Nome's utility would still only achieve about a 12.6% contribution to their grid from wind.

When compared to Nome, Iowa has far more energy transmission losses for wind energy because consumers in Nome are located only 4.5 miles from their wind farm. But assuming all things being equal, including annual wind speeds, Using the same the wind mix/grid penetration calculations from Nome, means that all of Iowa's thousands of turbines, still only contribute about 12-13% of the Iowa's usable energy to the grid.

In a previous post, I said Iowa, grid requirements need constant [base loads](#) of 3000 – 4500 MW. These were old very conservative numbers taken from an Iowa energy site. Today's Iowa's average base load requirements from coal and sources besides wind, are very likely 6500-7000 MW or about 60,000,000 MWh per year.

These energy numbers for Iowa's grid are real and are nowhere to be seen with wind energy reporting. It sure appears that Iowa is using fraudulent wind energy estimates to collect an abundance of Production Tax Credits along with selling regular energy created in fossil fuel plants, as being green.

Iowa's true wind energy value to customers is likely being deliberately overstated between four and five times. The same holds true for every bit of the [EIA](#) wind energy data posted for CA and all other states as well.

In conclusion, this is truly a horrendous industry and the approval of Hatchet Ridge was a monumental mistake by Shasta County Supervisors. For the good of this county, let's hope that Hatchet Ridge is the last wind project to ever be approved in Shasta County.

Jim Wiegand - Lakehead CA

*

Additional supporting images shown below:

Iowa Electric Profile (2020 - Including Non-Utility Generation)

ELECTRIC GENERATION IN IOWA BY PRIMARY ENERGY SOURCE	2020 NAMEPLATE CAPACITY (MW)¹	PERCENT OF NAMEPLATE CAPACITY	2020 GENERATION (MWH)²	PERCENT OF GENERATION
Coal	5,754.7	25.61%	14,146,835	23.72%
Wind	11,406.9	50.76%	34,182,302	57.32%
Nuclear	0.0	0.0%	2,904,863	4.87%
Natural Gas	4,215.0	18.76%	7,036,824	11.80%
Hydro	129.2	0.58%	1,025,215	1.72%
Other & Other Renewables	22.0	0.10%	207,440	0.35%
Petroleum	924.2	4.11%	111,111	0.19%
Solar	18.4	0.08%	22,082	0.04%
Total	22,470.4	100.00%³	59,636,672	100.00%³

1	Table 4. Electric power industry capacity by primary energy source, 1990 through 2020						
2	Iowa						
3	megawatts						
4		Year 2020	Year 2019	Year 2018	Year 2017	Year 2016	Year 2015
39	Total electric industry	21,333.2	20,409.5	18,842.2	17,670.8	17,045.5	16,8
40	Battery	1.4	1.1	1.1	-	-	-
41	Coal	5,284.0	5,343.8	5,371.7	5,497.9	5,548.8	6,2
42	Hydroelectric	150.4	146.4	146.4	146.4	144.9	1
43	Natural gas	3,694.7	3,647.1	3,580.7	3,571.1	2,931.8	2,6
44	Natural gas - CC	1,816.2	1,829.0	1,779.8	1,772.6	1,121.1	1.1
45	Natural gas - GT	1,228.4	1,226.8	1,260.4	1,265.7	1,140.3	1.1
46	Natural gas - IC	106.5	96.4	97.2	91.4	92.4	-
47	Natural gas - ST	543.6	494.9	443.3	441.4	578.0	3
48	Nuclear	-	601.4	601.4	601.4	601.4	6
49	Other	-	-	-	-	-	-
50	Other biomass	20.6	20.6	21.4	21.4	21.4	-
51	Petroleum	841.6	851.7	854.0	852.7	1,022.9	1,0
52	Petroleum - GT	204.1	205.3	201.5	202.1	385.9	4
53	Petroleum - IC	605.5	614.4	613.0	618.6	605.0	6
54	Petroleum - ST	32.0	32.0	39.5	32.0	32.0	-
55	Solar	18.0	13.4	8.9	7.7	2.6	-
56	Solar- PV	18.0	13.4	8.9	7.7	2.6	-
57	Wind	11,322.6	9,784.0	8,256.6	6,972.2	6,771.7	6,1
Other biomass includes agricultural byproducts, landfill gas, biogenic municipal solid waste, other biomass (solid, liquid and gas) and sludge w							
Other gases includes blast furnace gas, and other manufactured and waste gases derived from fossil fuels.							
Other includes non-biogenic municipal solid waste, batteries, chemicals, hydrogen, pitch, purchased steam, sulfur, tire-derived fuels, waste							
58	Source: U.S. Energy Information Administration, Form EIA-860, Annual Electric Generator Report.						
59							
<div>►1. Summary2A. Plants-Capacity2B. Plants-Generation3 Retailers4. Capacity5</div>							

Fake numbers

Table 5. Electric power industry generation by primary energy source, 1990 through 2020

Iowa					
megawatthours					
Total electric industry	59,636,671	61,673,544	63,380,569	57,909,568	54,395,000
Battery	-60	-94	0	.	.
Coal	14,146,835	22,159,203	28,552,999	25,358,230	25,155,000
Hydroelectric	1,025,215	796,268	924,861	1,033,940	910,000
Natural gas	7,036,824	7,684,253	7,340,070	4,567,447	2,960,000
..Natural gas - CC	5,971,857	6,892,269	6,409,135	3,746,433	2,410,000
..Natural gas - GT	479,512	386,174	518,450	343,837	190,000
..Natural gas - IC	2,769	10,192	3,200	12,169	.
..Natural gas - ST	582,687	395,617	409,286	465,008	340,000
Nuclear	2,904,863	5,235,716	4,895,399	5,213,509	4,700,000
Other	0	0	0	2,382	1,000
Other biomass	199,395	203,122	209,177	207,859	250,000
Petroleum	111,111	238,192	110,565	146,719	210,000
..Petroleum - GT	671	101,527	3,049	25,607	40,000
..Petroleum - IC	7,744	9,653	7,610	24,555	10,000
..Petroleum - OTH	24	67	300	0	.
..Petroleum - ST	102,672	126,745	99,606	96,558	90,000
Solar	22,082	15,436	11,456	4,838	.
..Solar- PV	22,082	15,436	11,456	4,838	.
Wind	34,182,302	25,328,971	21,334,057	21,372,752	20,000,000
Wood	8,105	12,478	1,986	1,890	.

Other biomass includes agricultural byproducts, landfill gas, biogenic municipal solid waste, other biomass (solid, liquid and gas) and Other gases includes blast furnace gas, and other manufactured and waste gases derived from fossil fuels.


Other includes non-biogenic municipal solid waste, batteries, chemicals, hydrogen, pitch, purchased steam, sulfur, tire-derived fuels

Note: Totals may not equal sum of components because of independent rounding.

Source: U.S. Energy Information Administration, Form EIA-923, Power Plant Operations Report and predecessor forms.



From: Jim Fawcett <jcf9393@yahoo.com>
To: Shasta County BOS
Sent: 4/12/2022 3:56:20 PM
Subject: Wind Farms

 **EXTERNAL SENDER:** Do not follow links or open attachments unless you recognize the sender and know the content is safe.

I would like to endorse the development of wind farms in Shasta County. Whatever objections one may have to wind farms they are far less than objections to fossil fuels. We must employ ALL the available technologies NOW in order to decrease our use of fossil fuels. Time is running out. Perhaps someone will soon develop a miraculous method of producing electricity. We can then look at removing the wind farms, dams, solar farms, or other things some find objectionable. We must first survive. James Fawcett, resident district 3.

April 13, 2022

Shasta County Planning Commission
1855 Placer St Suite 103,
Redding, CA 96001

*Re: Proposed Amendments to Shasta County Zoning Code to Prohibit Large Wind
Energy Systems*

Dear Chair and Members of the Planning Commission:

This firm represents ConnectGen LLC. ConnectGen LLC is a leading developer of renewable energy with projects throughout the United States. I am writing about the proposed amendments to Shasta County's zoning code (Zone Amendment 22-0001) which, if approved, would prohibit "private wind energy production systems not classified as small wind energy systems" (also referred to as "large wind energy systems") in almost all areas of unincorporated Shasta County. The Planning Commission is scheduled to hear this item at its April 14, 2022 regularly scheduled meeting.

Poor Public Policy. There are compelling policy reasons why Shasta County should not adopt the proposed zoning code amendments:

- Large wind energy systems can safely and compatibly be developed in Shasta County, including in areas of high fire risk.
- Shasta County 's professional planning staff recommended approval of both the Hatchett Ridge and Fountain Wind Project because they determined, based on substantial and highly credible evidence that, properly designed and mitigated, large wind energy systems are compatible with high fire risk lands and are not detrimental to health, safety, peace, morals, comfort and general welfare of persons residing or working in the neighborhood or be detrimental or injurious to property or improvements in the neighborhood or to the general welfare of the County.
- No wildfires have resulted from the construction and operation of the Hatchett Ridge project, which has been operational for over 10 years. There is simply no basis to conclude that other wind projects will cause wildfires.
- Small wind energy systems do not supply electricity to the retail market and do appreciably reduce carbon emissions on regional or statewide scale
- Large wind energy systems are a critical part of how California plans to address climate change, which will help reduce wildfire risk.

- Electricity produced from large wind energy systems displaces carbon emissions from fossil fuel power plants.
- Large wind energy systems create jobs and substantial tax benefits for Shasta County.
- Under the existing zoning code, the County can already carefully consider individual large wind energy systems on their merits through the conditional use permit process.

Violation of CEQA. In addition to these policy reasons, there are legal reasons the County should not proceed with the proposed amendments. Based on the current record, adoption of these zoning changes without environmental review would violate the California Environmental Quality Act (CEQA), Public Resources Code section 21100 et seq. Unless a project is exempt, CEQA requires an agency to conduct an environmental review to determine whether a project may have a significant effect on the environment. *Muzzy Ranch Co. v. Solano County Airport Land Use Commission* (2007) 41 Cal. App. 4th 372 at 380-381.) A "[s]ignificant effect on the environment" means a substantial, or potentially substantial, *adverse change in the environment*." Public Resources Code section 21068, italics added.) The Guidelines define "[s]ignificant effect on the environment" as "a substantial, or potentially substantial, *adverse change* in any of the physical conditions within the area affected by the project including land [and] . . . flora" (Guidelines, § 15382, italics added.)

Draft Resolution 2022-013 claims that Zone Amendment 22-0001 is exempt pursuant to CEQA Guidelines sections 15060(c)(2) since "it can be seen with certainty that this ordinance will not result in a direct or reasonably foreseeable indirect physical change in the environment." But this exemption -- known as the "common sense exemption" -- does not apply here for the reasons stated below. Before it can approve these amendments, the County is therefore required to prepare an environmental document in compliance with CEQA.¹

In its entirety, CEQA Guidelines section 15061, subdivision (b)(3) provides: "(b) A project is exempt from CEQA if: [¶] . . . [¶] (3) The activity is covered by the general rule that CEQA applies only to projects which have the potential for causing a significant effect on the environment. Where it can be seen with certainty that there is no possibility that the activity in question may have a significant effect on the environment, the activity is not subject to CEQA."

The common sense exemption can be relied on only if a factual evaluation of the agency's proposed activity reveals that it applies. *Davidon Homes vs City of San Jose* (1997) 54 Cal. App. 4th 106 at 114. The agency invoking the exemption has the burden of demonstrating that it applies. *Id.* at p. 116. Further, it applies only when it is *undisputed* that a project will enhance rather than degrade existing environmental conditions. *CREED-21 v. City of San Diego* (215) 234 Cal. App. 4th 488, 512.

As recognized by the leading treatise on CEQA (see Kostka & Zischke, *Practice under the Environmental Quality Act*, CEB, section 5.112) certain projects ostensibly adopted to protect or

¹ As a threshold matter, the proposed amendment of the zoning ordinance clearly constitutes a "project" subject to CEQA. The staff report makes no argument that the amendment is not a project and immediately addresses the second tier of analysis—whether the project is exempt from CEQA under the commonsense exemption.

improve the environment can have collateral effects on the environment that preclude application of the exemption. As a result, agencies cannot simply assume that measures intended to protect the environment are entirely benign. For example, the court in *Dunn-Edwards Corp. v. Bay Area Air Quality Management District* (1992) 9 Cal. App. 4th 644 overturned amendments to air district regulations designed to reduce the amount of volatile organic carbons (VOCs) in paint and other architectural coatings for failure to comply with CEQA. Because there was evidence that the new regulations would require lower quality products that would result in a net increase in VOC emissions, an exemption under 14 Cal Code Regs §15061(b)(3) was held to be improper. See also *Muzzy Ranch Co. v. Solano County Airport Land Use Commission*, supra, 41 Cal. App. 4th 372 at 380-381 (displacement of development pressure can be environmental impact, but common sense exemption applied to airport land use plan but chiefly because it kept preexisting designations in place); *Wildlife Alive v. Chickering* (1976) 18 Cal. 3d 190 (Fish and Game Commission action setting fishing and hunting seasons has potential for both beneficial and adverse effects on survival of certain species); *Building Code Action v. Energy Resources Coserv. & Dev. Comm'n* (1980) 102 CA 3d 577 (adoption of energy conservation regulations establishing double-glazing standards for new residential construction could have significant impact on air quality as result of increased glass production).

Here, the County's zoning code currently allows wind energy generation projects as a "public utility" in any zoning district with a conditional use permit. As in the *Dunn-Edwards* case and in stark contrast to the *Muzzy Ranch* case (which merely maintained existing zoning regulations and did not change them), the amendments here propose a prohibition on large scale wind energy in the vast majority of the unincorporated area of Shasta County where they are currently conditionally allowed. Draft Resolution 2022-013 defends the application of the common sense exemption on the ground that the prohibition would potentially educe wildfire risk and reduce biological and other impacts *in the County*. However, the Resolution fails to address or acknowledge the indirect but very real adverse regional and statewide impacts of precluding the potential development of approximately 2012 MW of emissions-free wind energy in Shasta County.² Precluding the development of these wind energy projects could result in a lost opportunity to displace 2,143,241 metric tons of CO₂ per year, the equivalent of removing 461,802 gasoline powered passenger vehicles driven for one year³ from the road as well as thwart the California Public Utility Commission's Adopted Plan for procurement of approximately 3500 MW of on-shore wind by 2025. This prohibition would also thwart the State of California's goals contained in SB 100 requiring renewable energy and zero-carbon resources to supply 100% of electric retail sales to end use customers by 2045. It would also undermine the state's goal of reducing GHG emissions by 40% by 2030 compared to 1990 levels under AB 32. A prohibition on all large wind energy systems in Shasta County would also undermine the Shasta County Air Quality Management District's Regional Climate Action Plan

² This figure is derived from the number of acres of private land in the unincorporated part of the County where wind speed would be commercial (above 6 m/s) based on California Energy Commission and National Renewal Energy Laboratories wind maps, then assuming 80 acres per MW.

³ <https://www.epa.gov/energy/greenhouse-gas-equivalencies-calculator>

which reduce community GHG emissions to 49% below 2008 levels by 2035 (i.e. 291,340 MT CO₂e/yr.) This loss of clean electricity from large wind energy systems that could be produced in Shasta County could lead to higher levels of carbon emissions for a longer period, a diminished capacity to slow global warming and potentially higher risk of wildfires. Furthermore, the conclusion that the prohibition would potentially reduce wildfire risk ignores the record from the Fountain Wind conditional use permit which demonstrated that project actually enhanced the fire safety in the area of the project. The record also demonstrated that any impacts to wildlife would be mitigated under CEQA and applicable state and federal laws.

Given these potential results, it is abundantly clear that it *cannot* be seen *with certainty* that there is *no possibility* that the proposed amendments to the zoning code may have a significant effect on the environment. To the contrary, the proposed amendments *quite possibly* may have an adverse impact on the state's ability to address climate change, fight wildfires and reduce carbon emissions, all of which could result in significant adverse impacts on the environment. As such, the common sense exemption does not apply and the County must prepare an environmental analysis in compliance with CEQA before approving such amendments.

Inconsistent with the General Plan. Approval of these amendments would also be in violation of state planning law requiring that the zoning code be consistent with the General Plan. Shasta County's General Plan recognizes that renewable energy, including wind energy, are important features in the County's energy future. An outright prohibition on large wind energy systems would be inconsistent with the stated importance of renewable energy, including wind energy in the County's General Plan:

"Renewable energy resources, coupled with strategies to encourage conservation, are important features in the Shasta County region's energy future. In 2002, the Governor signed the Renewable Portfolio Standard (RPS), SB 1078. This standard requires an annual increase in renewable generation equivalent to at least 1 percent of electricity sales, with an aggregate goal of 20 percent by 2017. Currently renewable generation accounts for 11 percent of retail sales. California's Energy Action Plan has targeted a goal of 20 percent by 2010. 21 Achieving the RPS could displace 20,000 tons of nitrogen oxide (Nox) emissions from gas and coal-fired generation in the Western states over the 2004-2013 time frame. Also, the use of renewable resources can reduce carbon dioxide and greenhouse gas emissions associated with global climate change. Generation of electricity from renewable energy rather than by fossil fuels can reduce CO₂ and other green-house gas emissions associated with climate change. Model simulations in one instance indicate that achieving the RPS by 2010 could reduce annual CO₂ emissions by about 62 million tons by 2013. This is equivalent to estimated annual CO₂ emissions from more than 6 million automobiles. Geothermal energy provides the largest portion of renewable electricity in California where such generation is by systems 30 MW or smaller. Renewable energy (excluding small and large hydropower) provided four percent for the region's energy production in the Western Electricity Coordinating Council (WECC) states. If renewable energy could be used to replace the estimated growth in gas-fired generation from 2004- 2017, the total amount of

renewable energy by 2017 would reach about 38 percent. This would make renewable energy the largest source of electricity generation in California. Overall, existing renewable energy facilities utilize a small proportion of the technical potential for renewable energy in California.

Important renewable energy sources in Shasta County include solar, hydroelectricity, biomass, and cogeneration. There is also potential for development of wind, geothermal, and waste-to-energy as alternative sources of energy production. Technology improvements associated with renewable energy development will be a key to its rate of success. Renewable energy sources can be most effectively applied for space heating and cooling and for electrical generation. For the oil dependent transportation sector, renewable energy solutions involve developing marketable alternative fuel types as the cost of oil rises. Collectively, renewable energy offers a diverse and virtually inexhaustible resource, opportunities for developing new base industries, and all at substantially less environmental cost.

Conclusion: The proposal to prohibit all large wind energy systems in almost all of Shasta County based on the common sense exemption would violate CEQA, be poor public policy, and violate state planning and zoning laws requiring consistency with the General Plan. The County already has the ability to use its discretion to allow or disallow specific projects under the conditional use process. For all of the above reasons, we urge the Planning Commission to reject the proposed amendments.

Very truly yours,

A handwritten signature in blue ink that reads "Anne E. Mudge". The signature is fluid and cursive, with the first name "Anne" and last name "Mudge" being clearly legible, and "E." as a middle initial.

Anne E. Mudge



North State Climate Action

Dear Commissioners:

My organization, North State Climate Action (NSCA) is a group of volunteers in California's far North State region. Our mission is to **promote solutions addressing the climate crisis through education, collaboration, and action in our communities.** To avoid increasingly dire effects of climate change, including drought, deadly heat waves and worsening fires, we must cease reliance on fossil fuels as quickly as possible with carbon free energy such as wind power. Wind power has the advantages of limiting climate change, improving air quality, and also significantly reducing water demands that fossil fuel power creates. Additionally, wind power technology is still evolving, and future projects may be able to provide environmental mitigations not available today. Please consider the following comments as you evaluate Zone Amendment 22-0001. Ordinance changes proposed in the amendment prohibit all "large" wind power projects in the unincorporated county regardless of specific project details. Don't propose enactment of a blanket prohibition on a viable, clean and renewable power source in Shasta County.

Wild fire potential may be the most contentious issue for siting wind farms. We have arranged our comments to address fire concerns first. Then we discuss each of the impacts that were determined to be significant but unavoidable in the Fountain Wind project, as those issues will be similar in any future wind power proposal. We then discuss the general plan objectives addressed by staff in their report.

Wildfire

The Fountain Wind EIR deemed fire risk less than significant with proposed mitigations. Similar or additional mitigation would be implemented for any new proposed project. Enhanced fire suppression techniques during construction, operation, and decommissioning could be considered for future proposals, such as:

- Greater fuel free buffer zones surrounding roads and towers;
- Enhanced maintenance for wind tower mechanical, electrical and fire suppression equipment;
- Enhanced maintenance of transmission lines including those off site;
- Burying transmission lines;
- Curtailment of turbines during extreme fire conditions;
- Additional removal of flammable debris along off-site roadsides. This was proposed in the Fountain Wind project, but the scope was apparently not considered adequate by the Supervisors;
- Changes in construction materials. In the Hatchet Mountain project, turbine nacelles were constructed of steel, instead of fiber glass, providing enhanced fire protection.

Also note that the access roads and site work in any wind farm project will provide fire breaks, aiding fire suppression, as noted in the Fountain Wind EIR and by Cal Fire.

The wind turbines at Hatchet Mountain have never experienced a fire, and they have been in operation for 12 years. It's estimated by a wind trade organization that a wind tower has only a 1/2000 to 1/15,000 chance of a fire per year. This review estimated chances of fire to be even lower. These estimates include data from many older towers without cutting edge technology such as automatic nacelle fire suppression.

A major concern expressed by the public, commissioners, and supervisors regarding the Fountain Wind project was the difficulty of aerial fire fighting near the turbines, and that's a valid issue. As indicated by Bret Gouvea with CAL FIRE at the October 26 Board of Supervisors meeting, although the difficulty of fire suppression adjacent to a wind tower is an important consideration, these types of decisions are part of the hazards considered in any fire fighting plan. Mr. Gouvea also noted that all firefighting situations are unique. CAL FIRE could have spoken against the Fountain Wind project as proposed, but did not do so. Additionally, the specific layout of wind towers in a project is important in any analysis of aerial firefighting potential. For example, a linear layout of towers similar to the Hatchet Mountain project would likely simplify aerial fire fighting.

With all the mitigation discussed above, the risk of destructive fires is substantially reduced. Not eliminated, which is impossible, but substantially reduced. In accordance with the EIR for Fountain Wind, fire impacts were reduced to less than significant with mitigation (as

noted, mitigation could be enhanced in future projects) and planning staff concurred with that analysis.

Evaluation of wind project benefits should take into account that the potential loss of life from wind power during its construction and operational life is significantly less than from fossil fuel power. [One source](#) indicates that the number of deaths from fossil fuel power generation (due to fuel extraction, transport, refining, construction, distribution and operation) is almost 150 times that of wind power. In accordance with that information, for a project similar to Fountain Wind there is a 50% chance of one death over a 40 year operation period, versus the potential of 69 deaths from fossil fuel power (primarily due to air pollution). Potential deaths from wild fires sparked by wind power would increase the chance of wind farm deaths to a degree, but it's very unlikely to be comparable to fossil fuel power mortality. It's clear that fossil fuel power kills.

Most of the County is in a high or very high potential fire area according to Figure FS-1 of the General Plan (currently outdated according to staff). All construction activities, well as human occupation in those areas, have the potential to ignite fires. That, however, has not led to considering a prohibition of construction of homes and other buildings anywhere in Shasta County. That risk is accepted. If that type of building can continue, why not wind farms with appropriate mitigations? Additionally, since figure FS-1 of the general plan is not current, and the county is working on updating it, these ordinance changes are premature. Also note that Figure FS-1, although outdated, contains limited areas not considered either high or very high fire risk.

Biological Resources.

There is no doubt that wind towers cause bird and bat mortality. Wind projects should be sited properly and be required to minimize bird and other wildlife losses. Impacts to biological resources were thoroughly discussed in the Fountain Wind EIR and any proposed wind farm project would require the same process. Note that climate change presents a much greater potential for individual and species loss than wind farms. [According to the United Nations](#) climate change may contribute to the extinction of 20–30 percent of all species. [According to the Audubon Society](#), "If climate change continues apace, hundreds of North American bird species' ranges will shrink by at least half by 2100."

Both the [Audubon Society](#) and the [American Bird Conservancy](#) support properly sited wind power. State and Federal departments of Fish and Wildlife made no comments on the final Fountain Wind EIR. Future wind projects could be further constrained to provide additional bird and bat protection, as well as other wildlife. Some promising methods for additional bird fatality reduction include [painting of towers, or even painting one blade of the turbine black](#), and [use of radar](#) to detect approaching flocks so turbines can be temporarily shut down. One

objection raised against Fountain Wind was the adequacy the post-construction bird mortality monitoring. That objection could be overcome by expanding such monitoring beyond the 3 years proposed in that project, perhaps for the life of a project. Studies have also been performed using dogs to better spot birds killed in tower collisions. Compensatory mitigation is another option to preserve bird populations. This mitigation could consist of earmarking land not on the wind farm proper as increased habitat for species of concern, or a project to minimize bird mortality from other causes, such as power transmission that is not a part of the proposed project. Lastly, Fountain Wind proposed that individual turbines could be removed if they were shown to cause unacceptable bird mortality. Such a condition could, and should, be included in any future wind farm proposal.

The issue of wildlife protection in wind projects also must be compared to wildlife impacts from fossil fuel power generation that wind can replace. One study estimated that fossil fuel power resulted in the loss of 10-15 times as many birds as wind power, on a per kilowatt-hour basis. This mortality data included older wind farms, which are more likely to cause bird kill than newer towers.

Aesthetics

Aesthetics tends to be a bit subjective, so we are not going into this issue in detail. It should be noted, however, that wild fires exacerbated by climate change will continue to severely impact the beautiful view sheds of the county.

Cultural and Tribal Resources

Similar to other comments above, it's not possible to discuss this issue in detail until there is a project to analyze. Any project in Shasta County could impinge on Native American concerns and cultural resources, but that is not a given, and any necessary mitigation must be site specific.

Additional mitigations regarding this issue were proposed for Fountain Wind after the Planning Commission hearing, including providing access to areas the tribes considered significant to their cultural and religious practices. That same approach, or others, could be investigated if relevant to a new project.

Air Pollution

The EIR found that impacts from PM10 emissions were significant and unavoidable, but recommended that the Planning commission adopt a statement of overriding considerations to allow the project. Future proposed wind farms would likely have similar issues, but the scope of those issues would depend on the size, location, and other specifics of the project.

Compliance with General Plan Objectives as noted in the staff report.

Following are the General Plan Objectives that were discussed in the staff report and thoughts on how those objectives do not necessarily preclude the construction of wind farms in the county.

Objective FS-1 Protect development from wild land and non-wild land fires by requiring new development projects to incorporate effective site and building design measures commensurate with level of potential risk presented by such a hazard and by discouraging and/or preventing development from locating in high risk fire hazard areas.

The county can fulfill this objective by requiring appropriate mitigations specific to each wind project. It's not possible to adequately analyze a project for fire danger, or even whether it is in a very high fire danger zone, until there is a project to consider and fire hazard zones have been updated by the county. Note the objective does not propose a blanket ban on all projects in high fire danger zones in the county, and the benefits of wind power should be considered in fulfilling this objective. And, as noted above, there is no current consideration of preventing development except for wind farms.

Objective SH-1 Protection of the natural scenery along the official scenic highways of Shasta County from new development which would diminish the aesthetic value of the scenic corridor.

The entire county is not a scenic highway. There are many potential wind project areas adequately distant from the County's designated scenic highways to eliminate wind towers from their view shed. Prohibiting wind farms in the entire County due to aesthetic considerations of scenic highways is overkill. The commission may consider prohibiting wind farms within a prescribed distance of scenic highways, but that determination should again be evaluated taking into account the benefits of wind power. As also noted above, if the risk of wildfires due to relentless temperature increases from climate change continues, the scenic resources along these highways are likely to **burn, eliminating a major portion of their scenic value.**

Objective CO-3 To guide development in a pattern that will respect the natural resource values of County lands and their contributions to the County's economic base.

Harvesting of the wind resources of the county, which will contribute substantially to the county's economy, while helping to reduce green house gases and minimize climate change exacerbated wildfires (which degrade the aesthetic resources of the county with acrid smoke and burned timberland), seems to be a good fit for this objective. The Fountain wind project

has economically benefited the county, as noted by former supervisor Moty at the 26 October 2021 Board of Supervisors meeting, and future wind projects could bring similar benefits.

Objective CO-4 To guide development in a pattern that will minimize land use conflicts between adjacent land users.

We can certainly see that placing wind towers at a location where they would dominate the landscape of adjacent property owners could create a conflict. But these potential conflicts must be weighed along with the potential benefits of a wind farm to everyone in the county.

In conclusion, power generated with wind energy benefits everyone in the county, including indigenous populations, due to its mitigation of climate change's deleterious effects, reduction of air pollution and decreased water use. Even if a proposed wind project has significant impacts, impacts and benefits should be considered on a site specific basis to assess whether its benefits override those impacts.

Please do not recommend a blanket prohibition on wind farms in the county,.

Thank you for the work you do and the opportunity to comment on these proposed ordinance changes.

Ron Dykstra



**Shasta
Environmental
Alliance**

P.O. Box 993777 • Redding, CA 96099 • ecoshasta.org

April 13, 2022

Paul Hellman, Director of Resource Management
Shasta County Planning Commissioners
1855 Placer Street
Redding, CA 96001

RE: REGULATION OF WIND ENERGY SYSTEMS

Dear Mr. Hellman and Shasta County Planning Commissioners

This letter is in reference to the proposed ordinance regarding the regulation of wind energy systems and the draft ordinance that you will be considering on your meeting of April 12, 2022.

First, we want to commend the Planning Commission for your thoughtful consideration and eventual denial of the Fountain Wind Project despite considerable support from construction, real estate and business interests in Shasta County and beyond. Due to fire danger in steep and forested terrain, wildlife habitat issues and the concerns of the Pit River Tribe, we too did not support the project.

We do have serious concerns about the draft ordinance you have before you for the following reasons:

LARGE WIND ENERGY PROJECTS

1. It is too broad, eliminating all of Shasta County from any large scale wind projects because of fire hazards ignores the many other sources of wildfires in Shasta County such as automobiles, both on and off highway; outdoor shooting ranges (BLM land near Keswick Dam has had many), gas powered equipment such as lawnmowers (Jones Fire 1999), and perhaps foremost are PG&E powerlines: arson is another common source of wildfires in Shasta County, including the recent Fawn Fire. The number of wildfires caused by wind farms is extremely small and much less than the threat of fire from the above stated reasons.
2. If wind farms are placed in terrain that is not steep nor heavily forested, aerial firefighting planes could still make fire drops. It would also be much easier to make a fire break.

3. These wind farm projects could be an important source of energy, jobs and taxable income for Shasta County and California.

SMALL SCALE WIND PROJECTS

This section is so limiting that it seems to have been written with the sole purpose of even preventing small scale wind energy from being developed in Shasta County, as if someone has a philosophical opposition to wind energy.

The primary problem with this section of the ordinance is that the height limit is 80 feet. This is way to small to catch higher winds that would make a wind turbine profitable. The Walmart Distribution Center south of Red Bluff near Gerber has a wind turbine that is 265 feet tall and provides 15 to 17% of the center's electricity needs. It has been in operation over 10 years and has not caused any fires to my knowledge. I have driven by this turbine many times and it does not detract from the aesthetics of the area.

Monterey County has allowed wind turbines in the Salinas Valley and a number of them have gone up in the area around Gonzales and Greenfield near Highway 101. The towers are up to 300 feet tall and are placed at the end of row crops in the area. While I enjoy the seeing the Coast Range as I drive up that highway, the wind turbines do not detract from the aesthetics. Plus, they give farming interests extra income from leasing out their land as they do to farmers across the United States. By passing this ordinance you could be denying farmers in the Fall River area the opportunity to supplement their farming income in the future.

With the new federal and state requirements mandating increased renewable energy sources, you would be limiting Shasta County from achieving many of these goals. While I'm sure the Shasta County Attorney's office has reviewed this ordinance for its legality, it seems like this is something that could motivate certain legislators to pass a statewide law banning extremely constrictive ordinances such as this one.

We urge you to reconsider this ordinance, it does not seem to have been thoroughly thought out and needs to be changed as noted above.

Sincerely,



David Ledger, President


From: [SCPlanning](#)
To: [Paul Hellman](#)
Subject: FW: Zone Amendment 22-0001 Comment
Date: Wednesday, April 13, 2022 8:01:48 AM
Attachments: [image001.png](#)

Tracie Huff

Administrative Secretary I
Planning Division
Shasta County Resource Management
1855 Placer Street STE 103
Redding CA 96001
(530) 225-5532 Phone
(530) 245-6468 Fax
resourcemanagement@co.shasta.ca.us



From: Doug Mandel [REDACTED]
Sent: April 12, 2022 9:08 PM
To: SCPlanning <scplanning@co.shasta.ca.us>
Subject: Zone Amendment 22-0001 Comment

 **EXTERNAL SENDER:** Do not follow links or open attachments unless you recognize the sender and know the content is safe.

Dear Commissioners:

Power generated with wind energy benefits everyone in the county due to its mitigation of climate change's deleterious effects, reduction of air pollution and decreased water use. Even if a proposed wind project has significant impacts, impacts and benefits should be considered on a site-specific basis to assess whether its benefits override those impacts.

Please do not recommend a blanket prohibition on wind farms in the county.

Sincerely,

Doug Mandel

Redding, CA 96001

From: [SCPlanning](#)
To: [Paul Hellman](#)
Subject: FW: Zone Amendment 22-0001
Date: Thursday, April 14, 2022 7:54:44 AM

Tracie Huff
Administrative Secretary I
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(530) 245-6468 Fax
resourcemanagement@co.shasta.ca.us

-----Original Message-----

From: MaryAnn M [REDACTED]
Sent: April 13, 2022 5:13 PM
To: SCPlanning <scplanning@co.shasta.ca.us>
Subject: Zone Amendment 22-0001

EXTERNAL SENDER: Do not follow links or open attachments unless you recognize the sender and know the content is safe.

Shasta County Planning Commissioners: As a citizen of Shasta County since 2005, I am concerned that the proposed Zone Amendment 22-0001 regarding regulation of Wind Energy Systems County-Wide is overly broad and restrictive. There are large areas in Shasta County that are not in a high fire hazard zone. In these areas the most crucial objections to the Fountain Wind Project would have been moot. Also, mitigations for the impacts of wind farms are improving. We do need to reduce our reliance on fossil fuels, that have many negative impacts on the environment and our climate. Please do not commit the error of government over-reach in a County that is predominantly anti-Government already. Thank you.

Sincerely,
MaryAnn McCrary
5136 Bidwell Road
Redding, CA. 96001



April 14, 2022

Shasta County Planning Commission
1855 Placer Street, Suite 103
Redding, CA 96001

Via electronic email

Subject: Proposed Prohibition of Large Wind Energy Systems, Zone Amendment 22-0001)

Dear Chair and Members,

Pattern Energy writes with significant concerns and opposition the proposed amendments to Shasta County's Zoning Code (Zone Amendment 22-0001), prohibiting wind energy systems in unincorporated Shasta County, where they are currently conditionally allowed.

As the owner of Hatchet Ridge Wind Project, Pattern Energy works to bring benefits to Shasta County. Hatchet Ridge Wind expects to generate more than \$30 million over the first 20 years of operations in tax payments benefiting the local region and schools.

The Hatchet Ridge Wind Community Benefits Program invests \$5 million in the local community through the Shasta County General Fund, the Burney-Fall River Education Foundation, and the Burney Regional Community Fund administered by the Community Foundation of the North State.

We want to continue to serve as stewards of the land as we work to provide reliable, low-cost power to Northern Californians, and we pledge to work with you on any future modifications to the project, including a possible repowering.

We understand Shasta County's independence and appreciation for the land and resources it provides to your local communities and hope to work with you in partnership toward a more reliable and affordable power grid.

Sincerely,

Danielle Osborn Mills
Senior Manager, External Affairs
Pattern Energy



California Wind Energy Association

April 14, 2022

Shasta County Planning Commission
1855 Placer St Suite 103
Redding, CA 96001

Via email

Re: Proposed Prohibition of Large Wind Energy Systems

Dear Chair and Members of the Planning Commission:

The California Wind Energy Association (CalWEA)¹ writes with alarm regarding the proposed amendments to Shasta County's zoning code (Zone Amendment 22-0001) that are before you today. If approved, these amendments would prohibit large wind energy systems in almost all areas of unincorporated Shasta County where they are currently conditionally allowed.

CalWEA urges the Planning Commission to reject the proposed amendments outright. At a minimum, the County must prepare an environmental analysis in compliance with the California Environmental Quality Act (CEQA) before considering such amendments.

Wind energy will play a critical role in meeting California's climate change mitigation goals aimed at the root cause of the drought and wildfires that are wreaking havoc in California. A study performed for the California Energy Commission looking at means of achieving California's energy-decarbonization goal² shows that dramatic growth in wind energy will be required to achieve that goal most affordably while ensuring the reliability of the grid.³ The California Public Utilities Commission's resource plan includes over 3,500 megawatts

¹ CalWEA is a 20-year-old trade association representing wind energy and related companies focused on the California market, primarily including owners, operators and developers of wind energy projects located in California and in waters off the California coast.

² SB 100, signed into law in September 2018, establishes as state policy that zero-carbon resources are to supply 100% of California retail sales by December 31, 2045.

³ California Energy Commission, "Deep Decarbonization in a High Renewables Future," at Figure 14. CEC-500-2018-012. June 2018. (Available at: <https://www.energy.ca.gov/2018publications/CEC-500-2018-012/CEC-500-2018-012.pdf>.) This study shows that, absent a large amount of wind energy from within or outside of the state to balance solar resources, decarbonization will come at an added cost of nearly \$20 billion per year. Also see

(MW) of additional wind energy delivered to the Cal-ISO grid by 2025,⁴ a 60 percent increase in the amount of wind energy generation currently operating in California. Realizing the state's clean energy goals, of which in-state wind energy is a critical component, will require counties to recognize, in their planning and permitting decisions, that wind energy projects must be part of the solution to the most pressing environmental problem of our time.

Shasta County's professional planning staff have previously found that two properly designed large wind energy projects are compatible with high-fire-risk lands and are not detrimental to health, safety, and general welfare of neighboring persons. The Hatchett Ridge wind project has been safely operating for over 10 years. At the same time, wind energy projects bring important economic benefits to local communities, including jobs and tax base.

For these reasons, CalWEA urges the Commission to reject the proposed amendments. At a minimum, as explained in a letter submitted to the Commission on this matter by Cox Castle & Nicholson LLP (dated April 13, 2022), the County must prepare environmental review documents in compliance with CEQA before considering this proposal. The collateral impacts on the environment from the proposed amendments could include failure to achieve California's climate change mitigation plans.

Sincerely,



Nancy Rader
Executive Director

⁴ California Public Utilities Commission Decision 22-02-004 at Table 5 (February 10, 2022).

From: [SCPlanning](#)
To: [Paul Hellman](#)
Subject: FW: Wind Farms
Date: Thursday, April 14, 2022 11:51:52 AM
Attachments: [image001.png](#)

Tracie Huff

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resourcemanagement@co.shasta.ca.us



From: Warren Swanson [REDACTED]
Sent: April 14, 2022 10:19 AM
To: SCPlanning <scplanning@co.shasta.ca.us>
Subject: Wind Farms

⚠ EXTERNAL SENDER: Do not follow links or open attachments unless you recognize the sender and know the content is safe.

Planning Commissioners,

I'd like to make a comment on the proposal to ban all windmills from Shasta County. This is a deeply flawed and regressive idea. Shasta County has already received copious amounts of negative press around the country (New York Times, LA Times, SF Chronicle) about our fringe right wing groups. We don't need more articles painting us as a joke hick town (we are not).

Climate change is real and happening faster than predicted.
We need all hands on deck to slow it down and wind power is
one way to do that.

Please do the right thing and reject this ridiculous proposal.

Warren Swanson

3299 Woodbury Dr, Redding, CA 96002



From: [SCPlanning](#)
To: [Paul Hellman](#)
Subject: FW: Wind farms
Date: Tuesday, April 12, 2022 10:01:50 AM

Tracie Huff
Administrative Secretary I
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-----Original Message-----

From: Jeen Wopat [REDACTED]
Sent: April 12, 2022 9:36 AM
To: SCPlanning <scplanning@co.shasta.ca.us>
Subject: Wind farms

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April 12, 2022

Greetings Shasta County Planning Commissioners,

We request that you NOT support a blanket wind farm prohibition! We prefer that you evaluate each wind farm proposal based on its individual merits.

We appreciate that a blanket prohibition would be perhaps handy from a legislative perspective and administratively save some public dollars, but it would in no way serve our greater need of addressing clean energy challenges as we continue to find our way in an ever-changing climate threat.

Sincerely,
Michael and Linda Wopat
Shasta County residents, homeowners,
and voters

Sent from my iPhone

From: [REDACTED]
To: [SCPlanning](#)
Cc: [Paul Hellman](#); [Lio Salazar](#); [NSCA Steer Comm](#)
Subject: Zone Amendment 22-0001 Regulation of Wind Energy Systems County-Wide, Item R3, 14 April meeting
Date: Tuesday, April 12, 2022 7:08:27 PM

EXTERNAL SENDER: Do not follow links or open attachments unless you recognize the sender and know the content is safe.

Shasta County Planning Commissioners,

I believe that Shasta County should continue to consider future wind energy projects. I understand the concerns that have caused the County to dismiss recent wind power projects; however, each project should be evaluated separately. Appropriate mitigation measures should be required to reduce negative impacts. Wind power is a relatively clean energy that can help to reduce our dependence on fossil fuels.

It seems short-sighted to dismiss all large-scale wind energy projects in Shasta County. Please do not adopt Zone Amendment 22-0001.

Thank you for considering my concerns.

Carole Crowe
Redding, CA

Comments for Planning Commission regarding the prohibition of large wind energy systems within the unincorporated area of Shasta County

I think it's a fantastic idea to prohibit large wind energy systems in Shasta County because these countryside monsters do catch fire on a regular basis. This is a real ongoing threat for all of Shasta County. At some point, it is likely that one of the Hatchet Ridge wind turbines will catch fire, so I hope fire crews will be able to minimize the damage.

People across the world send me videos of turbine fires several times a year. This link shows a recent one.

<https://www.facebook.com/richard.major1/videos/10110297277215878>

But besides the wildfire dangers from wind turbines and infrastructure, there are other very good reasons to forever ban these systems in Shasta County. This industry and our government agencies lie about nearly everything with these energy systems and it's at the expense of the public. Below is new factual information I have put together for Shasta County that I want to be part of the official record.

The Interior Department's New Bald Eagle Take Numbers

America's green energy fraud has been going on for decades and as I have discovered, it never sleeps.

The Interior Department, with fraudulent research and has announced new imaginary bald eagle population estimates of about 317,000 bald eagles, New limits on the number of bald eagles that can be killed by industry each year have been increased to [15,832](#). The previous take limit, also created with fraudulent research, was set in 2016, at [4200 bald eagles](#) annually.

From [Federal Register](#)"Although some of the increase in the estimates of population size from 2009 to 2019 can be attributed to improvements in methods, the majority of the increase is likely due to population growth, estimated to be around 10 percent per year."

Improvements in "methods" really means, continue to ignore real world conditions dismiss the bald eagle habitat abandonment near wind farms like Hatchet Ridge and crank up the rigging for investors.

Not sure if the Interior Departments new eagle population estimates include Alaska or not but the population of [Alaska's bald eagles](#) is about 30,000. Alaska by leaps and bounds, has more bald eagles than any other state. Subtract that number from 316,708 and we are supposed to believe that on average, each of the lower 48 states has a population average of 5,971 bald eagles. In California the bald eagle population doesn't even come close and we might have 1/3 this number, but no more.

Here in Shasta County, CA, we easily have the highest density of bald eagles in the state and the total population including juveniles is about 150. Except for occasional migrants, many of California's 58 counties don't even have bald eagles. My Estimate is that there could be 1500 bald eagles living in CA.

As for Having 5791 bald eagles living in Ca, at some point it could be possible but the turbines killing them off in at Altamont and in the Delta region, would have to be destroyed. As for each of the lower 48 states having an average population of 5,971 bald eagles, it's not possible and in fact, the state of Alaska is the only state with this number of bald eagles.

The Interior Department has lied about the bald eagle population for 48 out of the 49 states with bald eagles. Keep in mind, they also produced a [fake study](#) that overestimated a golden eagle population in central CA by over 10 times.

Green Energy's Hidden Eagle Slaughter

Recently an American wind energy company pleaded guilty to federal criminal charges after at least 150 eagles were killed since 2012. The company has agreed to spend as much as \$27 million on efforts to prevent more deaths.

The company has agreed to spend up to 27 million to prevent more deaths. What good is this? Except for shutting down turbines, there is no way to prevent eagle deaths from wind energy. This industry and the USFWS are very aware of this because wind turbines have been annihilating eagles for decades.

The truth is, these 150 dead eagles are only the tip of the iceberg and very likely represent less than 1% of this ongoing carnage. Back in 1997, when California was the only state with wind turbines in eagle habitat, the Denver Eagle Repository, reported wind turbines being one of their primary sources for their yearly 800 eagle carcasses. When compared to 1997, America now has 80 times more installed wind energy than it did back then 1997. Today, based upon Repository records released up to 2014, the Denver Repository now receives over 3000 eagle carcasses a year.

But with this green energy expansion came a new era of wind turbines. These new turbines invading eagle habitats, were also far more deadly. Early turbines had blade tip speeds that were 110-120 mph while tip speeds for new turbines have speeds twice as fast.

Why doesn't the public know about any of this?

- 1) Wind energy mortality disclosures are not required, scientific research is not required and all wind industry mortality research being conducted, is being staged.
- 2) In 1997, the Clinton Administration created new laws so this ongoing slaughter could be conveniently considered, a business trade secret.
- 3) In 1997, The Freedom of information Act was changed to protect this industry.

4) In 1997, Interior Department personnel were silenced and their employment required non-disclosure agreements with very strict penalties.

5) In 1997, the Denver Eagle Repository was silenced and no longer allowed to discuss the origin of their eagle carcasses.

6) Leaseholders in partnership with wind energy developers are also required to sign very strict non-disclosure agreements. These leaseholders are never allowed to discuss species mortality taking place from the wind turbines on their property. They're also required to immediately dispose of carcasses. Even with post construction mortality research, access by leaseholders and wind energy employees has never been restricted during studies.

6.2.5 Disposal of Animal Carcasses. Owner agrees to take all reasonable measures to avoid attracting scavenging birds and other animals by ensuring all animal carcasses on the Property are immediately (to the extent permitted by applicable law) burned, buried, adequately and completely composted by covering with an adequate amount of earth or mulch, cooked or placed in enclosed containers with lids if such carcasses will be removed at a later time from the Property. Animal carcasses shall not be left in open fields or adjacent to buildings and shall not be left uncovered or exposed.

Since 1997, nobody involved with wind energy and its eagle carcasses, has been allowed to disclose the truth.

Dead Eagle numbers

The Interior Department and USFWS claim that they keep no records for the origin of these eagle carcasses.

An Email I received from USFWS agent Jill Birchell in 2016, confirmed this government protocol of secrecy.

"Hi Jim,

I checked with our repository and learned that they don't keep detailed records of where the eagles they receive come from."

Up to the year 2014, the Repository did report eagle carcasses being received and processed. For 2014 they reported receiving 2309 eagle carcasses for dispersal to American Indians and noted others that had not been counted, which would likely bring totals to about 2400. Since 2014 the numbers of eagle carcasses being processed for the Native Americans is no longer being given out.

NATIONAL EAGLE REPOSITORY ANNUAL REPORT: 10/01/13 – 09/30/14						
REGION	WHOLE EAGLES AND EAGLE PARTS RECEIVED		WHOLE EAGLE ORDERS FILLED	EAGLE FEATHER & PARTS ORDERS FILLED	COMBINED FILLED ORDERS BY REGION	
		REGION TOTAL	BALD/GOLDEN	BALD/GOLDEN		
1		239	135	376		511
2		65	479	1,113		1,592
3	Iowa Region	591	129	357		486
4		352	24	114		138
5		229	24	110		134
6		492	170	519		689
7		216	3	13		16
8		125	62	240		302
TOTAL		2,309	1,026	2,842		3,868
NEW REQUESTS RECEIVED						
	BALD EAGLES	1,176	LAST REPOSITORY Report Published			
	GOLDEN EAGLES	1,795				
	EITHER SPECIES	1,379				
	TOTAL	4,350				
NOTES: The incoming bird count is not complete as we are still evaluating birds received in September. The final total number of birds and bird parts received will probably be about 2,400. The total number of eagles and parts shipped, as well as the number of new requests received are complete as of 10/22/14. 2842 "parts" orders due to more eagles hit by turbines now being found more mutilated						

But this eagle carcass story doesn't end with just Repository Eagles being processed for American Indians. There are many other carcasses because "clean" eagles are required for ceremonies; eagles that have died as a result of electrocution, vehicle collision, unlawful shooting or trapping, poisoning or from natural causes are unacceptable for ceremonial sacrifice.

In 2014 NBC did a story on the Denver Repository 2014. In this story about recycling eagles to American Indians, the repository reported that they had processed about 42,000 eagle carcasses. This Interior Department facility was opened in 1995.

<https://www.nbcwashington.com/news/local/protecting-eagles-in-life-and-death/1985909/>

In the interview discussing Wildlife Repository Specialist Dennis Wiist, this was revealed ... "But at last count, almost 42,000, he's touched nearly every eagle that's come through this facility."

Add another 8 years of receiving 2500-3000 eagles and about anyone past the eighth grade can come up with an estimate of over 60,000 eagle carcasses since 1995. It's hard to imagine and even harder to stomach, but over 60,000 eagle carcasses have secretly shipped to this repository, with no cause of death or origin given. When Shasta County approved the Hatchet Ridge wind project, this county became a part of this green fraud on America.

If federal prosecutors really wanted prosecute green energy's eagle kills

Even though the USFWS won't report the carcasses it would still be fairly easy to prove what's taking place with America's hidden eagle carnage through indirect means. Sort of like using cell phone tracking data to convict a murderer.

The prosecution of 150 eagles killed since 2012 is nothing to get excited about when nothing has been done about tens of thousands of other eagles killed by wind energy. America's silenced USFWS agents know exactly what's taking place because they process and arrange FedEx overnight shipping for nearly all the eagle carcasses shipped to the Denver Eagle Repository.

If federal prosecutors wanted the truth, a look into FedEx records would give investigators a very good idea what's taken place. From FedEx they would know the origin of shipments, they would see the proof of millions paid out by the US government for overnight shipping and the weight of crates would indicate the number of eagles per shipment. Surveillance on the Repository site in Denver would also clue investigators in on the number of Fed Ex shipments coming in per week.

Another way for prosecutors to get to the truth about green energy's eagle carnage, they could start interviewing leaseholders. I know of one case (have documents) where a dead bald eagle was found near a turbine and it was reported by someone that hadn't signed a lease. When agents arrived at the property, the eagle was nowhere to be seen because the leaseholder had already disposed of it.

At some point, if a Shasta County prosecutor wanted to do something similar with Hatchet Ridge, I could help them with a few other ideas.

Wind energy calculations that show 4-5 times less turbine energy actually being produced for the grid

Recently I looked into Wind energy's contribution to an isolated energy grid in Nome, Alaska then compared it to Iowa's glowing Wind energy production numbers.

As I discovered, green energy calculations have very little to do with reality. But by using "Green" energy math methodology and with the help from our politicians, Iowa is able to make claims about producing almost 60% of Iowa's electrical energy from wind.

It's not true, and an analysis of the grid in Nome, Alaska explains why.

11,660 megawatts

Iowa's wind generation capacity of **11,660 megawatts** in 2020 provided just shy of 60% of the state's electricity last year. EC highlighted the need to reach 11,000 megawatts of wind capacity by 2022 to stay on track for a 2050 goal of 100% renewable energy in our publication Iowa's Road to 100% in April 2021.

<https://www.iainvironment.org/newsroom/energy-news>

[Iowa Nears 60% Wind Energy Generation Milestone - Iowa ...](#)

About featured snippets • Feedback

This report from Alaska is extremely interesting because Nome Alaska has a completely isolated electrical grid. In order to survive, the people of Nome have to depend on diesel generators and an intermittent supply of wind energy. By the way, the winds around Nome are considered prime for wind power generation.

ACEP Technical Report

Nome Wind-Diesel System Overview

Chris Pike and Nathan Green

DRAFT Report – November 1, 2017

A report for the Alaska Energy Authority as part of the Renewable Energy Fund
Data Collection and Analysis Effort

Nome, Alaska

Nome has two Wärtsilä 5.4 MW diesel generators, which alternate to supply power. A 3.6 MW Caterpillar generator is used during the off-peak summer hours when demand is low; a 1.8 MW Caterpillar generator is used to augment peak loads during winter afternoons. A 0.4 MW diesel generator is used as a black start unit in case of a black out and can support lower temporary peaking requirements.

Presently, NJUS operates one of the most efficient diesel powerhouses in Alaska, with an average kWh/gal of 15.8 for the period of July 2015 through June 2016, according to power cost equalization (PCE) records.

Initially the Nome wind project consisted of eighteen 50 kW Entegritty turbines. After the full value of the tax credits was realized by Banner Wind LLC, the company sold the Banner Wind project to NJUS along with the long-term lease for the land, effective January 2015. In 2013, two additional 900 kW wind turbines were installed by the utility, using millions in funds from the Alaska Renewable Energy Fund program and a contribution from the local fishing community development quota program, Norton Sound Economic Development Corporation.

Today all of Nome's smaller Entegritty turbines have been shut down due to grid inefficiency and high costs. The project lasted about 10 years but the two larger .9 MW turbines still remain.

Nome Joint Utility System (NJUS) Assistant Manager Ken Morton:

"The cost to maintain the smaller units has increased to the point that the cost of the diesel fuel they displace no longer pencils out."

"NJUS does not at this time have plans to replace the turbines or add additional ones. However, if grant funding becomes available for additional turbines, as well as funds for a battery system that would allow for greater reliance on wind energy, NJUS would pursue that."

In 2021 the Nome Joint Utility System allocated funds to have all their [original 18 turbines](#) to be taken down.

Iowa Wind

So, what does all this have to do with Iowa?

Nome used real world numbers to determine the value and contribution from wind energy for their customers. A 2017 report (see image) said the [actual contribution](#) ("penetration") to Nome's grid in 2015, averaged out to a pitiful 6.3% (see image).

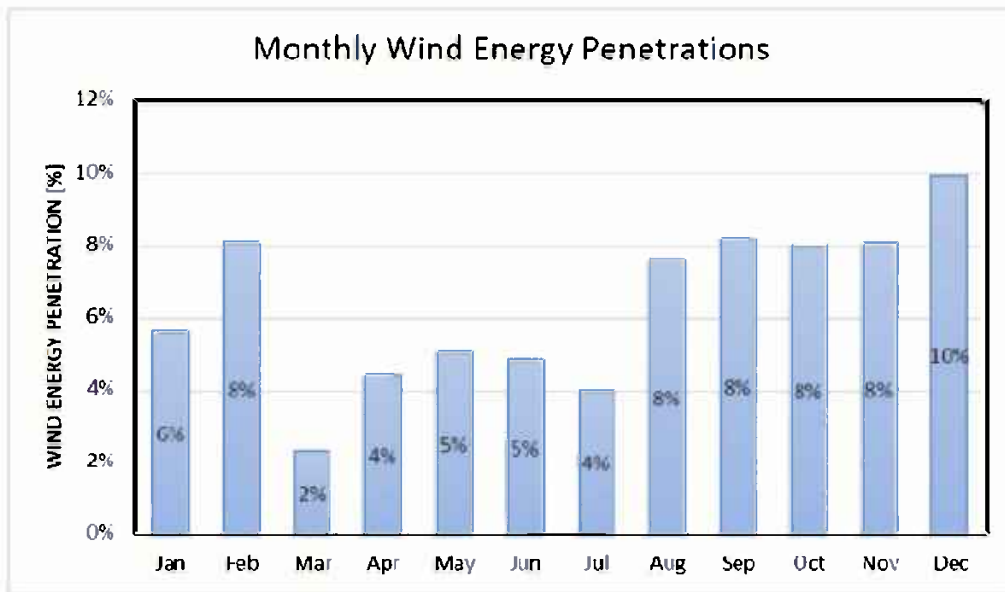


Figure 13. Wind energy penetration by month. To arrive at these figures, the total wind energy fed to the grid each month is divided by the total energy generation each month from all generation sources.

6.3 % yearly average

These are grid numbers and calculations never disclosed from America's other 49 states. The primary reason, Nome's utility district is trying to survive as efficiently as possible while developers and utilities in the other states are busy soaking taxpayers.

Nome Alaska 2015 electric profile

Wind 2.7 MW percentage of nameplate capacity 33%

Diesel 5.4 MW percentage of nameplate capacity 66%

Total 8.1 Wind energy's annual contribution to Nome grid 6.3%

With their baseload diesel generators compared to installed the wind energy nameplate capacity, Nome had an installed diesel to wind 2 to 1.

Iowa's 2020 electric profile

Wind 11,322.5 MW percentage of nameplate capacity 50%

Coal and other sources 11,147.9 MW percentage of nameplate capacity 50%

Total nameplate capacity 22470.4 MW

[Iowa](#) has an installed capacity ratio of about 1 to 1 when their baseload energy sources are compared to installed nameplate wind capacity. Iowa does have a greater

percentage of installed wind capacity than Nome. But if we double Nome's wind energy capacity to equal Iowa's 50% wind mix, the annual contribution Nome's utility would still only achieve about a 12.6% contribution to their grid from wind.

When compared to Nome, Iowa has far more energy transmission losses for wind energy because consumers in Nome are located only 4.5 miles from their wind farm. But assuming all things being equal, including annual wind speeds, Using the same the wind mix/grid penetration calculations from Nome, means that all of Iowa's thousands of turbines, still only contribute about 12-13% of the Iowa's usable energy to the grid.

In a previous post, I said Iowa, grid requirements need constant [base loads](#) of 3000 – 4500 MW. These were old very conservative numbers taken from an Iowa energy site. Today's Iowa's average base load requirements from coal and sources besides wind, are very likely 6500-7000 MW or about 60,000,000 MWh per year.

These energy numbers for Iowa's grid are real and are nowhere to be seen with wind energy reporting. It sure appears that Iowa is using fraudulent wind energy estimates to collect an abundance of Production Tax Credits along with selling regular energy created in fossil fuel plants, as being green.

Iowa's true wind energy value to customers is likely being deliberately overstated between four and five times. The same holds true for every bit of the [EIA](#) wind energy data posted for CA and all other states as well.

In conclusion, this is truly a horrendous industry and the approval of Hatchet Ridge was a monumental mistake by Shasta County Supervisors. For the good of this county, let's hope that Hatchet Ridge is the last wind project to ever be approved in Shasta County.

Jim Wiegand - Lakehead CA

*

Additional supporting images shown below:

Iowa Electric Profile (2020 - Including Non-Utility Generation)

ELECTRIC GENERATION IN IOWA BY PRIMARY ENERGY SOURCE	2020 NAMEPLATE CAPACITY (MW)¹	PERCENT OF NAMEPLATE CAPACITY	2020 GENERATION (MWH)²	PERCENT OF GENERATION
Coal	5,754.7	25.61%	14,146,835	23.72%
Wind	11,406.9	50.76%	34,182,302	57.32%
Nuclear	0.0	0.0%	2,904,863	4.87%
Natural Gas	4,215.0	18.76%	7,036,824	11.80%
Hydro	129.2	0.58%	1,025,215	1.72%
Other & Other Renewables	22.0	0.10%	207,440	0.35%
Petroleum	924.2	4.11%	111,111	0.19%
Solar	18.4	0.08%	22,082	0.04%
Total	22,470.4	100.00%³	59,636,672	100.00%³

1	Table 4. Electric power industry capacity by primary energy source, 1990 through 2020						
2	Iowa						
3	megawatts						
4		Year 2020	Year 2019	Year 2018	Year 2017	Year 2016	Year 2015
39	Total electric industry	21,333.2	20,409.5	18,842.2	17,670.8	17,045.5	16,8
40	Battery	1.4	1.1	1.1	-	-	-
41	Coal	5,284.0	5,343.8	5,371.7	5,497.9	5,548.8	6,2
42	Hydroelectric	150.4	146.4	146.4	146.4	144.9	1
43	Natural gas	3,694.7	3,647.1	3,580.7	3,571.1	2,931.8	2,6
44	Natural gas - CC	1,816.2	1,829.0	1,779.8	1,772.6	1,121.1	1.1
45	Natural gas - GT	1,228.4	1,226.8	1,260.4	1,265.7	1,140.3	1.1
46	Natural gas - IC	106.5	96.4	97.2	91.4	92.4	-
47	Natural gas - ST	543.6	494.9	443.3	441.4	578.0	3
48	Nuclear	-	601.4	601.4	601.4	601.4	6
49	Other	-	-	-	-	-	-
50	Other biomass	20.6	20.6	21.4	21.4	21.4	-
51	Petroleum	841.6	851.7	854.0	852.7	1,022.9	1,0
52	Petroleum - GT	204.1	205.3	201.5	202.1	385.9	4
53	Petroleum - IC	605.5	614.4	613.0	618.6	605.0	6
54	Petroleum - ST	32.0	32.0	39.5	32.0	32.0	-
55	Solar	18.0	13.4	8.9	7.7	2.6	-
56	Solar- PV	18.0	13.4	8.9	7.7	2.6	-
57	Wind	11,322.6	9,784.0	8,256.6	6,972.2	6,771.7	6,1
Other biomass includes agricultural byproducts, landfill gas, biogenic municipal solid waste, other biomass (solid, liquid and gas) and sludge w							
Other gases includes blast furnace gas, and other manufactured and waste gases derived from fossil fuels.							
Other includes non-biogenic municipal solid waste, batteries, chemicals, hydrogen, pitch, purchased steam, sulfur, tire-derived fuels, waste							
58	Source: U.S. Energy Information Administration, Form EIA-860, Annual Electric Generator Report.						
59							
<div><div>►</div><div>1. Summary</div><div>2A. Plants-Capacity</div><div>2B. Plants-Generation</div><div>3 Retailers</div><div>4. Capacity</div><div>5</div></div>							

Fake numbers

1	Table 5. Electric power industry generation by primary energy source, 1990 through 2020					
2	Iowa					
3	megawatthours					
45	Total electric industry	59,636,671	61,673,544	63,380,569	57,909,568	54,395,000
46	Battery	-60	-94	0	-	-
47	Coal	14,146,835	22,159,203	28,552,999	25,358,230	25,150,000
48	Hydroelectric	1,025,215	796,268	924,861	1,033,940	910,000
49	Natural gas	7,036,824	7,684,253	7,340,070	4,567,447	2,960,000
50	..Natural gas - CC	5,971,857	6,892,269	6,409,135	3,746,433	2,410,000
51	..Natural gas - GT	479,512	386,174	518,450	343,837	190,000
52	..Natural gas - IC	2,769	10,192	3,200	12,169	-
53	..Natural gas - ST	582,687	395,617	409,286	465,008	340,000
54	Nuclear	2,904,863	5,235,716	4,895,399	5,213,509	4,700,000
55	Other	0	0	0	2,382	1,000
56	Other biomass	199,395	203,122	209,177	207,859	250,000
57	Petroleum	111,111	238,192	110,565	146,719	210,000
58	..Petroleum - GT	671	101,527	3,049	25,607	40,000
59	..Petroleum - IC	7,744	9,853	7,610	24,555	10,000
60	..Petroleum - OTH	24	67	300	0	-
61	..Petroleum - ST	102,672	126,745	99,606	96,558	90,000
62	Solar	22,082	15,436	11,456	4,838	-
63	..Solar- PV	22,082	15,436	11,456	4,838	-
64	Wind	34,182,302	25,328,971	21,334,067	21,372,752	20,000,000
65	Wood	8,105	12,478	1,986	1,890	-
Other biomass includes agricultural byproducts, landfill gas, biogenic municipal solid waste, other biomass (solid, liquid and gas) and other gases includes blast furnace gas, and other manufactured and waste gases derived from fossil fuels.						
Other includes non-biogenic municipal solid waste, batteries, chemicals, hydrogen, pitch, purchased steam, sulfur, tire-derived fuels.						
Note: Totals may not equal sum of components because of independent rounding.						
66	Source: U.S. Energy Information Administration, Form EIA-923, Power Plant Operations Report and predecessor forms.					



From: [Lon Alward](#)
To: [SCPlanning](#)
Subject: #2022-014
Date: Thursday, May 12, 2022 9:59:14 AM
Attachments: [image003.png](#)
[image004.png](#)
[image005.png](#)
[image006.png](#)
[image007.png](#)
[image008.png](#)
[image009.png](#)
[image010.png](#)

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Please vote yes on resolution #2022-014



<!--[if !vml]--><!--[endif]--> **Lon Alward** | Loan Officer

NMLS 284494 | CA-DOC284494 | ID NLO-20907

Direct 530.605.4870 **Cell** 530.515.1086

Office 530.244.6830 **Fax** 530.222.3270

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From: [Anita Brady](#)
To: [SCPlanning](#)
Subject: Ordinance to eliminate wind farms in the county
Date: Monday, May 9, 2022 8:41:14 PM

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You are worried about wind farms but OK a development that puts lives and property at risk ?

You have shown your true colors-- developers can buy your influence, wind farms? (not so much)

Shame on you all. Please submit your resignations immediately.

Regards
Anita Brady
Born and bred in Shasta County

From: [Catherine Camp](#)
To: [SCPlanning](#)
Subject: Proposed ban on wind farms
Date: Tuesday, May 10, 2022 11:15:42 AM

EXTERNAL SENDER: Do not follow links or open attachments unless you recognize the sender and know the content is safe.

I strongly urge you to reject the proposed ban on wind farms throughout the unincorporated areas of the county. I can't imagine why this is a good idea. Any proposed wind farm will come before the county and can be considered on the specific merits. Wind energy in general is clean, cheap and renewable. The proposed preemptive ban has the feel of a political statement rather than a considered assessment of how the county confronts energy needs, climate challenges and economic challenges for families. Please vote no.

**DOUGLAS W. CRAIG, PsyD
CLINICAL PSYCHOLOGIST
1650 OREGON ST., SUITE 110
REDDING, CA 96001
LICENSE No. PSY 9469**

May 11, 2022

Shasta County Planning Commission
1855 Placer St Suite 103
Redding, CA 96001

Re: Proposed Amendments to Shasta County Zoning Code to Prohibit Large Wind Energy Systems (Amendment 22-0001)

Dear Chair and Members of the Planning Commission:

Last month, UN Secretary-General António Guterres issued his most dire warning ever on the catastrophic transformations we are facing as we continue to rely on fossil fuels for our energy and transportation needs.

He said, "We are on a fast track to climate disaster. Major cities under water. Unprecedented heatwaves. Terrifying storms. Widespread water shortages. The extinction of a million species of plants and animals. This is not fiction or exaggeration. It is what science tells us will result from our current energy policies."

He continued, "We are on a pathway to global warming of more than double the 1.5°C limit agreed in Paris. Some Government and business leaders are saying one thing, but doing another. Simply put, they are lying. And the results will be catastrophic. This is a climate emergency.

"Climate scientists warn that we are already perilously close to tipping points that could lead to cascading and irreversible climate impacts. But, high-emitting Governments and corporations are not just turning a blind eye, they are adding fuel to the flames.

"They are choking our planet, based on their vested interests and historic investments in fossil fuels, when cheaper, renewable solutions provide green jobs, energy security and greater price stability.

"The science is clear: to keep the 1.5°C limit agreed in Paris within reach, we need to cut global emissions by 45 per cent this decade."

Guterres outlined the solution. He said, "First and foremost, we must triple the speed of the shift to renewable energy. That means moving investments and subsidies from fossil fuels to renewables — now. In most cases, renewables are already far cheaper. It means Governments ending the funding of coal, not just abroad, but at home.

"A shift to renewables will mend our broken global energy mix and offer hope to millions of people suffering climate impacts today. Climate promises and plans must be turned into reality and action, now. It is time to stop burning our planet and start investing in the abundant renewable energy all around us."

Here in Shasta County, we are facing the triple threat of excessive heat, devastating drought and disastrous wildfires. As we continue to emit heat-trapping greenhouse gases into the atmosphere, we are stealing our children's future. We don't have to do this. It is not too late. We need to dramatically transition away from dirty fuels and toward renewable energy like wind and solar as quickly as possible.

Banning Large Wind Energy Systems in Shasta County is madness and incredibly irresponsible. Are we going to stand on the sidelines while other communities step up to do all they can to preserve a livable planet for future generations? Will history show that Shasta County shirked its duty, ignored the science and betrayed its moral obligation to care for others?

I beg of you to not amend Shasta County's code to prohibit large wind energy systems. This would be insane. Instead, send a message to our community that we will join with the rest of the world in bringing about the clean energy revolution that the world's biosphere desperately requires now.

Sincere regards,

Douglas W. Craig

Subject: Zone Amendment 22-0001, Regulation of Wind Energy Systems County-Wide (Zoning Text Amendment) - Agenda Item R5, on Planning Commission Agenda for May 12th, 2022

Greetings Shasta County Planning Commissioners

I write you regarding resolution No. 2022-014, a resolution of the Shasta County Planning Commission recommending that the Shasta County Board of Supervisors approve Zone Amendment 22-0001, regulating small and large wind energy systems. I support the prohibition of large wind energy systems within the unincorporated areas of Shasta County for the purpose of protecting and promoting the public health, safety, and general welfare of all the residents of Shasta County.

This resolution came about as a result of our “community active efforts” involving the stopping of the Fountain Wind Project. Most importantly for myself, the protections of tribal prayer grounds, village sites, sacred places, tribal burials and other vital tribal cultural sources. The Pit River Tribal Nation, with over 4,000 Tribal members, passed and presented their Resolution opposing such industrial wind developments- the Fountain Wind Project. Tribal Band Representatives and Tribal members who testified with insurmountable evidence at both public hearings, stating how offensive these developments were with no regard for the unavoidable negative impacts to tribal cultural sacred places, burial grounds, the ecology, the biology, the wildlife (including raptors, bats, birds etc.), the aesthetics, and etc. Also, the continued and growing threat of wildfires that would be an impediment to fighting them when caused by industrial scale wind energy systems. Equally important, is the information provided by the staff and Commissioner Kerns in their presentation on the number of wildfires in Shasta County in the most recent past. The CalFire wildfire assessment Map was also presented in which over 95% of the County was rated “High” or “Very High” Wildfire Severity Zones. The above statements alone provide enough for you the vote YES!

This Commission discussed the need for zoning changes in January of 2022 and then directed Mr. Hellman’s staff to put together the Resolution to present to the Supervisors for consideration. Resolution No. 2022-014 captures the items discussed and requested by the Commission. Mr. Hellman, provided all the necessary background, including CEQA law review, which supports the decision to implement the zoning changes listed within the proposed Zone Amendment 22-0001, enabling the protection of the communities across Shasta County most affected by these types of industrial developments. Various experts provided overwhelming testimony, during the recent public hearings, that industrial wind turbine developments in forested areas only introduce unnecessary wildfire risk where wildfires could not be fought effectively within/surrounding the turbine fields. These expert testimonies were provided by at least 6 wildfire pilots whose careers have thousands of hours of wildfire fighting experience. One of those experts attended the Supervisor’s public hearing for the Fountain Wind Appeal, while on a break from fighting the Dixie Fire, where he had also dropped retardant on the Fawn Fire- it was powerful testimony!

This Commission denied the Fountain Wind Project in order to protect and promote the public health, safety, and general welfare of the community members. It has already been proven, even stated by the Fire Safety Representative from Shasta County, and addressed to Supervisor Moty, that the preparation work and clearing for these industrial projects bring their own risk so it is as not as “clear cut” for fire safety through the environmental review process. As stated on numerous occasions, by various experts, these types of industrial developments. Therefore, please continue taking the hard look and protect and promote the public health, safety, and general welfare of OUR WHOLE COMMUNITY!

I acknowledge your proactive efforts with these zoning amendments, just as has been done in other counties, which provide protections to the tribal cultural resources, environment, safety, protection, and general welfare of the community members. In the Big Bend area it is a fact that developers continue to test for wind resources, therefore, it is imperative that you pass this Resolution Zone Amendment now. It will only be a matter of time before the County receives the next special use permit for a mega-industrial wind development project in our forested areas. The Zone Amendment 22-0001 rightly seeks to ban industrial scale wind energy development in the unincorporated lands of Shasta County, it further accurately defines small scale wind energy systems in County Code and clearly defines how variations to allowed small wind energy systems would be considered by the County Planning Department. You know that the financial benefits do not outweigh the negative impacts and the risk to the lives of County residents. A “Yes” vote doesn’t ban clean energy, it just bans industrial size wind energy systems that pose a risk to our way of life and our lives themselves. Shasta County has provided well above their fair share of clean energy and can continue to do so through other clean technologies without the risk to life and property and our general welfare.

Approve Resolution No. 2022-014, which supports the zone changes for Zone Amendment 22-001, prohibiting additional large scale industrial wind developments within Shasta County. The approval of Resolution No. 2022-014 will support the communities targeted, even for their marginal wind resources, and stop the emotional and financial trauma brought to the community members who are threatened by these industrial developments. The approval will also remove the fear and threats of future desecration and the erasure of tribal cultural ceremonies and sacred sites protections for the Pit River Tribe and other surrounding Tribes.

Sincerely,

Radley Davis, Concerned Resident
Tribal Citizen of the Pit River Nation belonging to the Illmawi Band

From: [cdjmd7160](#)
To: [SCPlanning](#)
Subject: R5 Zone Amendment 22-0001
Date: Wednesday, May 11, 2022 1:56:20 PM

EXTERNAL SENDER: Do not follow links or open attachments unless you recognize the sender and know the content is safe.

I have been a resident of Montgomery Creek since Feb. 1, 1990.

First of all, I wish to thank the Planning Department and particularly the Planning Commission for your 5-0 vote denying the Use Permit for ConnectGen, and the many hours of checking all the pros and cons before coming to that decision. It was a wonderful victory for the "little guy"! And you all are to be commended for this.

I believe these large environmental projects target low income and sparsely populated areas, because they think there will be no opposition from these areas, possibly because of little education. Of course, they care nothing about the land or its residents, out only to make millions in profits. But, they found out with the Stop Fountain Wind group, there are some very intelligent educated residents in this area, that helped to beat this project. It took almost 3 years of diligent work for our Committee of 12 to present the downside of this project. We also thank you for helping protect this area from wildfires. This year wildland fires are predicted to be much worse.

My husband and I were members of the Montgomery Creek Volunteer Fire Company 71 for 12 years; we had only been members of this Company for 6 months before the Fountain Fire came running through. I remember standing on the side of Highway 299E in Montgomery Creek watching the Fountain Fire coming up both sides of the highway, destroying everything in its path, and assisting those evacuating with nothing but their vehicle and the clothes on their back to the Montgomery Creek School parking lot. This fire went all the way over Hatchet Summit into the Burney area, which stunned many people.

I live on the side of a hill, and my view includes Hatchet Ridge Turbines, a photo of which I have attached. I would have seen all of the Fountain Wind Turbines from my home and they would also have been reflected off of a mirrored wall into my Living Room, making its value decrease and perhaps not sellable. In my 32 years here, I have had many people come here, for various reasons, and they always remark what a wonderful and great view I have. I call this my "little piece of Heaven"!

I would ask that you approve your Zoning Amendment to protect this area of wildland fire devastation; we thank you especially for the work you have done in these last few months to bring this Amendment forward, even though the Environmentalists are doing their best to get your Commission to not approve it.

I want to thank the commission for pursuing this amendment, regardless of opposition.

Sincerely, Joan DiMaio



REV-SLWP0000023.00045

From: [Diane Dobbins](#)
To: [SCPlanning](#)
Subject: Re: Wind farm future for Shasta County
Date: Tuesday, May 10, 2022 10:16:00 AM

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Thank you - yes, I hit send too quickly.

I want to add my voice in support of wind farms for this county. We moved here 5 years ago and are constantly beset with strong winds. Whether that's just the way it is in the north state or it's climate change is aside from the fact that we do have winds on a regular basis. That said, I think it is short sighted not to approve wind farms to produce electricity and reduce the burden on shasta county residents. I do not buy into conspiracy theories that they are killing all our eagles or that they cause cancer. The science does not back this up.

So here's my voice in support of wind farms and hope the planning commission is smart and doesn't succumb to people who just don't want change

Sincerely,
Diane Dobbins

Sent from my iPhone

> On May 10, 2022, at 8:11 AM, SCPlanning <scplanning@co.shasta.ca.us> wrote:

>

> Good Morning,

>

> There doesn't appear to be a message or an attachment to this email. If you had one of those, you might want to try this email again.

>

> Tracie Huff

> Administrative Secretary I

> Planning Division

> Shasta County Resource Management

> 1855 Placer Street STE 103

> Redding CA 96001

> (530) 225-5532 Phone

> (530) 245-6468 Fax

> resourcemanagement@co.shasta.ca.us

>

>

> -----Original Message-----

> From: Diane Dobbins <diane.dobbins@gmail.com>

> Sent: May 10, 2022 6:28 AM

> To: SCPlanning <scplanning@co.shasta.ca.us>

> Subject: Wind farm future for Shasta County

>

> EXTERNAL SENDER: Do not follow links or open attachments unless you recognize the sender and know the content is safe.

>

>

> Sent from my iPhone

From: [Ron Dykstra](#)
To: [Paul Hellman](#)
Subject: Re: Zone Amendment 22-0001 (Wind Energy Systems Ordinance)
Date: Thursday, May 12, 2022 11:26:28 AM

EXTERNAL SENDER: Do not follow links or open attachments unless you recognize the sender and know the content is safe.

Thank you for trying to contact me even going the extra mile with an email. I'm beginning to think there is some incompatibility between my phone and the county phone system. Seems I only have trouble getting county calls. Maybe I'll have to go to TMobile to troubleshoot the problem. Anyway, thanks again. Below are the comments I had planned to present today.

"Mr. Chairman and commissioners.

My name is Ron Dykstra and I'm a long time Shasta County resident. I had hoped to deliver these comments in person, but am recovering from Covid, so I've sent them in by email.

I hope you all had a chance to look at my written comments, which I transmitted on Monday. I respect the fact that you are concerned about the health and welfare of Shasta County residents, that is as it should be. But as I stated in my comments, no harm will come to our county if you don't adopt the proposed resolution. Potential adverse impacts from wind farms such as wildfires obviously can't occur until a project is built, if they occur at all. And your ability to reject a project is not affected if you don't adopt this resolution. One of you mentioned in the April meeting that one reason for these proposed ordinance changes was that it is too difficult to pick and choose which sites would be suitable for wind projects. But it's not necessary for the commission to do this picking and choosing ahead of time. Let the project proponents pick what they deem to be a suitable site along with proposed project mitigations, and then let them convince you of the project's merits, or not. You have the power to reject any future wind farm proposals if you deem them unsuitable. And that's the course you should take, reject this proposed amendment and then you can examine any future proposals on their merits. Don't completely eliminate the possibility of future wind projects that could benefit from better siting, improved technology, and additional mitigations.

Please don't adopt this resolution.

Thank you"

On Thursday, May 12, 2022, 09:26:34 AM PDT, Paul Hellman <phellman@co.shasta.ca.us> wrote:

Ron,

After unsuccessfully attempting to return your call at (530) 262-0271 several times, I thought I would send you an e-mail instead. There are no remote participation options available for Planning Commission meetings. I provided your May 9th comment letter to the commissioners. If you would like to provide any additional written comments, please send them to me and I'll provide them to the commissioners if they are received prior to around noon.

Thanks,

Paul Hellman, Director

May 9 2022

Shasta County Planning Commission
1855 Placer St Suite 103,
Redding, CA 96001

Re: Proposed Amendment 22-0001 to Shasta County Zoning Code to Prohibit Large Wind Energy Systems, May 12th meeting, Item R5

Dear Chair and members of the Planning Commission:

On April 11th, I transmitted comments regarding this issue for a group of which I am a member, North State Climate Action (NSCA). My comments today represent solely my views and may not reflect the opinions of NSCA.

My comments primarily address firefighting information you discussed at the April 14th meeting. Other concerns were addressed in opposition comments transmitted for the April meeting. Fire fighting ability for any wind farm proposal should be analyzed on a site-specific basis, not on the assumption that any fire at any proposed county wind farm is un-fightable.

At the April 14th meeting, a commissioner stated incorrectly that wind towers “take out aerial attack.” CalFire’s Bret Gouvea addressed this issue at the Supervisor’s meeting last October (see the [recording of the meeting](#) at 8:19:39 to 8:28:00). Mr. Gouvea noted that the largest capacity aerial fire fighting equipment would not be usable close to wind towers such as at Fountain Wind, but other aerial fighting equipment would be. Mr. Gouvea stated “When you say a no fly zone, that’s a very broad term, I can’t agree to that.” And the configuration of wind towers in any project are critical to analyze fire fighting capabilities. In his comments Mr. Gouvea noted, as per the CalFire Tactical Air Unit, that “Obviously the placement and separation of those wind towers dictate the use of aircraft.” A future wind farm project would not be identical to Fountain Wind, and tower placement must be considered in assessing fire fighting ability, including aerial attack. If the Fountain Wind project had presented insurmountable fire fighting difficulties, it seems that Mr. Gouvea would have so stated. But he did not.

The commission should have been more precise in its framing of the firefighting issue. The commission characterized all of Shasta County as an “extreme” fire hazard zone. This is not how CalFire characterizes county fire danger. CalFire mostly regards the county as high and very high fire danger, not extreme. Also, approximately 12,000 acres in Shasta County are not designated either high or very high fire danger by the [CalFire Fire Hazard Severity Zones in SRA](#) map. This map does not provide fire hazard designations for those areas that are federal firefighting responsibility so this 12,000 acre value could be an underestimate. The [map that was shown at the April](#) meeting designates about 150,000 acres as less than a very high fire danger area, but does not further categorize those areas. As you know, the Fountain Wind project was in a very high fire danger zone in accordance with that map. Future wind projects may not be in that zone or even in a high fire hazard zone. [The County fire hazard map](#), although outdated, designated about 30,000 acres as moderate fire danger areas, and about 50,000 acres were unclassified. Over 300,000 acres were designated as high fire danger (as opposed to very high). I don’t know the property ownership or wind resources in areas designated as less than very high fire hazard, but the county will be prohibiting wind farms in lesser fire concern areas if the ordinance changes are implemented.

The commission displayed a map showing relatively recent fires in Shasta County. I don't understand the purpose of this graphic. We all know that the county has suffered from many severe fires in the recent past. But how is that relevant to vetting future wind farms for fire fighting ability near them? And future proposals would need an identical fire impact analysis as Fountain Wind, through CEQA.

The commission stated the issue of wind farms in Shasta County has been studied for the last 2-1/2 to three years, but is that the case? The commission has been primarily studying the Fountain Wind project, and that is not equivalent to studying wind projects in general in the county. The impacts of the Fountain Wind project are not necessarily relevant to a proposed future project. Site specific configuration, benefits, and impacts of future projects should be considered on a case by case basis.

The commission stated that everything about wind farms had been discussed, and no new information has been presented since the commission denied the Fountain Wind project in June. But a new proposed wind project, by its differing location and configuration, would necessarily include new information.

Lastly, a photograph of spent fiberglass turbine blades in a landfill was presented by the commission. I hate to see these blades not being recycled, but fiberglass is hardly a dangerous or hazardous waste that will result in groundwater or surface water contamination, or any other adverse outcome. Previously, formaldehyde had been used in turbine blade manufacture, but that is being phased out. Wind power is not yet a mature industry and land filling of spent turbine material is not a given. The reuse of spent fiber glass is now being studied and even implemented in certain cases. In addition, turbine blade manufacture using thermosetting resins is being studied. Thermoplastic resin blades would be recyclable, and also lighter and cheaper than fiberglass.

You should not recommend a county wide prohibition on wind farms, and you should analyze any future wind farm proposals considering their unique benefits and impacts. Shasta County can be a leader in supporting appropriate renewable wind projects. Before you make a decision on these ordinance changes, you must ask yourselves what is the harm done to the county if the changes are not adopted. The simple and correct answer is that there is no harm. If a project is proposed in the future, that is the time to examine its health, safety, and other environmental issues.

Please do not recommend that the Board of Supervisors adopt the proposed ordinance changes.

Thank you

Ron Dykstra

From: [Ginny Erickson](#)
To: [SCPlanning](#)
Cc: [Virginia Erickson](#)
Subject: Wind Farm
Date: Saturday, May 7, 2022 1:38:59 PM

EXTERNAL SENDER: Do not follow links or open attachments unless you recognize the sender and know the content is safe.

Please know that many of us approve of and have hopes that the wind farms will become a reality in Shasta County.

Virginia Erickson

From: [Daniel Fehr](#)
To: [SCPlanning](#)
Subject: Wind Farm Resolution
Date: Tuesday, May 10, 2022 10:52:23 AM

EXTERNAL SENDER: Do not follow links or open attachments unless you recognize the sender and know the content is safe.

May 10, 2022

Honorable Shasta County Planning Commissioners:

The purpose of this email is to vociferously oppose the pending resolution banning wind farms in unincorporated Shasta County, slated for consideration on May 12, 2022.

Support of this resolution represents the ultimate myopia, resulting in the limitation of an available renewable energy option. If humanity is to reverse this carbon-based climate crisis, Shasta County will require all available tools in our toolbox.

We implore the Planning Commission to oppose consideration of this asinine NIMBY and politically-motivated resolution.

Daniel & Susan Fehr
1705 Verda Street
Redding, California 96001

From: [Jon Ferguson](#)
To: [SCPlanning](#)
Subject: Resolution No. 2022-014
Date: Thursday, May 12, 2022 9:17:58 AM

EXTERNAL SENDER: Do not follow links or open attachments unless you recognize the sender and know the content is safe.

Please vote yes on Resolution No. 2022-014.

From: [John Gable](#)
To: [SCPlanning](#)
Subject: Industrial Wind Turbine Ban
Date: Wednesday, May 11, 2022 8:52:47 PM

EXTERNAL SENDER: Do not follow links or open attachments unless you recognize the sender and know the content is safe.

I write this letter on behalf of all the residents of Moose Camp. First I would like to thank you for researching, deliberating and ultimately rejecting the Fountain Wind project. Second I commend you for proposing the ban on industrial size wind projects in the unincorporated areas of Shasta County. The obvious fire danger in the county along with the inability to fight wildfires from the air within and around turbine farms makes a ban the right thing to do. Los Angeles county banned industrial wind turbines in 2017 and San Bernardino county banned them in 2019. Wind energy production in California has barely increased in the past five years with very few new projects coming online. The future of industrial size turbine farms in California has moved from onshore to offshore. Shasta county should be proud of its ability to already provide enormous amounts of renewable energy to the county and clearly does not need to risk the lives of its residents by adding any more industrial size wind turbines. **Please vote yes on the large wind turbine ban.**

Sincerely,
John Gable
Moose Camp Board President

From: [Betty Harner](#)
To: [SCPlanning](#)
Subject: Ban of Wind Farms
Date: Wednesday, May 11, 2022 11:41:15 AM

EXTERNAL SENDER: Do not follow links or open attachments unless you recognize the sender and know the content is safe.

Shasta County Planning Commissioners:

What are the non-political justifications for banning wind farms in Shasta County? There are so many reasons for developing alternate sources of energy that we have to question this action.

All means of producing electricity seem to have drawbacks, from inconveniently unaesthetic (fields of oil pumps, acres of solar panels) to dangerous pollution (coal fired generators), and the windmills seem to be less offensive than these.

With the continuing drought our reliance on hydroelectric power may not be as assured as in the past, just when the higher temperatures we have been experiencing will mean an even greater need for electricity to power our air conditioners. Wind is one of the natural resources we have in Shasta County; it can provide energy with less pollution and, possibly, bring jobs to the area. Why not use it?

We ask that you consider the long-term effects of your actions today. Banning, or even just delaying the development of, energy production here may negatively affect all of us in the future.

Thank you,

Marion and Betty Harner

Sent from [Mail](#) for Windows

From: [Nancy Kirkland](#)
To: [SCPlanning](#)
Subject: Vote YES on Resolution No. 2022-014
Date: Wednesday, May 11, 2022 5:30:12 PM

EXTERNAL SENDER: Do not follow links or open attachments unless you recognize the sender and know the content is safe.

Please recommend that the Board of Supervisors adopt the ordinance amending title 17, Zoning Plan to prohibit large wind energy systems within the unincorporated areas of Shasta County.

As heard previously in public hearings for the Fountain Wind Project, pilot testimonies provided conclusive evidence that the turbine fields will prohibit aerial firefighting efforts.

Also, please consider that preparing the ground for turbines includes excavation, hauling components to the sites, much concrete is needed, roads will need to be put in for access, Miles of converter cables and stations would owe needed as well as thousands of gallons of diesel needed to set up and maintain them.

There are verified complaints about the nonstop noise that the turbines generate. Right now, half a million birds and bats are killed yearly by them. Some estimate that these deaths will increase to a million and a half deaths/year within 3 years. Also, consider that there the recycling of the rare-earth metals that are contained within the system have not been well studied. Unfortunately, while other components are recyclable, the blades themselves are not. These blades can reach 351 feet long and require large trucks to transport them. Currently, the life of a wind turbine is only 20 years.

The actual CO2 savings that these wind farms are designed to reduce are miniscule, due to the inherent nature of wind energy. There is a study by BENTEK (How Less Became More) which has found that ZERO scientific empirical proof provided by the wind industry to support their claims of consequential CO@ reduction. How much CO2 is generated by a half - two million pound concrete base for each turbine?

Turbines do not provide local jobs nor will they provide 'low cost' energy. Wind energy is much more expensive than anything we have now. Wind is 100% undependable as well. We can never depend on wind to blow consistently or within a certain range.

Energy sources should be abundant, reliable, and low-cost. Wind energy does not fit the need. Wind energy is our least sustainable form of energy-it depends on fossil fuel for construction, delivery, maintenance, and operation.

Please vote YES on Resolution No. 2022-014 on Thursday, May 12.

Thank you, Nancy Kirkland: a Shasta County resident

From: [Michael Knight](#)
To: [SCPlanning](#)
Subject: vote yes on Resolution No. 2022-014
Date: Thursday, May 12, 2022 6:56:15 AM

EXTERNAL SENDER: Do not follow links or open attachments unless you recognize the sender and know the content is safe.

I strongly ask you to vote Yes on Resolution No. 2022-014.

We must do everything in our power ahead of time to reduce the danger of out-of-control wildfires and this area is ripe for one again. Having these huge towers up in this area is an invitation for disaster. Shasta county, not the corporation who owns the towers, will be the one who pays and suffers if wildfire occurs. Stay true to Shasta county residents and keep us safe. Money can be garnered in safer ways than selling us out.

Thank you.

Michael Knight
Round Mountain, CA

knighttoday@gmail.com

From: [Michael Koterba](#)
To: [SCPlanning](#)
Subject: Windmill Ban
Date: Tuesday, May 10, 2022 7:21:04 AM

EXTERNAL SENDER: Do not follow links or open attachments unless you recognize the sender and know the content is safe.

Dear Council Members

To simply ban windmills strikes me as a knee-jerk reaction that reduces the likelihood we will ever have clean sustainable renewable energy at a reasonable cost. We already are losing our ability to produce hydroelectric energy as we have more frequent and multi annual years of drought and reservoirs remain at levels too low to provide consistent electrical power generation. Solar and wind are the only suitable local alternatives. So actions such as this simply mean we will depend on others for our power generation. So who will that be? Companies such as PGE who will simply charge what they want to ensure their stockholders make a profit at our expense. For a county that continuously bristles at outsiders dictating how we live I find actions such as this to be simply demonstrating that we actually haven't got the will to control locally what we really need to be sustainability independent.

From: [Barbara Lawson](#)
To: [SCPlanning](#)
Subject: Wind Developments
Date: Wednesday, May 11, 2022 6:00:12 PM

EXTERNAL SENDER: Do not follow links or open attachments unless you recognize the sender and know the content is safe.

Dear Madam or Sirs,
Please, **vote yes on Resolution No. 2022-014.**
Thank you
B. A. Lawson
Shasta County Resident

From: [Jennifer Levens](#)
To: [SCPlanning](#)
Subject: Wind energy ban
Date: Saturday, May 7, 2022 3:51:58 PM

EXTERNAL SENDER: Do not follow links or open attachments unless you recognize the sender and know the content is safe.

To Whom It May Concern:

Be advised that given the number of trees you are allowing to be destroyed for new housing, you are essentially smothering this area. Now you want to ban a clean source of energy to further the demise of all living things. For shame. For Shame.

Jennifer Levens

From: [John Livingston](#)
To: [SCPlanning](#)
Cc: [Ron Dykstra](#)
Subject: We should not ban large commercial wind farms
Date: Monday, May 9, 2022 8:53:42 AM

EXTERNAL SENDER: Do not follow links or open attachments unless you recognize the sender and know the content is safe.

I have lived in Shasta County for over 55 years and am aghast at the actions of Shasta County Planning Commission and Supervisors. It is completely inappropriate for Shasta County to ban large scale wind farms completely. There is so much positive energy from wind farms and their ability to replace fossil fuels that we need to consider each project on a case by case basis. We would not ban pig farms outright even though they smell terrible and pollute the surface and groundwater. /we would do an analysis of each project and have community meetings and write an EIR and then decide. The Planning Commission should either throw out the proposed ordinance or modify it significantly to allow projects to be considered, analyzed and proper environmental analysis made before making a final decision.

Respectfully John Livingston Resident

On the hope of a new year

by Amanda Gorman National Youth Poet.

May this be the day
We come together.
Mourning, we come to mend,
Withered, we come to weather,
Torn, we come to tend,
Battered, we come to better.

Tethered by this year of yearning,
We are learning
That though we weren't ready for this,
We have been readied by it.
We steadily vow that no matter
How we are weighed down,
We must always pave a way forward.

Excerpt from poem "New Day's Lyric."

From: [Lisa MacDonald](#)
To: [SCPlanning](#)
Subject: Resolution No. 2022-014
Date: Wednesday, May 11, 2022 5:13:42 PM

EXTERNAL SENDER: Do not follow links or open attachments unless you recognize the sender and know the content is safe.

Dear Planning Commission,

Please support the amendment to the zoning changes regarding large & small wind turbine developments. As a resident of Round Mountain and a member of the opposition to the Fountain Wind Project I ask you to vote YES on the resolution. I support the resolution not just because of my opposition to the project in my area but for all citizens of Shasta County that could be tremendously harmed by any such project.

Thank you.

Regards,

**Lisa MacDonald
SUNSET REAL ESTATE
2610 BECHELLI LN.
STE# H
REDDING CA 96002**

**530-941-9082 call/text
530-221-9000 office
SunsetRealEstate.com**

CA DRE LIC #01400197

From: [MaryAnn M](#)
To: [SCPlanning](#)
Subject: Zoning Amendment 22-0001, Agenda Item R5
Date: Wednesday, May 11, 2022 11:22:52 AM

EXTERNAL SENDER: Do not follow links or open attachments unless you recognize the sender and know the content is safe.

To: Shasta County Planning Commission
1855 Placer St Suite 103,
Redding, CA 96001

Comments on the proposed zoning ordinance Amendment 22-0001, Agenda Item R5, for the May 12, 2022 meeting of the Shasta County Planning Commission

In the staff report prepared for agenda item R5 the rationale supporting the proposed regulation of wind energy rests on fire safety issues and fire hazard maps of Shasta County unincorporated areas. The amendment then should apply to the high and very high fire hazard zones, not to the entire unincorporated area of Shasta County.

The scope switch from high and very high fire hazard zones to all of the unincorporated area of Shasta County was explained only by the relatively small portion of the unincorporated area that is considered to be a "moderate fire hazard area".

However, at the scale of the fire hazard maps, the small area of moderate fire hazard is in the neighborhood of 30,000 acres. Should this arbitrary choice to include the entire unincorporated area, dictate what can and cannot be done on those 30,000 acres?

It seems un-American to do so.

The amendment would serve appointed staff interests for expedience, perhaps. It would serve PG&E's interests to maintain their monopoly on energy, certainly.

As written, Amendment 22-0001 does not serve to allow a free market to solve energy and economic problems in Shasta County. The proposed ordinance amendment is an example of well-intentioned government workers substituting their paternalistic thinking for the principles that made our country great. This is government over-reach. And that is exactly how the future of Shasta County gets limited.

Sincerely,

MaryAnn McCrary

Redding resident & voter

MAY 9 2022

To: Shasta County Planning Commissioners
Mr. Paul Hellman, Director of Resource Management

ADMINISTRATION

From: Citizens in Opposition to the Fountain Wind Project (CIO FWP)

Subj: Zone Amendment 22-0001, Regulation of Wind Energy Systems County-Wide (Zoning Text Amendment) - Agenda Item R5, on Planning Commission Agenda for May 12th, 2022

We fully support Resolution No. 2022-014, a resolution of the Shasta County Planning Commission recommending that the Shasta County Board of Supervisors approve Zone Amendment 22-0001, regulating small and large wind energy systems. We fully support the prohibition of large wind energy systems within the unincorporated areas of Shasta County for the purpose of protecting and promoting the public health, safety, and general welfare of the residents of Shasta County.

This Commission discussed the need for zoning changes in January of 2022 and then directed Mr. Hellman's staff to put together the Resolution to present to the Supervisors for consideration. Resolution No. 2022-014 captures the items discussed and requested by the Commission. Mr. Hellman, provided all the necessary background, including CEQA law review, which supports the decision to implement the zoning changes listed within the proposed Zone Amendment 22-0001, enabling the protection of the communities across Shasta County most affected by these types of industrial developments. In addition to Mr. Hellman's Resolution 2022-014, Commissioner Kerns provided overwhelming support, via his Shasta County wildfire map, where wildfires have engulfed large areas across Shasta County. Commissioner Chapin, with decades of forestry expertise, also stated he does not believe that these types of industrial developments should be built within the forested areas. He stated these are the highest wildfire prone areas which could destroy trees and take decades or a hundred years or more to fully recover. Various experts provided overwhelming testimony, during the recent public hearings, that industrial wind turbine developments in forested areas only introduce unnecessary wildfire risk where wildfires could not be fought effectively within/surrounding the turbine fields. These expert testimonies were provided by at least 6 wildfire pilots whose careers have thousands of hours of wildfire fighting experience. One of those experts attended the Supervisor's public hearing for the Fountain Wind Appeal, while on a break from fighting the Dixie Fire, where he had also dropped retardant on the Fawn Fire.

The CIO FWP submitted 2,386 signatures to reject the Fountain Wind Industrial Development. As a point of reference the 2,386 signatures include some of the Shasta County residents from 22 unincorporated communities and three incorporated communities. We also continue to stand with over 4,000 Pit River Tribe members who presented their Resolution opposing such industrial developments. You witnessed numerous members who testified at both public hearings, stating how offensive these developments were. The spiritual native cultural impacts can only be understood by the tribal members and never captured through the CEQA or political process. The approval of Resolution No. 2022-014 support Zone Amendment 22-0001 will remove the fear and threats of future destruction, desecration, and erasing of native cultural ceremonies and scared sites for the Pit River Tribe and other surrounding Tribes.

This Commission denied the Fountain Wind Project in order to protect and promote the public health, safety, and general welfare of the community members. It has already been proven, even stated by the Fire Safety Representative from Shasta County, and addressed to Supervisor Moty, that the

preparation work and clearing for these industrial projects bring their own risk so it is as not as “clear cut” for fire safety through the environmental review process. As stated on numerous occasions, by various experts, these types of industrial developments, within the highest wildfire rated and forested areas are not acceptable.

We truly appreciate and commend your proactive efforts with these zoning amendments, just as has been done in other counties, which provide protections to the native cultural resources, environment, safety, protection, and general welfare of the community members. We believe time is of the essence since community members within the Big Bend area have stated developers continue to test the wind resources. We believe it will only be a matter of time before the County receives the next special use permit for an industrial wind development in our forested areas.

We humbly request you approve Resolution No. 2022-014, which supports the zone changes for Zone Amendment 22-001, prohibiting additional large scale industrial wind developments within Shasta County. The approval of Resolution No. 2022-014 will support the communities targeted, even for their marginal wind resources, and stop the emotional and financial trauma brought to the community members who are threatened by these industrial developments. As Commission Kerns correctly stated we were under threat for our communities, religious and cultural freedoms, livelihood, and way of life for over 2 ½ years by the Fountain Wind Project please don’t allow that to happen to again other community members within Shasta County.

Sincerely,

Beth Messick-Lattin
Chair, Citizens in Opposition
to the Fountain Wind Project

May 9th, 2022

Subj: Resolution 2022-014 for Zone Amendments 22-0001, Agenda Item R5, for 12 May 2022

Dear Planning Commissioners,

We appreciate the effort Mr. Hellman, the Planning Department Staff and the Commission (especially Commissioner Kerns) have put into the Zone Amendment 22-0001 and ask that you “yes” on Resolution No. 2022-014. We concur with the research and statements provided in the staff report for the May 12th R5 agenda item. The Zone Amendment 22-0001 rightly seeks to ban industrial scale wind energy development in the unincorporated lands of Shasta County, it further accurately defines small scale wind energy systems in County Code and clearly defines how variations to allowed small wind energy systems would be considered by the County Planning Department.

This resolution was prompted by the information that came to light as a result of recent efforts involving the Fountain Wind project. Most importantly, the growing threat of wildfires in our area and the impediment to fighting them caused by industrial scale wind energy systems. Further evidence of the growing nature of the wildfire threat was also provided by staff and Commissioner Kerns in their presentation on the number of wildfires in Shasta County in the recent past. The most recent CalFire wildfire assessment Map was also presented in which over 95% of the County was rated “High” or “Very High” Wildfire Severity Zones. These facts along with the many other unavoidable environmental impacts of these types of developments to Native American culture and sacred sites, wildlife (including birds, bats, raptors, etc.), aesthetics, and many other impacted areas, are the reason the Fountain Wind project was denied and are the same reasons why this resolution should be adopted.

Some opponents to this Resolution have advocated that Shasta County residents should sacrifice the things they hold dear about Shasta County and put our lives at risk for the sake of meeting California’s Clean Energy goals. What these advocates don’t mention or seem to care about is that Shasta County already provides many times the clean energy it consumes through various other means including hydro, solar, biomass and wind. As County staff has correctly pointed out, California is currently advocating offshore wind energy development, not further onshore development, because offshore wind is much more consistent and abundant without the many issue related to onshore developments. If producing a given amount of clean energy is truly the goal, and it isn’t primarily about the money and making billion dollar corporations even richer, then those advocating for further wind energy development in highly fire prone Shasta County should instead be advocating and lobbying for the re-powering of existing antiquated wind energy systems in Highest Wind Resource areas such as Tehachapi, Altamont Pass, and other similar areas. There are thousands of wind turbines in those areas, and many of them are dilapidated or small and antiquated. We regularly drive through those areas and have seen 50 – 60 small turbines replaced by 5 – 6 large turbines and have read reports of similar revitalizations that produce several times the power of the old systems. The only reason it isn’t happening more often is because of the money, it’s not as profitable. Instead, companies like ConnectGen and others target areas like Shasta County because that’s where the profit is – NOT because it’s any cleaner or the wind resources are any better here, in fact Shasta County has marginal winds at best. They target areas like Shasta County because they can lease the lands cheaply, zoning regulations are generally poor or don’t address industrial wind energy systems and the Counties and the people are relatively poor and can be easily bought with community enhancement funds and tax revenue. Wind Energy advocates should work with State and National legislatures to incentivize repowering efforts and making it profitable for both owners and developers, instead of breaking virgin ground and exploiting other rural areas like Shasta County.

Ms. Mudge, the attorney who claimed the resolution needed to go through CEQA, stated that the ban would preclude 2,012 MW of potential wind energy, suggesting that it was a large part of the 3,500 MW additional clean energy California wanted to produce by 2025. Ms. Mudge states in a footnote (2) of her letter that she derived that very large number from considering ALL PRIVATE unincorporated lands within Shasta County that appear to have commercially viable wind speeds per the latest California Wind Energy maps. Her statement, along with the fact that wind energy data is still being collected within the County, is just further evidence that Industrial Wind Energy developers are still targeting Shasta County and that **action needs to be taken now** to save our County from becoming another Tehachapi or Altamont Pass. The unincorporated private lands she mentions that are of most interest to Wind Energy Developers is likely the various large tract owners like Shasta Cascade Timberlands and other timber companies. The 2,012 MW of wind energy she sites in Shasta County would be nearly 10-20 additional Hatchet Ridge or Fountain Wind size of developments. Such a plan would drastically change Shasta County and cause irreparable harm to the safety, peace, morals and general welfare of County residents forever. This is all the more reason why this resolution needs to be adopted now.

We believe this Commission can take this courageous positive step to responsibly provide the protections needed to support the health, safety, convenience and general welfare of the citizens of Shasta County for generations to come by approving Resolution No. 2022-014 and supporting the Zone Amendment 22-0001. We believe this commission has the expertise and experience needed to rightly approve this resolution. You have listened to extensive testimony regarding the impact industrial wind energy systems would have on our County, you know they pose an unacceptable risk to County residents, you know they are not the right kind of project for Shasta County. You know that the financial benefits do not outweigh the negative impacts and the risk to the lives of County residents. A "Yes" vote doesn't ban clean energy, it **just** bans industrial size wind energy systems that pose a risk to our way of life and our lives themselves. Shasta County has provided well above their fair share of clean energy and can continue to do so through other clean technologies without the risk to life and property and our general welfare.

There will never be another Commission within Shasta County who has more experience than you do right now concerning industrial wind projects. You know this is the right thing to do. Please vote yes on Resolution No. 2022-014 and continue to work to advocate these Zone Amendment recommendations to the Supervisors for their approval. The time for positive change is now!

Best Regards,

Joseph and Maggie Osa

From: [Dana Silberstein](#)
To: [SCPlanning](#)
Subject: Wind Farms
Date: Tuesday, May 10, 2022 8:50:23 AM

EXTERNAL SENDER: Do not follow links or open attachments unless you recognize the sender and know the content is safe.

I am writing in opposition to a ban on wind farms. With water and power being in such peril we can no longer afford to reject genuine solutions.

We must remain open to alternative energy sources while at the same time controlling their location and aesthetic.

As much as we would like to we cannot continue relying on resources that are dwindling.

Thank you,

Dana Silberstein

From: [asolid](#)
To: [SCPlanning](#)
Subject: vote yes on Resolution No. 2022-014
Date: Thursday, May 12, 2022 6:14:43 AM

EXTERNAL SENDER: Do not follow links or open attachments unless you recognize the sender and know the content is safe.

From: [Kelly Tanner](#)
To: [Paul Hellman](#)
Subject: Comments May 12 Planning Hearing Kelly Tanner
Date: Thursday, May 12, 2022 6:49:18 AM

EXTERNAL SENDER: Do not follow links or open attachments unless you recognize the sender and know the content is safe.

Director Hellman and Commissioners-

I want to write in support of the ordinance to ban industrial turbines in Shasta County and applaud your efforts to create planning that protects communities from the risk of wildfire. As you know, I have a Masters's Degree in Disaster and Emergency Management and wrote extensively on the Fountain Fire. While some disagree about my expertise on fire, others, such as Hellman, have called me an expert on this topic.

This ordinance is not unprecedented. Los Angeles and San Bernardino Counties have passed similar ordinances. It's inappropriate that a lawyer who cannot even properly write a letter was able to use it at the last hour to stall this process simply to draw more opposition from outside groups and special interests.

This ordinance ensures the safety of this County. Why waste county money, time, and resources (or any applicants) when the end result is the same. This county is at very high risk for fire, and regardless of the project, you will put lives at risk and leave them with limited or no fire protection. This should not be acceptable in any community in Shasta County. Nor should the long drawn-out process of leaving citizens in fear of this for years.

I applaud your courage and example in leading as commissioners. Please do not let outside interest groups and foreign or out-of-state companies dictate your decision. The letter was a stall tactic. They have millions of dollars and can mobilize people easily to oppose this. Our local communities are completely unaware. Your ordinance, as written, still allows for turbines that are smaller scale and better for this County. Please pass the ordinance that you want and do not back down to these groups. Economically more industrial size projects like these will be counterproductive and unsafe, and the County will subsidize them with tax money and get none of the economic benefits developers promise these projects. Nor, will they receive the clean energy promised.

I do not have time to attach the document but please ask for it - I do have a document in my possession that the same environmental group in this County suggests this is not the type of project for this County but they have to do something rather than nothing. Remember the spotted owl.

Respectfully,
Kelly Tanner

May 11, 2022 comments for Shasta County Planning Commissioners,

The county is well aware of how I feel about wind energy. This is an industry that has time and again, deceived the citizens of Shasta County with fraudulent research, embellished energy projections and is still hiding behind nondisclosure agreements that conceal their ongoing slaughter to Shasta county's wildlife.

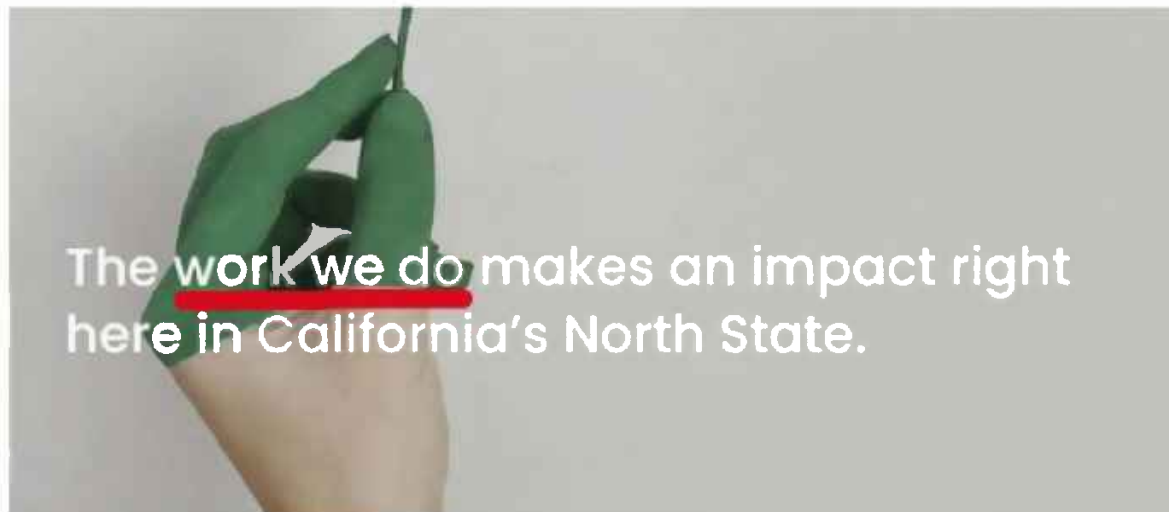
There is no reason to trust this industry, **no reason not to ban this industry in Shasta County** and in the future, no reason not to prosecute this industry. I would even help with investigations. As of May 2022, this industry has never provided a credible reason for any Shasta County commissioners to ever believe a thing they have to say.

Even so, I have resubmitted some of my thoughts with scientific facts once again in an attachment with these comments. My comments below are primarily to provide so insight into a group lurking in our midst called **North State Climate action**.

I am aware of their support of wind energy and a letter they have submitted to Shasta County.



[Home](#) [Our Work](#) |



What is the work this group really does?

This group appears to be just one more lockstep Wind industry mouthpiece. They make proclamations about helping climate without providing a shred of scientific evidence for their support of wind energy. They do not reveal if they have any **conflicts of interest, no credentials are given and nothing is said about their donors**. They're also promoting wind energy's wildly fraudulent claims about their energy contribution to the grid.

And by the way I happen to have plenty of wildlife expertise, decades of field research and no conflicts of interest.

As far as I'm concerned, the work of this group is to use fatally flawed research, loaded with conflicts of interest to spread falsehoods that benefit both the group financially and wind energy interests. Lobbying their interests to Shasta County does not make their mission truthful and remember, they have provided no research of their own.

Audubon (see images below) and ABC birds both sold out to wind energy years ago and have been operating the same way for years. They receive wind energy related funding, have hundreds of millions in assets, yet will not conduct a bit of independent research regarding the hidden and horrific impacts from wind energy developments. With their silence they are also lying by omission. I could write pages about these groups and the discussions I've had with their leaders.

North State Climate Plea

To reduce our contributions to the heat, drought, and fires on the rise in the North State:

We call on our civic and business leaders, as well as all community members, to do what they can to reduce the use of fossil fuels. Fossil fuel use is the main contributor to climate change, which in the North State we are experiencing as increasing heat, drought, and fire.

City of Redding

- REU should vigorously pursue adding more clean energy into its mix. The city's energy is now 25% wind, but less than 1% solar.

Not even close to being true

Gavin Newsom, California's Governor, isn't ready to tell California residents the truth, but here's what's coming, lots more nuclear power.

California's future.....

Postponing Diablo Canyon's closure could make sense — but the devil is in the details

CT 11 - 12:07 PM LUTHER J. CARO

APR 11, 2022 10:05 AM



Gov. Gavin Newsom has shifted his position on Diablo Canyon, California's last nuclear power plant, and now plans to apply for federal funds to keep it open. johnston@tributenews.com

The reason, after 40 years of trying, the massive fraud and green lies about wind energy powering the future are coming to an end and without using Green's energy's fraudulent math and omissions, CA's fleet of turbines might be producing a pitiful net of only 2% for the grid.

Currently California is using nuclear power generated from Arizona, but our Faux green state doesn't like to broadcast this reality.

In the near future, California's growing energy needs will have to include more nuclear power and lots of it for electric cars. The Green math hucksters won't disclose this, but with each new electric car purchased, wind power's contribution to the grid just keeps on plummeting.

Turbine Fires will happen

I don't see them all, but here is a new one sent to me from Garner, Iowa, April 22 2022.



National Audubon settlement letter showing the day Audubon sold out to the Wind Industry. From this day forward, I encourage Shasta County Commissioners or Supervisors to look for find a single

negative, meaningful or truthful statement about wind energy coming from this group.

National Audubon Society



1901 Pennsylvania Avenue
Suite 1100
Washington, DC 20006-3
(202) 861-2242
(202) 861-4290 fax

November 2, 1999

Mr. Robert Gates, President
Enron Wind Development Corporation
13000 Jameson Road
Tehachapi, California 93561

Dear Mr. Gates:

It is my understanding that Enron Wind Development Corporation, Tejon Ranch Company, and several other parties have reached an agreement concerning a proposed wind energy development project near Gorman, California. As you know, the National Audubon Society has opposed development of this site because of the potential impact it could have on California Condors.

According to the information we have been provided, Enron Wind Development has taken steps to permanently insure that the Gorman site will not be developed for wind energy, and has agreed with Tejon Ranch to develop another site in the area which does not pose a threat to condors.

I want to take this opportunity to congratulate you and your company for your leadership in working to resolve this very difficult issue. Your firm has a well-deserved reputation as an environmental leader in providing power through wind energy and your decision to seek an alternative to the Gorman site is to be applauded. Your agreement has set a new standard for prompt and responsible action to provide clean, renewable energy in a manner that does not pose a risk to the California Condor.

Given the agreements Enron Wind Development, Tejon Ranch and the other parties have reached, I'm writing to inform you about the steps the National Audubon Society will now take in this matter:

1. We will terminate our campaign to oppose the wind energy development project at the Gorman site.
2. We will inform members of the House of Representatives and Senate that legislation to deny the wind power production tax credit to the Gorman site through the addition of the Audubon amendment to the production tax credit is unnecessary and we do not recommend its passage. We will also inform them that Audubon supports reauthorization of the production tax credit legislation. This information will be communicated in a letter from me to each member; a draft

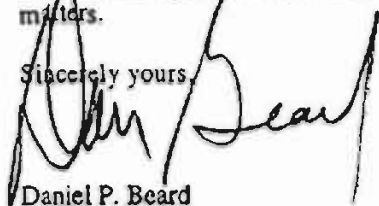
Mr. Robert Gates
November 2, 1999
Page 2

copy of the letter is attached. I will also send letters to the members on the attached list by the close of business November 3, 1999.

3. We will join you and the other parties in issuing the attached press release to inform the media and the public that the issues surrounding the proposed Gorman project have been resolved satisfactorily.
4. We will place the attached ads in congressional newspapers supporting the production tax credit legislation, assuming the funds to pay for these ads can be provided from other sources.
5. We will support your wind energy development project to be located at Section 21, Township 10 North, Range 15 West, San Bernardino Base and Meridian which the U.S. Fish and Wildlife Service has determined does not adversely affect recovery of the California Condor.

Once again, I want to thank you and your staff for their leadership in resolving this matter. I especially want to express my appreciation to Mr. Al Davies of your staff who worked very hard to make this agreement a reality. We look forward to working with you on this and other matters.

Sincerely yours,



Daniel P. Beard
Senior Vice President -- Public Policy


Accepted and Approved


11/8/99
Date

Shasta county should permanetly ban these projects. They are highly destructive, need fraud or nondisclosures agreements to survive, are a danger to rural residents, an incredible drain of tax dollars and provide very little benefit to society.

I would be happy to discuss any of this with North State Climate Action, in front of commissioners, but only if I am allowed to ask questions.

Jim Wiegand - Wildlife Biologist, Lakehead CA 530 2225338

From: Nancy Rader <nrader@calwea.org>
To: Paul Hellman; Stefany Blankenship; Adam Pressman
Sent: 4/14/2022 10:16:20 AM
Subject: Comment Letter on Today's Planning Commission Agenda Item R3
Importance: High
Attachments: CalWEA_Letter_to_Shasta_County_re_Wind_Moratorium_(4-14-22).pdf

 **EXTERNAL SENDER:** Do not follow links or open attachments unless you recognize the sender and know the content is safe.

Dear Shasta County,

Please find attached CalWEA's comments on Agenda Item R3 of today's Planning Commission meeting.

Thank you,

Nancy Rader
Executive Director
California Wind Energy Association

1700 Shattuck Avenue, #17

Berkeley CA 94709

Office: (510) 845-5077 x1

Mobile: (510) 919-6358

nrader@calwea.org

www.calwea.org

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California Wind Energy Association

April 14, 2022

Shasta County Planning Commission
1855 Placer St Suite 103
Redding, CA 96001

Via email

Re: Proposed Prohibition of Large Wind Energy Systems

Dear Chair and Members of the Planning Commission:

The California Wind Energy Association (CalWEA)¹ writes with alarm regarding the proposed amendments to Shasta County's zoning code (Zone Amendment 22-0001) that are before you today. If approved, these amendments would prohibit large wind energy systems in almost all areas of unincorporated Shasta County where they are currently conditionally allowed.

CalWEA urges the Planning Commission to reject the proposed amendments outright. At a minimum, the County must prepare an environmental analysis in compliance with the California Environmental Quality Act (CEQA) before considering such amendments.

Wind energy will play a critical role in meeting California's climate change mitigation goals aimed at the root cause of the drought and wildfires that are wreaking havoc in California. A study performed for the California Energy Commission looking at means of achieving California's energy-decarbonization goal² shows that dramatic growth in wind energy will be required to achieve that goal most affordably while ensuring the reliability of the grid.³ The California Public Utilities Commission's resource plan includes over 3,500 megawatts

¹ CalWEA is a 20-year-old trade association representing wind energy and related companies focused on the California market, primarily including owners, operators and developers of wind energy projects located in California and in waters off the California coast.

² SB 100, signed into law in September 2018, establishes as state policy that zero-carbon resources are to supply 100% of California retail sales by December 31, 2045.

³ California Energy Commission, "Deep Decarbonization in a High Renewables Future," at Figure 14. CEC-500-2018-012. June 2018. (Available at: <https://www.energy.ca.gov/2018publications/CEC-500-2018-012/CEC-500-2018-012.pdf>.) This study shows that, absent a large amount of wind energy from within or outside of the state to balance solar resources, decarbonization will come at an added cost of nearly \$20 billion per year. Also see

(MW) of additional wind energy delivered to the Cal-ISO grid by 2025,⁴ a 60 percent increase in the amount of wind energy generation currently operating in California. Realizing the state's clean energy goals, of which in-state wind energy is a critical component, will require counties to recognize, in their planning and permitting decisions, that wind energy projects must be part of the solution to the most pressing environmental problem of our time.

Shasta County's professional planning staff have previously found that two properly designed large wind energy projects are compatible with high-fire-risk lands and are not detrimental to health, safety, and general welfare of neighboring persons. The Hatchett Ridge wind project has been safely operating for over 10 years. At the same time, wind energy projects bring important economic benefits to local communities, including jobs and tax base.

For these reasons, CalWEA urges the Commission to reject the proposed amendments. At a minimum, as explained in a letter submitted to the Commission on this matter by Cox Castle & Nicholson LLP (dated April 13, 2022), the County must prepare environmental review documents in compliance with CEQA before considering this proposal. The collateral impacts on the environment from the proposed amendments could include failure to achieve California's climate change mitigation plans.

Sincerely,



Nancy Rader
Executive Director

⁴ California Public Utilities Commission Decision 22-02-004 at Table 5 (February 10, 2022).

From: SCPlanning </o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=4bc821c879454f86bcbf5881f92638ab-scplanning>
To: Paul Hellman
Sent: 4/13/2022 12:43:37 PM
Subject: FW: Please read these comments before 4.14 meeting
Attachments: planning comission meeting 4.14.pdf

Tracie Huff

Administrative Secretary I
Planning Division
Shasta County Resource Management
1855 Placer Street STE 103
Redding CA 96001
(530) 225-5532 Phone
(530) 245-6468 Fax
resourcemanagement@co.shasta.ca.us



From: Jim@JimWiegand.com <Jim@JimWiegand.com>
Sent: April 13, 2022 12:42 PM
To: SCPlanning <scplanning@co.shasta.ca.us>
Subject: Please read these comments before 4.14 meeting

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Comments for Planning Commission regarding the prohibition of large wind energy systems within the unincorporated area of Shasta County

I think it's a fantastic idea to prohibit large wind energy systems in Shasta County because these countryside monsters do catch fire on a regular basis. This is a real ongoing threat for all of Shasta County. At some point, it is likely that one of the Hatchet Ridge wind turbines will catch fire, so I hope fire crews will be able to minimize the damage.

People across the world send me videos of turbine fires several times a year. This link shows a recent one.

<https://www.facebook.com/richard.major1/videos/10110297277215878>

But besides the wildfire dangers from wind turbines and infrastructure, there are other very good reasons to forever ban these systems in Shasta County. This industry and our government agencies lie about nearly everything with these energy systems and it's at the expense of the public. Below is new factual information I have put together for Shasta County that I want to be part of the official record.

The Interior Department's New Bald Eagle Take Numbers

America's green energy fraud has been going on for decades and as I have discovered, it never sleeps.

The Interior Department, with fraudulent research and has announced new imaginary bald eagle population estimates of about 317,000 bald eagles, New limits on the number of bald eagles that can be killed by industry each year have been increased to [15,832](#). The previous take limit, also created with fraudulent research, was set in 2016, at [4200 bald eagles](#) annually.

From [Federal Register](#)"Although some of the increase in the estimates of population size from 2009 to 2019 can be attributed to improvements in methods, the majority of the increase is likely due to population growth, estimated to be around 10 percent per year."

Improvements in "methods" really means, continue to ignore real world conditions dismiss the bald eagle habitat abandonment near wind farms like Hatchet Ridge and crank up the rigging for investors.

Not sure if the Interior Departments new eagle population estimates include Alaska or not but the population of [Alaska's bald eagles](#) is about 30,000. Alaska by leaps and bounds, has more bald eagles than any other state. Subtract that number from 316,708 and we are supposed to believe that on average, each of the lower 48 states has a population average of 5,971 bald eagles. In California the bald eagle population doesn't even come close and we might have 1/3 this number, but no more.

Here in Shasta County, CA, we easily have the highest density of bald eagles in the state and the total population including juveniles is about 150. Except for occasional migrants, many of California's 58 counties don't even have bald eagles. My Estimate is that there could be 1500 bald eagles living in CA.

As for Having 5791 bald eagles living in Ca, at some point it could be possible but the turbines killing them off in at Altamont and in the Delta region, would have to be destroyed. As for each of the lower 48 states having an average population of 5,971 bald eagles, it's not possible and in fact, the state of Alaska is the only state with this number of bald eagles.

The Interior Department has lied about the bald eagle population for 48 out of the 49 states with bald eagles. Keep in mind, they also produced a [fake study](#) that overestimated a golden eagle population in central CA by over 10 times.

Green Energy's Hidden Eagle Slaughter

Recently an American wind energy company pleaded guilty to federal criminal charges after at least 150 eagles were killed since 2012. The company has agreed to spend as much as \$27 million on efforts to prevent more deaths.

The company has agreed to spend up to 27 million to prevent more deaths. What good is this? Except for shutting down turbines, there is no way to prevent eagle deaths from wind energy. This industry and the USFWS are very aware of this because wind turbines have been annihilating eagles for decades.

The truth is, these 150 dead eagles are only the tip of the iceberg and very likely represent less than 1% of this ongoing carnage. Back in 1997, when California was the only state with wind turbines in eagle habitat, the Denver Eagle Repository, reported wind turbines being one of their primary sources for their yearly 800 eagle carcasses. When compared to 1997, America now has 80 times more installed wind energy than it did back then 1997. Today, based upon Repository records released up to 2014, the Denver Repository now receives over 3000 eagle carcasses a year.

But with this green energy expansion came a new era of wind turbines. These new turbines invading eagle habitats, were also far more deadly. Early turbines had blade tip speeds that were 110-120 mph while tip speeds for new turbines have speeds twice as fast.

Why doesn't the public know about any of this?

- 1) Wind energy mortality disclosures are not required, scientific research is not required and all wind industry mortality research being conducted, is being staged.
- 2) In 1997, the Clinton Administration created new laws so this ongoing slaughter could be conveniently considered, a business trade secret.
- 3) In 1997, The Freedom of information Act was changed to protect this industry.

4) In 1997, Interior Department personnel were silenced and their employment required non-disclosure agreements with very strict penalties.

5) In 1997, the Denver Eagle Repository was silenced and no longer allowed to discuss the origin of their eagle carcasses.

6) Leaseholders in partnership with wind energy developers are also required to sign very strict non-disclosure agreements. These leaseholders are never allowed to discuss species mortality taking place from the wind turbines on their property. They're also required to immediately dispose of carcasses. Even with post construction mortality research, access by leaseholders and wind energy employees has never been restricted during studies.

6.2.5 Disposal of Animal Carcasses. Owner agrees to take all reasonable measures to avoid attracting scavenging birds and other animals by ensuring all animal carcasses on the Property are immediately (to the extent permitted by applicable law) burned, buried, adequately and completely composted by covering with an adequate amount of earth or mulch, cooked or placed in enclosed containers with lids if such carcasses will be removed at a later time from the Property. Animal carcasses shall not be left in open fields or adjacent to buildings and shall not be left uncovered or exposed.

Since 1997, nobody involved with wind energy and its eagle carcasses, has been allowed to disclose the truth.

Dead Eagle numbers

The Interior Department and USFWS claim that they keep no records for the origin of these eagle carcasses.

An Email I received from USFWS agent Jill Birchell in 2016, confirmed this government protocol of secrecy.

"Hi Jim,

I checked with our repository and learned that they don't keep detailed records of where the eagles they receive come from."

Up to the year 2014, the Repository did report eagle carcasses being received and processed. For 2014 they reported receiving 2309 eagle carcasses for dispersal to American Indians and noted others that had not been counted, which would likely bring totals to about 2400. Since 2014 the numbers of eagle carcasses being processed for the Native Americans is no longer being given out.

NATIONAL EAGLE REPOSITORY ANNUAL REPORT: 10/01/13 – 09/30/14						
REGION	WHOLE EAGLES AND EAGLE PARTS RECEIVED		WHOLE EAGLE ORDERS FILLED	EAGLE FEATHER & PARTS ORDERS FILLED	COMBINED FILLED ORDERS BY REGION	
		REGION TOTAL	BALD/GOLDEN	BALD/GOLDEN		
1		239	135	376		511
2		65	479	1,113		1,592
3	Iowa Region	591	129	357		486
4		352	24	114		138
5		229	24	110		134
6		492	170	519		689
7		216	3	13		16
8		125	62	240		302
TOTAL		2,309	1,026	2,842		3,868
NEW REQUESTS RECEIVED						
	BALD EAGLES	1,176	LAST REPOSITORY Report Published			
	GOLDEN EAGLES	1,795				
	EITHER SPECIES	1,379				
	TOTAL	4,350				
NOTES: The incoming bird count is not complete as we are still evaluating birds received in September. The final total number of birds and bird parts received will probably be about 2,400. The total number of eagles and parts shipped, as well as the number of new requests received are complete as of 10/22/14. 2842 "parts" orders due to more eagles hit by turbines now being found more mutilated						

But this eagle carcass story doesn't end with just Repository Eagles being processed for American Indians. There are many other carcasses because "clean" eagles are required for ceremonies; eagles that have died as a result of electrocution, vehicle collision, unlawful shooting or trapping, poisoning or from natural causes are unacceptable for ceremonial sacrifice.

In 2014 NBC did a story on the Denver Repository 2014. In this story about recycling eagles to American Indians, the repository reported that they had processed about 42,000 eagle carcasses. This Interior Department facility was opened in 1995.

<https://www.nbcwashington.com/news/local/protecting-eagles-in-life-and-death/1985909/>

In the interview discussing Wildlife Repository Specialist Dennis Wiist, this was revealed ... "But at last count, almost 42,000, he's touched nearly every eagle that's come through this facility."

Add another 8 years of receiving 2500-3000 eagles and about anyone past the eighth grade can come up with an estimate of over 60,000 eagle carcasses since 1995. It's hard to imagine and even harder to stomach, but over 60,000 eagle carcasses have secretly shipped to this repository, with no cause of death or origin given. When Shasta County approved the Hatchet Ridge wind project, this county became a part of this green fraud on America.

If federal prosecutors really wanted prosecute green energy's eagle kills

Even though the USFWS won't report the carcasses it would still be fairly easy to prove what's taking place with America's hidden eagle carnage through indirect means. Sort of like using cell phone tracking data to convict a murderer.

The prosecution of 150 eagles killed since 2012 is nothing to get excited about when nothing has been done about tens of thousands of other eagles killed by wind energy. America's silenced USFWS agents know exactly what's taking place because they process and arrange FedEx overnight shipping for nearly all the eagle carcasses shipped to the Denver Eagle Repository.

If federal prosecutors wanted the truth, a look into FedEx records would give investigators a very good idea what's taken place. From FedEx they would know the origin of shipments, they would see the proof of millions paid out by the US government for overnight shipping and the weight of crates would indicate the number of eagles per shipment. Surveillance on the Repository site in Denver would also clue investigators in on the number of Fed Ex shipments coming in per week.

Another way for prosecutors to get to the truth about green energy's eagle carnage, they could start interviewing leaseholders. I know of one case (have documents) where a dead bald eagle was found near a turbine and it was reported by someone that hadn't signed a lease. When agents arrived at the property, the eagle was nowhere to be seen because the leaseholder had already disposed of it.

At some point, if a Shasta County prosecutor wanted to do something similar with Hatchet Ridge, I could help them with a few other ideas.

Wind energy calculations that show 4-5 times less turbine energy actually being produced for the grid

Recently I looked into Wind energy's contribution to an isolated energy grid in Nome, Alaska then compared it to Iowa's glowing Wind energy production numbers.

As I discovered, green energy calculations have very little to do with reality. But by using "Green" energy math methodology and with the help from our politicians, Iowa is able to make claims about producing almost 60% of Iowa's electrical energy from wind.

It's not true, and an analysis of the grid in Nome, Alaska explains why.

11,660 megawatts

Iowa's wind generation capacity of **11,660 megawatts** in 2020 provided just shy of 60% of the state's electricity last year. EC highlighted the need to reach 11,000 megawatts of wind capacity by 2032 to stay on track for a 2050 goal of 100% renewable energy in our publication Iowa's Road to 100% (April 30, 2021).

<https://www.iainvironment.org/newsroom/energy-news>

[Iowa Nears 60% Wind Energy Generation Milestone - Iowa ...](#)

About featured snippets • Feedback

This report from Alaska is extremely interesting because Nome Alaska has a completely isolated electrical grid. In order to survive, the people of Nome have to depend on diesel generators and an intermittent supply of wind energy. By the way, the winds around Nome are considered prime for wind power generation.

ACEP Technical Report

Nome Wind-Diesel System Overview

Chris Pike and Nathan Green

DRAFT Report – November 1, 2017

A report for the Alaska Energy Authority as part of the Renewable Energy Fund
Data Collection and Analysis Effort

Nome, Alaska

Nome has two Wärtsilä 5.4 MW diesel generators, which alternate to supply power. A 3.6 MW Caterpillar generator is used during the off-peak summer hours when demand is low; a 1.8 MW Caterpillar generator is used to augment peak loads during winter afternoons. A 0.4 MW diesel generator is used as a black start unit in case of a black out and can support lower temporary peaking requirements.

Presently, NJUS operates one of the most efficient diesel powerhouses in Alaska, with an average kWh/gal of 15.8 for the period of July 2015 through June 2016, according to power cost equalization (PCE) records.

Initially the Nome wind project consisted of eighteen 50 kW Entegritty turbines. After the full value of the tax credits was realized by Banner Wind LLC, the company sold the Banner Wind project to NJUS along with the long-term lease for the land, effective January 2015. In 2013, two additional 900 kW wind turbines were installed by the utility, using millions in funds from the Alaska Renewable Energy Fund program and a contribution from the local fishing community development quota program, Norton Sound Economic Development Corporation.

Today all of Nome's smaller Entegritty turbines have been shut down due to grid inefficiency and high costs. The project lasted about 10 years but the two larger .9 MW turbines still remain.

Nome Joint Utility System (NJUS) Assistant Manager Ken Morton:

"The cost to maintain the smaller units has increased to the point that the cost of the diesel fuel they displace no longer pencils out."

"NJUS does not at this time have plans to replace the turbines or add additional ones. However, if grant funding becomes available for additional turbines, as well as funds for a battery system that would allow for greater reliance on wind energy, NJUS would pursue that."

In 2021 the Nome Joint Utility System allocated funds to have all their [original 18 turbines](#) to be taken down.

Iowa Wind

So, what does all this have to do with Iowa?

Nome used real world numbers to determine the value and contribution from wind energy for their customers. A 2017 report (see image) said the [actual contribution](#) ("penetration") to Nome's grid in 2015, averaged out to a pitiful 6.3% (see image).

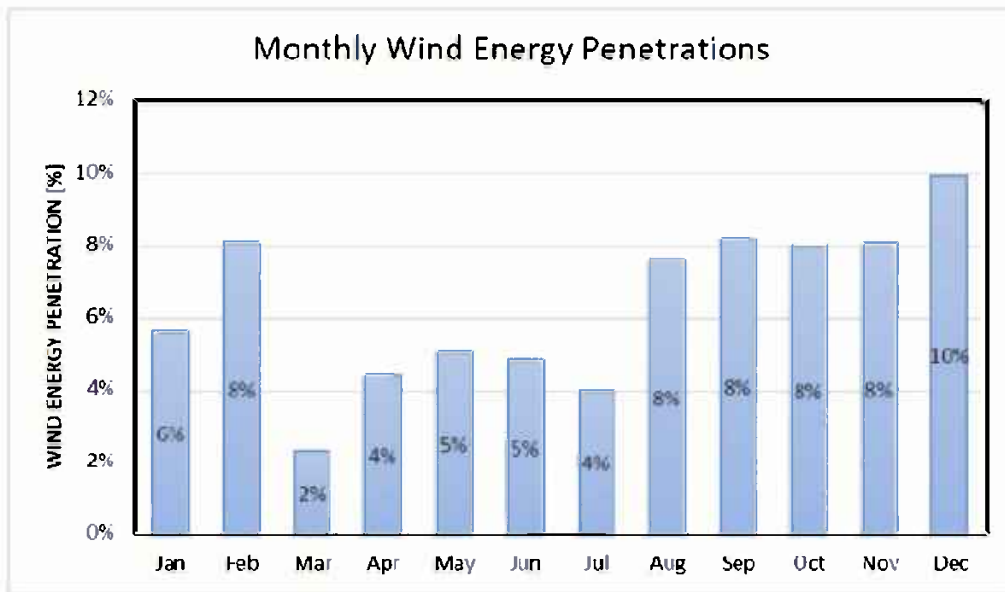


Figure 13. Wind energy penetration by month. To arrive at these figures, the total wind energy fed to the grid each month is divided by the total energy generation each month from all generation sources.

6.3 % yearly average

These are grid numbers and calculations never disclosed from America's other 49 states. The primary reason, Nome's utility district is trying to survive as efficiently as possible while developers and utilities in the other states are busy soaking taxpayers.

Nome Alaska 2015 electric profile

Wind 2.7 MW percentage of nameplate capacity 33%

Diesel 5.4 MW percentage of nameplate capacity 66%

Total 8.1 Wind energy's annual contribution to Nome grid 6.3%

With their baseload diesel generators compared to installed the wind energy nameplate capacity, Nome had an installed diesel to wind 2 to 1.

Iowa's 2020 electric profile

Wind 11,322.5 MW percentage of nameplate capacity 50%

Coal and other sources 11,147.9 MW percentage of nameplate capacity 50%

Total nameplate capacity 22470.4 MW

[Iowa](#) has an installed capacity ratio of about 1 to 1 when their baseload energy sources are compared to installed nameplate wind capacity. Iowa does have a greater

percentage of installed wind capacity than Nome. But if we double Nome's wind energy capacity to equal Iowa's 50% wind mix, the annual contribution Nome's utility would still only achieve about a 12.6% contribution to their grid from wind.

When compared to Nome, Iowa has far more energy transmission losses for wind energy because consumers in Nome are located only 4.5 miles from their wind farm. But assuming all things being equal, including annual wind speeds, Using the same the wind mix/grid penetration calculations from Nome, means that all of Iowa's thousands of turbines, still only contribute about 12-13% of the Iowa's usable energy to the grid.

In a previous post, I said Iowa, grid requirements need constant [base loads](#) of 3000 – 4500 MW. These were old very conservative numbers taken from an Iowa energy site. Today's Iowa's average base load requirements from coal and sources besides wind, are very likely 6500-7000 MW or about 60,000,000 MWh per year.

These energy numbers for Iowa's grid are real and are nowhere to be seen with wind energy reporting. It sure appears that Iowa is using fraudulent wind energy estimates to collect an abundance of Production Tax Credits along with selling regular energy created in fossil fuel plants, as being green.

Iowa's true wind energy value to customers is likely being deliberately overstated between four and five times. The same holds true for every bit of the [EIA](#) wind energy data posted for CA and all other states as well.

In conclusion, this is truly a horrendous industry and the approval of Hatchet Ridge was a monumental mistake by Shasta County Supervisors. For the good of this county, let's hope that Hatchet Ridge is the last wind project to ever be approved in Shasta County.

Jim Wiegand - Lakehead CA

•

Additional supporting images shown below:

Iowa Electric Profile (2020 - Including Non-Utility Generation)

ELECTRIC GENERATION IN IOWA BY PRIMARY ENERGY SOURCE	2020 NAMEPLATE CAPACITY (MW)¹	PERCENT OF NAMEPLATE CAPACITY	2020 GENERATION (MWH)²	PERCENT OF GENERATION
Coal	5,754.7	25.61%	14,146,835	23.72%
Wind	11,406.9	50.76%	34,182,302	57.32%
Nuclear	0.0	0.0%	2,904,863	4.87%
Natural Gas	4,215.0	18.76%	7,036,824	11.80%
Hydro	129.2	0.58%	1,025,215	1.72%
Other & Other Renewables	22.0	0.10%	207,440	0.35%
Petroleum	924.2	4.11%	111,111	0.19%
Solar	18.4	0.08%	22,082	0.04%
Total	22,470.4	100.00%³	59,636,672	100.00%³

1	Table 4. Electric power industry capacity by primary energy source, 1990 through 2020						
2	Iowa						
3	megawatts						
4		Year 2020	Year 2019	Year 2018	Year 2017	Year 2016	Year 2015
39	Total electric industry	21,333.2	20,409.5	18,842.2	17,670.8	17,045.5	16,8
40	Battery	1.4	1.1	1.1	-	-	-
41	Coal	5,284.0	5,343.8	5,371.7	5,497.9	5,548.8	6,2
42	Hydroelectric	150.4	146.4	146.4	146.4	144.9	1
43	Natural gas	3,694.7	3,647.1	3,580.7	3,571.1	2,931.8	2,6
44	Natural gas - CC	1,816.2	1,829.0	1,779.8	1,772.6	1,121.1	1.1
45	Natural gas - GT	1,228.4	1,226.8	1,260.4	1,265.7	1,140.3	1.1
46	Natural gas - IC	106.5	96.4	97.2	91.4	92.4	-
47	Natural gas - ST	543.6	494.9	443.3	441.4	578.0	3
48	Nuclear	-	601.4	601.4	601.4	601.4	6
49	Other	-	-	-	-	-	-
50	Other biomass	20.6	20.6	21.4	21.4	21.4	-
51	Petroleum	841.6	851.7	854.0	852.7	1,022.9	1,0
52	Petroleum - GT	204.1	205.3	201.5	202.1	385.9	4
53	Petroleum - IC	605.5	614.4	613.0	618.6	605.0	6
54	Petroleum - ST	32.0	32.0	39.5	32.0	32.0	-
55	Solar	18.0	13.4	8.9	7.7	2.6	-
56	Solar- PV	18.0	13.4	8.9	7.7	2.6	-
57	Wind	11,322.6	9,784.0	8,256.6	6,972.2	6,771.7	6,1
Other biomass includes agricultural byproducts, landfill gas, biogenic municipal solid waste, other biomass (solid, liquid and gas) and sludge w							
Other gases includes blast furnace gas, and other manufactured and waste gases derived from fossil fuels.							
Other includes non-biogenic municipal solid waste, batteries, chemicals, hydrogen, pitch, purchased steam, sulfur, tire-derived fuels, waste							
58	Source: U.S. Energy Information Administration, Form EIA-860, Annual Electric Generator Report.						
59							
<div><div>►</div><div>1. Summary</div><div>2A. Plants-Capacity</div><div>2B. Plants-Generation</div><div>3 Retailers</div><div>4. Capacity</div><div>5</div></div>							

Fake numbers

Table 5. Electric power industry generation by primary energy source, 1990 through 2020

Iowa					
megawatthours					
Total electric industry	59,636,671	61,673,544	63,380,569	57,909,568	54,395,000
Battery	-60	-94	0	-	-
Coal	14,146,835	22,159,203	28,552,999	25,358,230	25,150,000
Hydroelectric	1,025,215	796,268	924,861	1,033,940	910,000
Natural gas	7,036,824	7,684,253	7,340,070	4,567,447	2,960,000
..Natural gas - CC	5,971,857	6,892,269	6,409,135	3,746,433	2,410,000
..Natural gas - GT	479,512	386,174	518,450	343,837	190,000
..Natural gas - IC	2,769	10,192	3,200	12,169	-
..Natural gas - ST	582,687	395,617	409,286	465,008	340,000
Nuclear	2,904,863	5,235,716	4,895,399	5,213,509	4,700,000
Other	0	0	0	2,382	1,000
Other biomass	199,395	203,122	209,177	207,859	250,000
Petroleum	111,111	238,192	110,565	146,719	210,000
..Petroleum - GT	671	101,527	3,049	25,607	40,000
..Petroleum - IC	7,744	9,853	7,610	24,555	10,000
..Petroleum - OTH	24	67	300	0	-
..Petroleum - ST	102,672	126,745	99,606	96,558	90,000
Solar	22,082	15,436	11,456	4,838	-
..Solar- PV	22,082	15,436	11,456	4,838	-
Wind	34,182,302	25,328,971	21,334,057	21,372,752	20,000,000
Wood	8,105	12,478	1,986	1,890	-

Other biomass includes agricultural byproducts, landfill gas, biogenic municipal solid waste, other biomass (solid, liquid and gas) and Other gases includes blast furnace gas, and other manufactured and waste gases derived from fossil fuels.

Other includes non-biogenic municipal solid waste, batteries, chemicals, hydrogen, pitch, purchased steam, sulfur, tire-derived fuels

Note: Totals may not equal sum of components because of independent rounding.

Source: U.S. Energy Information Administration, Form EIA-923, Power Plant Operations Report and predecessor forms.



From: Paul Hellman </O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS /CN=6BBE491255E64F6BB3EEDE982B69B773-PAUL HELLMA>
To: Paul Hellman
CC: James Ross; Adam Pressman; Adam Fieseler
BCC: Tim MacLean; Tim MacLean; Donn Walgamuth; patrick@wallnerplumbing.com; Jim Chapin; skerns7118@aol.com
Sent: 4/12/2022 3:14:32 PM
Subject: FW: Wind farms


Commissioners,

The following e-mail regarding the proposed wind energy systems ordinance (Zone Amendment 22-0001) was received this morning.

Thanks,
Paul Hellman, Director
Shasta County Department of Resource Management
(530) 225-5114
<https://www.co.shasta.ca.us/index/drm>

-----Original Message-----

From: Jeen Wopat <lwopat@hotmail.com>
Sent: April 12, 2022 9:36 AM
To: SCPlanning <scplanning@co.shasta.ca.us>
Subject: Wind farms

 **EXTERNAL SENDER:** Do not follow links or open attachments unless you recognize the sender and know the content is safe.

April 12, 2022

Greetings Shasta County Planning Commissioners,

We request that you NOT support a blanket wind farm prohibition! We prefer that you evaluate each wind farm proposal based on its individual merits.

We appreciate that a blanket prohibition would be perhaps handy from a legislative perspective and administratively save some public dollars, but it would in no way serve our greater need of addressing clean energy challenges as we continue to find our way in an ever-changing climate threat.

Sincerely,
Michael and Linda Wopat
Shasta County residents, homeowners,
and voters


Sent from my iPhone

From: SCPlanning </o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=4bc821c879454f86bcbf5881f92638ab-scplanning>
To: Paul Hellman
Sent: 4/12/2022 10:01:48 AM
Subject: FW: Wind farms

Tracie Huff
Administrative Secretary I
Planning Division
Shasta County Resource Management
1855 Placer Street STE 103
Redding CA 96001
(530) 225-5532 Phone
(530) 245-6468 Fax
resourcemanagement@co.shasta.ca.us

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Sent: April 12, 2022 9:36 AM
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Sincerely,
Michael and Linda Wopat
Shasta County residents, homeowners,
and voters

Sent from my iPhone


From: SCPlanning </o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=4bc821c879454f86bcbf5881f92638ab-scplanning>
To: Paul Hellman
Sent: 4/14/2022 11:51:49 AM
Subject: FW: Wind Farms

Tracie Huff

Administrative Secretary I
Planning Division
Shasta County Resource Management
1855 Placer Street STE 103
Redding CA 96001
(530) 225-5532 Phone
(530) 245-6468 Fax
resourcemanagement@co.shasta.ca.us



From: Warren Swanson <warrenswanson@gmail.com>
Sent: April 14, 2022 10:19 AM
To: SCPlanning <scplanning@co.shasta.ca.us>
Subject: Wind Farms

 **EXTERNAL SENDER:** Do not follow links or open attachments unless you recognize the sender and know the content is safe.

Planning Commissioners,

I'd like to make a comment on the proposal to ban all windmills from Shasta County. This is a deeply flawed and regressive idea. Shasta County has already received copious amounts of negative press around the country (New York Times, LA Times, SF Chronicle) about our fringe right wing groups. We don't need more articles painting us as a joke hick town (we are not).

Climate change is real and happening faster than predicted. We need all hands on deck to slow it down and wind power is one way to do that.

Please do the right thing and reject this ridiculous proposal.

Warren Swanson


3299 Woodbury Dr, Redding, CA 96002
223-4959

From: SCPlanning </o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=4bc821c879454f86bcbf5881f92638ab-scplanning>
To: Paul Hellman
Sent: 4/14/2022 7:54:42 AM
Subject: FW: Zone Amendment 22-0001

Tracie Huff
Administrative Secretary I
Planning Division
Shasta County Resource Management
1855 Placer Street STE 103
Redding CA 96001
(530) 225-5532 Phone
(530) 245-6468 Fax
resourcemanagement@co.shasta.ca.us

-----Original Message-----

From: MaryAnn M <mamcfree@gmail.com>
Sent: April 13, 2022 5:13 PM
To: SCPlanning <scplanning@co.shasta.ca.us>
Subject: Zone Amendment 22-0001

 **EXTERNAL SENDER:** Do not follow links or open attachments unless you recognize the sender and know the content is safe.

Shasta County Planning Commissioners: As a citizen of Shasta County since 2005, I am concerned that the proposed Zone Amendment 22-0001 regarding regulation of Wind Energy Systems County-Wide is overly broad and restrictive. There are large areas in Shasta County that are not in a high fire hazard zone. In these areas the most crucial objections to the Fountain Wind Project would have been moot. Also, mitigations for the impacts of wind farms are improving. We do need to reduce our reliance on fossil fuels, that have many negative impacts on the environment and our climate. Please do not commit the error of government over-reach in a County that is predominantly anti-Govenent already. Thank you.

Sincerely,
MaryAnn McCrary
5136 Bidwell Road
Redding, CA. 96001

From: SCPlanning </o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=4bc821c879454f86bcbf5881f92638ab-scplanning>
To: Paul Hellman
Sent: 4/13/2022 8:01:43 AM
Subject: FW: Zone Amendment 22-0001 Comment

Tracie Huff

Administrative Secretary I
Planning Division
Shasta County Resource Management
1855 Placer Street STE 103
Redding CA 96001
(530) 225-5532 Phone
(530) 245-6468 Fax
resourcemanagement@co.shasta.ca.us



From: Doug Mandel <skagit3@gmail.com>
Sent: April 12, 2022 9:08 PM
To: SCPlanning <scplanning@co.shasta.ca.us>
Subject: Zone Amendment 22-0001 Comment

⚠ EXTERNAL SENDER: Do not follow links or open attachments unless you recognize the sender and know the content is safe.

Dear Commissioners:

Power generated with wind energy benefits everyone in the county due to its mitigation of climate change's deleterious effects, reduction of air pollution and decreased water use. Even if a proposed wind project has significant impacts, impacts and benefits should be considered on a site-specific basis to assess whether its benefits override those impacts.

Please do not recommend a blanket prohibition on wind farms in the county.

Sincerely,

Doug Mandel

Redding, CA 96001


From: Lio Salazar </o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=e15609219fc948f9badbc8e7ec5c14f2-Lio Salazar>
To: Paul Hellman
Sent: 7/11/2022 8:05:00 AM
Subject: FW: Zone Amendment 22-0001 Support LTR
Attachments: BOS Zone Amendment 22-0001 Support Letter 7.10.2022.pdf

FYI.

Lio Salazar, AICP
Planning Division Manager
Shasta County
Department of Resource Management
Planning Division
1855 Placer Street Suite 103
Redding, CA 96001

Ph: 530.225.5532
Fax: 530.245.6468
E-mail: lsalazar@co.shasta.ca.us
Web: http://www.co.shasta.ca.us/index/drm_index/planning_index.aspx

From: Radley Davis <radleydavis09@gmail.com>
Sent: Sunday, July 10, 2022 8:57 PM
To: Shasta County BOS <shastacountybos@co.shasta.ca.us>; Lio Salazar <lsalazar@co.shasta.ca.us>
Subject: Zone Amendment 22-0001 Support LTR

 **EXTERNAL SENDER:** Do not follow links or open attachments unless you recognize the sender and know the content is safe.

Hello Shasta County Board of Supervisors & Lio (staff)

Please see attached letter for your consideration of this upcoming BOS mtg.

Thank you

Radley Davis

From: Ohara, Sean@CALFIRE <Sean.Ohara@fire.ca.gov>
To: Paul Hellman; Dennett, Dan@CALFIRE
Sent: 4/11/2022 7:28:03 PM
Subject: Fwd: Prohibition of Large Wind Energy Systems
Attachments: Wind-farms.pdf

⚠ EXTERNAL SENDER: Do not follow links or open attachments unless you recognize the sender and know the content is safe.

Good evening Paul,

Chief Dennett will be attending the meeting in my place as I was already scheduled to do a presentation for that time frame. Chief Dennett is attached on this message he has been with the department for 30+ years and will be able to answer any question that come up.. If you have questions please give me a call.

Sean O'Hara

From: Paul Hellman <phellman@co.shasta.ca.us>
Sent: Monday, April 11, 2022 5:34:31 PM
To: Ohara, Sean@CALFIRE <Sean.Ohara@fire.ca.gov>
Cc: Zanotelli, Jimmy@CALFIRE <Jimmy.Zanotelli@fire.ca.gov>
Subject: Prohibition of Large Wind Energy Systems

Warning: this message is from an external user and should be treated with caution.

Chief O'Hara,

This Thursday at 2:00 in the Board Chambers the Planning Commission will consider a draft ordinance prohibiting the development of large wind energy systems (those which generate electricity above and beyond the needs of the development on the property where the facility would be located) within the unincorporated area of Shasta County. The primary reason why the Commission directed staff to prepare this ordinance is wildfire hazards based upon the majority of the County being within the High and Very High fire hazard severity zones. This was one of the main reasons for the proposed Fountain Wind Project being denied by both the Planning Commission and Board of Supervisors. Jimmy attended the previous Planning Commission meeting when this issue was discussed and helped to answer questions about the fire hazard severity zones but will not be able to attend this week's meeting; Fire Inspector Scott Ross will be attending the meeting as Jimmy's back-up. Would it be possible for you or another member of your staff to attend the meeting to help address questions from the Commission?

FYI, Attached is a comment letter in opposition to the draft ordinance, which includes a discussion of wildfire on pages 1 through 3. I anticipate that there will be others in attendance who oppose and support the draft ordinance, including some of the most ardent opponents of the Fountain Wind Project.

Thanks,

Paul Hellman, Director

Shasta County Department of Resource Management

(530) 225-5114

<https://www.co.shasta.ca.us/index/drm>



North State Climate Action

Dear Commissioners:

My organization, North State Climate Action (NSCA) is a group of volunteers in California's far North State region. Our mission is to **promote solutions addressing the climate crisis through education, collaboration, and action in our communities.** To avoid increasingly dire effects of climate change, including drought, deadly heat waves and worsening fires, we must cease reliance on fossil fuels as quickly as possible with carbon free energy such as wind power. Wind power has the advantages of limiting climate change, improving air quality, and also significantly reducing water demands that fossil fuel power creates. Additionally, wind power technology is still evolving, and future projects may be able to provide environmental mitigations not available today. Please consider the following comments as you evaluate Zone Amendment 22-0001. Ordinance changes proposed in the amendment prohibit all "large" wind power projects in the unincorporated county regardless of specific project details. Don't propose enactment of a blanket prohibition on a viable, clean and renewable power source in Shasta County.

Wild fire potential may be the most contentious issue for siting wind farms. We have arranged our comments to address fire concerns first. Then we discuss each of the impacts that were determined to be significant but unavoidable in the Fountain Wind project, as those issues will be similar in any future wind power proposal. We then discuss the general plan objectives addressed by staff in their report.

Wildfire

The Fountain Wind EIR deemed fire risk less than significant with proposed mitigations. Similar or additional mitigation would be implemented for any new proposed project. Enhanced fire suppression techniques during construction, operation, and decommissioning could be considered for future proposals, such as:

- Greater fuel free buffer zones surrounding roads and towers;
- Enhanced maintenance for wind tower mechanical, electrical and fire suppression equipment;
- Enhanced maintenance of transmission lines including those off site;
- Burying transmission lines;
- Curtailment of turbines during extreme fire conditions;
- Additional removal of flammable debris along off-site roadsides. This was proposed in the Fountain Wind project, but the scope was apparently not considered adequate by the Supervisors;
- Changes in construction materials. In the Hatchet Mountain project, turbine nacelles were constructed of steel, instead of fiber glass, providing enhanced fire protection.

Also note that the access roads and site work in any wind farm project will provide fire breaks, aiding fire suppression, as noted in the Fountain Wind EIR and by Cal Fire.

The wind turbines at Hatchet Mountain have never experienced a fire, and they have been in operation for 12 years. It's estimated by a wind trade organization that a wind tower has only a 1/2000 to 1/15,000 chance of a fire per year. This review estimated chances of fire to be even lower. These estimates include data from many older towers without cutting edge technology such as automatic nacelle fire suppression.

A major concern expressed by the public, commissioners, and supervisors regarding the Fountain Wind project was the difficulty of aerial fire fighting near the turbines, and that's a valid issue. As indicated by Bret Gouvea with CAL FIRE at the October 26 Board of Supervisors meeting, although the difficulty of fire suppression adjacent to a wind tower is an important consideration, these types of decisions are part of the hazards considered in any fire fighting plan. Mr. Gouvea also noted that all firefighting situations are unique. CAL FIRE could have spoken against the Fountain Wind project as proposed, but did not do so. Additionally, the specific layout of wind towers in a project is important in any analysis of aerial firefighting potential. For example, a linear layout of towers similar to the Hatchet Mountain project would likely simplify aerial fire fighting.

With all the mitigation discussed above, the risk of destructive fires is substantially reduced. Not eliminated, which is impossible, but substantially reduced. In accordance with the EIR for Fountain Wind, fire impacts were reduced to less than significant with mitigation (as

noted, mitigation could be enhanced in future projects) and planning staff concurred with that analysis.

Evaluation of wind project benefits should take into account that the potential loss of life from wind power during its construction and operational life is significantly less than from fossil fuel power. [One source](#) indicates that the number of deaths from fossil fuel power generation (due to fuel extraction, transport, refining, construction, distribution and operation) is almost 150 times that of wind power. In accordance with that information, for a project similar to Fountain Wind there is a 50% chance of one death over a 40 year operation period, versus the potential of 69 deaths from fossil fuel power (primarily due to air pollution). Potential deaths from wild fires sparked by wind power would increase the chance of wind farm deaths to a degree, but it's very unlikely to be comparable to fossil fuel power mortality. It's clear that fossil fuel power kills.

Most of the County is in a high or very high potential fire area according to Figure FS-1 of the General Plan (currently outdated according to staff). All construction activities, well as human occupation in those areas, have the potential to ignite fires. That, however, has not led to considering a prohibition of construction of homes and other buildings anywhere in Shasta County. That risk is accepted. If that type of building can continue, why not wind farms with appropriate mitigations? Additionally, since figure FS-1 of the general plan is not current, and the county is working on updating it, these ordinance changes are premature. Also note that Figure FS-1, although outdated, contains limited areas not considered either high or very high fire risk.

Biological Resources.

There is no doubt that wind towers cause bird and bat mortality. Wind projects should be sited properly and be required to minimize bird and other wildlife losses. Impacts to biological resources were thoroughly discussed in the Fountain Wind EIR and any proposed wind farm project would require the same process. Note that climate change presents a much greater potential for individual and species loss than wind farms. [According to the United Nations](#) climate change may contribute to the extinction of 20–30 percent of all species. [According to the Audubon Society](#), "If climate change continues apace, hundreds of North American bird species' ranges will shrink by at least half by 2100."

Both the [Audubon Society](#) and the [American Bird Conservancy](#) support properly sited wind power. State and Federal departments of Fish and Wildlife made no comments on the final Fountain Wind EIR. Future wind projects could be further constrained to provide additional bird and bat protection, as well as other wildlife. Some promising methods for additional bird fatality reduction include [painting of towers, or even painting one blade of the turbine black](#), and [use of radar](#) to detect approaching flocks so turbines can be temporarily shut down. One

objection raised against Fountain Wind was the adequacy the post-construction bird mortality monitoring. That objection could be overcome by expanding such monitoring beyond the 3 years proposed in that project, perhaps for the life of a project. Studies have also been performed using dogs to better spot birds killed in tower collisions. Compensatory mitigation is another option to preserve bird populations. This mitigation could consist of earmarking land not on the wind farm proper as increased habitat for species of concern, or a project to minimize bird mortality from other causes, such as power transmission that is not a part of the proposed project. Lastly, Fountain Wind proposed that individual turbines could be removed if they were shown to cause unacceptable bird mortality. Such a condition could, and should, be included in any future wind farm proposal.

The issue of wildlife protection in wind projects also must be compared to wildlife impacts from fossil fuel power generation that wind can replace. One study estimated that fossil fuel power resulted in the loss of 10-15 times as many birds as wind power, on a per kilowatt-hour basis. This mortality data included older wind farms, which are more likely to cause bird kill than newer towers.

Aesthetics

Aesthetics tends to be a bit subjective, so we are not going into this issue in detail. It should be noted, however, that wild fires exacerbated by climate change will continue to severely impact the beautiful view sheds of the county.

Cultural and Tribal Resources

Similar to other comments above, it's not possible to discuss this issue in detail until there is a project to analyze. Any project in Shasta County could impinge on Native American concerns and cultural resources, but that is not a given, and any necessary mitigation must be site specific.

Additional mitigations regarding this issue were proposed for Fountain Wind after the Planning Commission hearing, including providing access to areas the tribes considered significant to their cultural and religious practices. That same approach, or others, could be investigated if relevant to a new project.

Air Pollution

The EIR found that impacts from PM10 emissions were significant and unavoidable, but recommended that the Planning commission adopt a statement of overriding considerations to allow the project. Future proposed wind farms would likely have similar issues, but the scope of those issues would depend on the size, location, and other specifics of the project.

Compliance with General Plan Objectives as noted in the staff report.

Following are the General Plan Objectives that were discussed in the staff report and thoughts on how those objectives do not necessarily preclude the construction of wind farms in the county.

Objective FS-1 Protect development from wild land and non-wild land fires by requiring new development projects to incorporate effective site and building design measures commensurate with level of potential risk presented by such a hazard and by discouraging and/or preventing development from locating in high risk fire hazard areas.

The county can fulfill this objective by requiring appropriate mitigations specific to each wind project. It's not possible to adequately analyze a project for fire danger, or even whether it is in a very high fire danger zone, until there is a project to consider and fire hazard zones have been updated by the county. Note the objective does not propose a blanket ban on all projects in high fire danger zones in the county, and the benefits of wind power should be considered in fulfilling this objective. And, as noted above, there is no current consideration of preventing development except for wind farms.

Objective SH-1 Protection of the natural scenery along the official scenic highways of Shasta County from new development which would diminish the aesthetic value of the scenic corridor.

The entire county is not a scenic highway. There are many potential wind project areas adequately distant from the County's designated scenic highways to eliminate wind towers from their view shed. Prohibiting wind farms in the entire County due to aesthetic considerations of scenic highways is overkill. The commission may consider prohibiting wind farms within a prescribed distance of scenic highways, but that determination should again be evaluated taking into account the benefits of wind power. As also noted above, if the risk of wildfires due to relentless temperature increases from climate change continues, the scenic resources along these highways are likely to **burn, eliminating a major portion of their scenic value.**

Objective CO-3 To guide development in a pattern that will respect the natural resource values of County lands and their contributions to the County's economic base.

Harvesting of the wind resources of the county, which will contribute substantially to the county's economy, while helping to reduce green house gases and minimize climate change exacerbated wildfires (which degrade the aesthetic resources of the county with acrid smoke and burned timberland), seems to be a good fit for this objective. The Fountain wind project

has economically benefited the county, as noted by former supervisor Moty at the 26 October 2021 Board of Supervisors meeting, and future wind projects could bring similar benefits.

Objective CO-4 To guide development in a pattern that will minimize land use conflicts between adjacent land users.

We can certainly see that placing wind towers at a location where they would dominate the landscape of adjacent property owners could create a conflict. But these potential conflicts must be weighed along with the potential benefits of a wind farm to everyone in the county.


In conclusion, power generated with wind energy benefits everyone in the county, including indigenous populations, due to its mitigation of climate change's deleterious effects, reduction of air pollution and decreased water use. Even if a proposed wind project has significant impacts, impacts and benefits should be considered on a site specific basis to assess whether its benefits override those impacts.

Please do not recommend a blanket prohibition on wind farms in the county,.

Thank you for the work you do and the opportunity to comment on these proposed ordinance changes.

Ron Dykstra

From: Danielle Osborn Mills <danielle.mills@patternenergy.com>
To: Paul Hellman; Stefany Blankenship; Adam Pressman
CC: Steve Caminati; Adhar Johnson
Sent: 4/14/2022 2:01:14 PM
Subject: Pattern Energy Letter on Item R3
Attachments: Pattern Energy Letter to Shasta County Planning Commission 4.14.22.pdf

 **EXTERNAL SENDER:** Do not follow links or open attachments unless you recognize the sender and know the content is safe.

Good afternoon,
Attached please find a letter to the Shasta County Planning Commission regarding Item R3 for the Planning Commission agenda today.

Many thanks,
Danielle Mills

Danielle Mills
Political and Regulatory Affairs Senior Manager

danielle.mills@patternenergy.com - [patternenergy.com](https://www.patternenergy.com)

Read how Pattern is transitioning the world to renewable energy in our latest [Sustainability Report](#)

...

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April 14, 2022

Shasta County Planning Commission
1855 Placer Street, Suite 103
Redding, CA 96001

Via electronic email

Subject: Proposed Prohibition of Large Wind Energy Systems, Zone Amendment 22-0001)

Dear Chair and Members,

Pattern Energy writes with significant concerns and opposition the proposed amendments to Shasta County's Zoning Code (Zone Amendment 22-0001), prohibiting wind energy systems in unincorporated Shasta County, where they are currently conditionally allowed.

As the owner of Hatchet Ridge Wind Project, Pattern Energy works to bring benefits to Shasta County. Hatchet Ridge Wind expects to generate more than \$30 million over the first 20 years of operations in tax payments benefiting the local region and schools.

The Hatchet Ridge Wind Community Benefits Program invests \$5 million in the local community through the Shasta County General Fund, the Burney-Fall River Education Foundation, and the Burney Regional Community Fund administered by the Community Foundation of the North State.

We want to continue to serve as stewards of the land as we work to provide reliable, low-cost power to Northern Californians, and we pledge to work with you on any future modifications to the project, including a possible repowering.


We understand Shasta County's independence and appreciation for the land and resources it provides to your local communities and hope to work with you in partnership toward a more reliable and affordable power grid.

Sincerely,

Danielle Osborn Mills
Senior Manager, External Affairs
Pattern Energy



From: Henry Woltag <HWoltag@connectgenllc.com>
To: Paul Hellman; Stefany Blankenship; Adam Pressman
CC: Mark Lawlor; Mudge, Annie; John Kuba; Lio Salazar
Sent: 4/14/2022 7:41:33 AM
Subject: Planning Commission Agenda Comment - 4/14/2022
Attachments: 20220413 Cox Castle Nicholson Comments on Proposed Amendments to Shasta County Zoning Code.pdf

 **EXTERNAL SENDER:** Do not follow links or open attachments unless you recognize the sender and know the content is safe.

Dear Shasta County,

Please find attached comments on Agenda Item R3 of today's Planning Commission meeting. If you could confirm receipt it would be much appreciated.

Best,
Henry

Henry Woltag
Director



1001 McKinney, Suite 700
Houston, TX 77002
Cell: 281.520.6995
Email: hwoltag@connectgenllc.com

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April 13, 2022

Shasta County Planning Commission
1855 Placer St Suite 103,
Redding, CA 96001

*Re: Proposed Amendments to Shasta County Zoning Code to Prohibit Large Wind
Energy Systems*

Dear Chair and Members of the Planning Commission:

This firm represents ConnectGen LLC. ConnectGen LLC is a leading developer of renewable energy with projects throughout the United States. I am writing about the proposed amendments to Shasta County's zoning code (Zone Amendment 22-0001) which, if approved, would prohibit "private wind energy production systems not classified as small wind energy systems" (also referred to as "large wind energy systems") in almost all areas of unincorporated Shasta County. The Planning Commission is scheduled to hear this item at its April 14, 2022 regularly scheduled meeting.

Poor Public Policy. There are compelling policy reasons why Shasta County should not adopt the proposed zoning code amendments:

- Large wind energy systems can safely and compatibly be developed in Shasta County, including in areas of high fire risk.
- Shasta County 's professional planning staff recommended approval of both the Hatchett Ridge and Fountain Wind Project because they determined, based on substantial and highly credible evidence that, properly designed and mitigated, large wind energy systems are compatible with high fire risk lands and are not detrimental to health, safety, peace, morals, comfort and general welfare of persons residing or working in the neighborhood or be detrimental or injurious to property or improvements in the neighborhood or to the general welfare of the County.
- No wildfires have resulted from the construction and operation of the Hatchett Ridge project, which has been operational for over 10 years. There is simply no basis to conclude that other wind projects will cause wildfires.
- Small wind energy systems do not supply electricity to the retail market and do appreciably reduce carbon emissions on regional or statewide scale
- Large wind energy systems are a critical part of how California plans to address climate change, which will help reduce wildfire risk.

- Electricity produced from large wind energy systems displaces carbon emissions from fossil fuel power plants.
- Large wind energy systems create jobs and substantial tax benefits for Shasta County.
- Under the existing zoning code, the County can already carefully consider individual large wind energy systems on their merits through the conditional use permit process.

Violation of CEQA. In addition to these policy reasons, there are legal reasons the County should not proceed with the proposed amendments. Based on the current record, adoption of these zoning changes without environmental review would violate the California Environmental Quality Act (CEQA), Public Resources Code section 21100 et seq. Unless a project is exempt, CEQA requires an agency to conduct an environmental review to determine whether a project may have a significant effect on the environment. *Muzzy Ranch Co. v. Solano County Airport Land Use Commission* (2007) 41 Cal. App. 4th 372 at 380-381.) A "[s]ignificant effect on the environment" means a substantial, or potentially substantial, *adverse change in the environment*." Public Resources Code section 21068, italics added.) The Guidelines define "[s]ignificant effect on the environment" as "a substantial, or potentially substantial, *adverse change* in any of the physical conditions within the area affected by the project including land [and] . . . flora" (Guidelines, § 15382, italics added.)

Draft Resolution 2022-013 claims that Zone Amendment 22-0001 is exempt pursuant to CEQA Guidelines sections 15060(c)(2) since "it can be seen with certainty that this ordinance will not result in a direct or reasonably foreseeable indirect physical change in the environment." But this exemption -- known as the "common sense exemption" -- does not apply here for the reasons stated below. Before it can approve these amendments, the County is therefore required to prepare an environmental document in compliance with CEQA.¹

In its entirety, CEQA Guidelines section 15061, subdivision (b)(3) provides: "(b) A project is exempt from CEQA if: [¶] . . . [¶] (3) The activity is covered by the general rule that CEQA applies only to projects which have the potential for causing a significant effect on the environment. Where it can be seen with certainty that there is no possibility that the activity in question may have a significant effect on the environment, the activity is not subject to CEQA."

The common sense exemption can be relied on only if a factual evaluation of the agency's proposed activity reveals that it applies. *Davidon Homes vs City of San Jose* (1997) 54 Cal. App. 4th 106 at 114. The agency invoking the exemption has the burden of demonstrating that it applies. *Id.* at p. 116. Further, it applies only when it is *undisputed* that a project will enhance rather than degrade existing environmental conditions. *CREED-21 v. City of San Diego* (215) 234 Cal. App. 4th 488, 512.

As recognized by the leading treatise on CEQA (see Kostka & Zischke, *Practice under the Environmental Quality Act*, CEB, section 5.112) certain projects ostensibly adopted to protect or

¹ As a threshold matter, the proposed amendment of the zoning ordinance clearly constitutes a "project" subject to CEQA. The staff report makes no argument that the amendment is not a project and immediately addresses the second tier of analysis—whether the project is exempt from CEQA under the commonsense exemption.

improve the environment can have collateral effects on the environment that preclude application of the exemption. As a result, agencies cannot simply assume that measures intended to protect the environment are entirely benign. For example, the court in *Dunn-Edwards Corp. v. Bay Area Air Quality Management District* (1992) 9 Cal. App. 4th 644 overturned amendments to air district regulations designed to reduce the amount of volatile organic carbons (VOCs) in paint and other architectural coatings for failure to comply with CEQA. Because there was evidence that the new regulations would require lower quality products that would result in a net increase in VOC emissions, an exemption under 14 Cal Code Regs §15061(b)(3) was held to be improper. See also *Muzzy Ranch Co. v. Solano County Airport Land Use Commission*, supra, 41 Cal. App. 4th 372 at 380-381 (displacement of development pressure can be environmental impact, but common sense exemption applied to airport land use plan but chiefly because it kept preexisting designations in place); *Wildlife Alive v. Chickering* (1976) 18 Cal. 3d 190 (Fish and Game Commission action setting fishing and hunting seasons has potential for both beneficial and adverse effects on survival of certain species); *Building Code Action v. Energy Resources Conserv. & Dev. Comm'n* (1980) 102 CA 3d 577 (adoption of energy conservation regulations establishing double-glazing standards for new residential construction could have significant impact on air quality as result of increased glass production).

Here, the County's zoning code currently allows wind energy generation projects as a "public utility" in any zoning district with a conditional use permit. As in the *Dunn-Edwards* case and in stark contrast to the *Muzzy Ranch* case (which merely maintained existing zoning regulations and did not change them), the amendments here propose a prohibition on large scale wind energy in the vast majority of the unincorporated area of Shasta County where they are currently conditionally allowed. Draft Resolution 2022-013 defends the application of the common sense exemption on the ground that the prohibition would potentially educe wildfire risk and reduce biological and other impacts *in the County*. However, the Resolution fails to address or acknowledge the indirect but very real adverse regional and statewide impacts of precluding the potential development of approximately 2012 MW of emissions-free wind energy in Shasta County.² Precluding the development of these wind energy projects could result in a lost opportunity to displace 2,143,241 metric tons of CO₂ per year, the equivalent of removing 461,802 gasoline powered passenger vehicles driven for one year³ from the road as well as thwart the California Public Utility Commission's Adopted Plan for procurement of approximately 3500 MW of on-shore wind by 2025. This prohibition would also thwart the State of California's goals contained in SB 100 requiring renewable energy and zero-carbon resources to supply 100% of electric retail sales to end use customers by 2045. It would also undermine the state's goal of reducing GHG emissions by 40% by 2030 compared to 1990 levels under AB 32. A prohibition on all large wind energy systems in Shasta County would also undermine the Shasta County Air Quality Management District's Regional Climate Action Plan

² This figure is derived from the number of acres of private land in the unincorporated part of the County where wind speed would be commercial (above 6 m/s) based on California Energy Commission and National Renewal Energy Laboratories wind maps, then assuming 80 acres per MW.

³ <https://www.epa.gov/energy/greenhouse-gas-equivalencies-calculator>

which reduce community GHG emissions to 49% below 2008 levels by 2035 (i.e. 291,340 MT CO₂e/yr.) This loss of clean electricity from large wind energy systems that could be produced in Shasta County could lead to higher levels of carbon emissions for a longer period, a diminished capacity to slow global warming and potentially higher risk of wildfires. Furthermore, the conclusion that the prohibition would potentially reduce wildfire risk ignores the record from the Fountain Wind conditional use permit which demonstrated that project actually enhanced the fire safety in the area of the project. The record also demonstrated that any impacts to wildlife would be mitigated under CEQA and applicable state and federal laws.

Given these potential results, it is abundantly clear that it *cannot* be seen *with certainty* that there is *no possibility* that the proposed amendments to the zoning code may have a significant effect on the environment. To the contrary, the proposed amendments *quite possibly* may have an adverse impact on the state's ability to address climate change, fight wildfires and reduce carbon emissions, all of which could result in significant adverse impacts on the environment. As such, the common sense exemption does not apply and the County must prepare an environmental analysis in compliance with CEQA before approving such amendments.

Inconsistent with the General Plan. Approval of these amendments would also be in violation of state planning law requiring that the zoning code be consistent with the General Plan. Shasta County's General Plan recognizes that renewable energy, including wind energy, are important features in the County's energy future. An outright prohibition on large wind energy systems would be inconsistent with the stated importance of renewable energy, including wind energy in the County's General Plan:

"Renewable energy resources, coupled with strategies to encourage conservation, are important features in the Shasta County region's energy future. In 2002, the Governor signed the Renewable Portfolio Standard (RPS), SB 1078. This standard requires an annual increase in renewable generation equivalent to at least 1 percent of electricity sales, with an aggregate goal of 20 percent by 2017. Currently renewable generation accounts for 11 percent of retail sales. California's Energy Action Plan has targeted a goal of 20 percent by 2010. 21 Achieving the RPS could displace 20,000 tons of nitrogen oxide (Nox) emissions from gas and coal-fired generation in the Western states over the 2004-2013 time frame. Also, the use of renewable resources can reduce carbon dioxide and greenhouse gas emissions associated with global climate change. Generation of electricity from renewable energy rather than by fossil fuels can reduce CO₂ and other green-house gas emissions associated with climate change. Model simulations in one instance indicate that achieving the RPS by 2010 could reduce annual CO₂ emissions by about 62 million tons by 2013. This is equivalent to estimated annual CO₂ emissions from more than 6 million automobiles. Geothermal energy provides the largest portion of renewable electricity in California where such generation is by systems 30 MW or smaller. Renewable energy (excluding small and large hydropower) provided four percent for the region's energy production in the Western Electricity Coordinating Council (WECC) states. If renewable energy could be used to replace the estimated growth in gas-fired generation from 2004- 2017, the total amount of

renewable energy by 2017 would reach about 38 percent. This would make renewable energy the largest source of electricity generation in California. Overall, existing renewable energy facilities utilize a small proportion of the technical potential for renewable energy in California.

Important renewable energy sources in Shasta County include solar, hydroelectricity, biomass, and cogeneration. There is also potential for development of wind, geothermal, and waste-to-energy as alternative sources of energy production. Technology improvements associated with renewable energy development will be a key to its rate of success. Renewable energy sources can be most effectively applied for space heating and cooling and for electrical generation. For the oil dependent transportation sector, renewable energy solutions involve developing marketable alternative fuel types as the cost of oil rises. Collectively, renewable energy offers a diverse and virtually inexhaustible resource, opportunities for developing new base industries, and all at substantially less environmental cost.


Conclusion: The proposal to prohibit all large wind energy systems in almost all of Shasta County based on the common sense exemption would violate CEQA, be poor public policy, and violate state planning and zoning laws requiring consistency with the General Plan. The County already has the ability to use its discretion to allow or disallow specific projects under the conditional use process. For all of the above reasons, we urge the Planning Commission to reject the proposed amendments.

Very truly yours,

A handwritten signature in blue ink, reading "Anne E. Mudge". The signature is fluid and cursive, with the first name "Anne" and last name "Mudge" clearly legible.

Anne E. Mudge

From: Shasta Environmental Alliance <ecoshasta@gmail.com>
To: Paul Hellman; Adam Fieseler
Sent: 4/13/2022 4:34:55 PM
Subject: RE: REGULATION OF WIND ENERGY SYSTEMS Item R-3
Attachments: REGULATION OF WIND ENERGY SYSTEMS Planning Commission.pdf

 **EXTERNAL SENDER:** Do not **follow** links or open **attachments** unless you recognize **the** sender and know the content is safe.

Dear Mr. Hellman,

Attached are the comments of Shasta Environmental Alliance regarding the proposed ordinance of REGULATION OF WIND ENERGY SYSTEMS item R-3 on the agenda of the Planning Commission meeting of April 14.

Sincerely,

David Ledger
President
Shasta Environmental Alliance
530-355-8542



Shasta Environmental Alliance

P.O. Box 993777 • Redding, CA 96099 • ecoshasta.org

April 13, 2022

Paul Hellman, Director of Resource Management
Shasta County Planning Commissioners
1855 Placer Street
Redding, CA 96001

RE: REGULATION OF WIND ENERGY SYSTEMS

Dear Mr. Hellman and Shasta County Planning Commissioners

This letter is in reference to the proposed ordinance regarding the regulation of wind energy systems and the draft ordinance that you will be considering on your meeting of April 12, 2022.

First, we want to commend the Planning Commission for your thoughtful consideration and eventual denial of the Fountain Wind Project despite considerable support from construction, real estate and business interests in Shasta County and beyond. Due to fire danger in steep and forested terrain, wildlife habitat issues and the concerns of the Pit River Tribe, we too did not support the project.

We do have serious concerns about the draft ordinance you have before you for the following reasons:

LARGE WIND ENERGY PROJECTS

1. It is too broad, eliminating all of Shasta County from any large scale wind projects because of fire hazards ignores the many other sources of wildfires in Shasta County such as automobiles, both on and off highway; outdoor shooting ranges (BLM land near Keswick Dam has had many), gas powered equipment such as lawnmowers (Jones Fire 1999), and perhaps foremost are PG&E powerlines: arson is another common source of wildfires in Shasta County, including the recent Fawn Fire. The number of wildfires caused by wind farms is extremely small and much less than the threat of fire from the above stated reasons.
2. If wind farms are placed in terrain that is not steep nor heavily forested, aerial firefighting planes could still make fire drops. It would also be much easier to make a fire break.

3. These wind farm projects could be an important source of energy, jobs and taxable income for Shasta County and California.

SMALL SCALE WIND PROJECTS

This section is so limiting that it seems to have been written with the sole purpose of even preventing small scale wind energy from being developed in Shasta County, as if someone has a philosophical opposition to wind energy.

The primary problem with this section of the ordinance is that the height limit is 80 feet. This is way to small to catch higher winds that would make a wind turbine profitable. The Walmart Distribution Center south of Red Bluff near Gerber has a wind turbine that is 265 feet tall and provides 15 to 17% of the center's electricity needs. It has been in operation over 10 years and has not caused any fires to my knowledge. I have driven by this turbine many times and it does not detract from the aesthetics of the area.

Monterey County has allowed wind turbines in the Salinas Valley and a number of them have gone up in the area around Gonzales and Greenfield near Highway 101. The towers are up to 300 feet tall and are placed at the end of row crops in the area. While I enjoy the seeing the Coast Range as I drive up that highway, the wind turbines do not detract from the aesthetics. Plus, they give farming interests extra income from leasing out their land as they do to farmers across the United States. By passing this ordinance you could be denying farmers in the Fall River area the opportunity to supplement their farming income in the future.

With the new federal and state requirements mandating increased renewable energy sources, you would be limiting Shasta County from achieving many of these goals. While I'm sure the Shasta County Attorney's office has reviewed this ordinance for its legality, it seems like this is something that could motivate certain legislators to pass a statewide law banning extremely constrictive ordinances such as this one.

We urge you to reconsider this ordinance, it does not seem to have been thoroughly thought out and needs to be changed as noted above.

Sincerely,



David Ledger, President

From: Paul Hellman </O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS /CN=6BBE491255E64F6BB3EEDE982B69B773-PAUL HELLMA>
To: Ron Dykstra; SCPlanning
CC: Lio Salazar; NSCA Steer Comm; Adam Fieseler
Sent: 4/11/2022 2:25:30 PM
Subject: RE: Zone Amendment 22-0001 Regulation of Wind Energy Systems County-Wide, Item R3, 14 April meeting

Mr. Dykstra,

I am in receipt of your comment letter and will forward the pdf version of this document to the members of the Planning Commission this afternoon for their consideration. I verified that all of the hyperlinks in this pdf document work with the exception of the first one on page 4 ("Studies have also been performed using dogs"); clicking it yields a "sorry page not found" error message.

Sincerely,

Paul Hellman, Director

Shasta County Department of Resource Management

(530) 225-5789

<https://www.co.shasta.ca.us/index/drm>


From: Ron Dykstra <dbdykstra@sbcglobal.net>

Sent: Monday, April 11, 2022 1:43 PM

To: SCPlanning <scplanning@co.shasta.ca.us>

Cc: Paul Hellman <phellman@co.shasta.ca.us>; Lio Salazar <lsalazar@co.shasta.ca.us>; NSCA Steer Comm <nscasteercom@googlegroups.com>

Subject: Zone Amendment 22-0001 Regulation of Wind Energy Systems County-Wide, Item R3, 14 April meeting

 **EXTERNAL SENDER:** Do not follow links or open attachments unless you recognize the sender and know the content is safe.

Attached are the comments of North State Climate Action for the subject item, in both Word and PDF format. If you provide hard copies to the planning commissioners, please also provide an electronic copy, so that the document hyperlinks are usable. Please acknowledge receipt of these comments and notify me of any difficulty you have opening them asap.

Thank you,

Ron Dykstra

From: Paul Hellman </O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS /CN=6BBE491255E64F6BB3EEDE982B69B773-PAUL HELLMA>
To: Paul Hellman
CC: James Ross; Adam Pressman; Adam Fieseler
BCC: Tim MacLean; Tim MacLean; Jim Chapin; patrick@wallnerplumbing.com; Donn Walgamuth; skerns7118@aol.com
Sent: 4/14/2022 12:02:29 PM
Subject: Zone Amendment 22-0001 (**Wind Energy Systems Ordinance**)
Attachments: Warren Swanson.pdf

Commissioners,

The attached letter of opposition to the proposed wind energy systems ordinance (Zone Amendment 22-0001) was received this morning.

Thanks,


Paul Hellman, Director
Shasta County Department of Resource Management
(530) 225-5114
<https://www.co.shasta.ca.us/index/drm>

From: Warren Swanson <warrenswanson@gmail.com>

Sent: April 14, 2022 10:19 AM

To: SCPlanning <scplanning@co.shasta.ca.us>

Subject: Wind Farms

 **EXTERNAL SENDER:** Do not follow links or open attachments unless you recognize the sender and know the content is safe.

Planning Commissioners,

I'd like to make a comment on the proposal to ban all windmills from Shasta County. This is a deeply flawed and regressive idea. Shasta County has already received copious amounts of negative press around the country (New York Times, LA Times, SF Chronicle) about our fringe right wing groups. We don't need more articles painting us as a joke hick town (we are not).

Climate change is real and happening faster than predicted.
We need all hands on deck to slow it down and wind power is
one way to do that.

Please do the right thing and reject this ridiculous proposal.

Warren Swanson
3299 Woodbury Dr, Redding, CA 96002
223-4959

From: Paul Hellman </O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS /CN=6BBE491255E64F6BB3EEDE982B69B773-PAUL HELLMA>
To: Paul Hellman
CC: James Ross; Adam Pressman; Adam Fieseler; William Abbott
BCC: Tim MacLean; Tim MacLean; Jim Chapin; Donn Walgamuth; patrick@wallnerplumbing.com; skerns7118@aol.com
Sent: 4/14/2022 10:20:43 AM
Subject: Zone Amendment 22-0001 (Wind Energy Systems Ordinance)
Attachments: CalWEA_Letter_to_Shasta_County_re_Wind_Moratorium_(4-14-22).pdf

Commissioners,

The attached letter of opposition to the proposed wind energy systems ordinance (Zone Amendment 22-0001) was received this morning.

Thanks,

Paul Hellman, Director

Shasta County Department of Resource Management

(530) 225-5114

<https://www.co.shasta.ca.us/index/drm>



California Wind Energy Association

April 14, 2022

Shasta County Planning Commission
1855 Placer St Suite 103
Redding, CA 96001

Via email

Re: Proposed Prohibition of Large Wind Energy Systems

Dear Chair and Members of the Planning Commission:

The California Wind Energy Association (CalWEA)¹ writes with alarm regarding the proposed amendments to Shasta County's zoning code (Zone Amendment 22-0001) that are before you today. If approved, these amendments would prohibit large wind energy systems in almost all areas of unincorporated Shasta County where they are currently conditionally allowed.

CalWEA urges the Planning Commission to reject the proposed amendments outright. At a minimum, the County must prepare an environmental analysis in compliance with the California Environmental Quality Act (CEQA) before considering such amendments.

Wind energy will play a critical role in meeting California's climate change mitigation goals aimed at the root cause of the drought and wildfires that are wreaking havoc in California. A study performed for the California Energy Commission looking at means of achieving California's energy-decarbonization goal² shows that dramatic growth in wind energy will be required to achieve that goal most affordably while ensuring the reliability of the grid.³ The California Public Utilities Commission's resource plan includes over 3,500 megawatts

¹ CalWEA is a 20-year-old trade association representing wind energy and related companies focused on the California market, primarily including owners, operators and developers of wind energy projects located in California and in waters off the California coast.

² SB 100, signed into law in September 2018, establishes as state policy that zero-carbon resources are to supply 100% of California retail sales by December 31, 2045.

³ California Energy Commission, "Deep Decarbonization in a High Renewables Future," at Figure 14. CEC-500-2018-012. June 2018. (Available at: <https://www.energy.ca.gov/2018publications/CEC-500-2018-012/CEC-500-2018-012.pdf>.) This study shows that, absent a large amount of wind energy from within or outside of the state to balance solar resources, decarbonization will come at an added cost of nearly \$20 billion per year. Also see

(MW) of additional wind energy delivered to the Cal-ISO grid by 2025,⁴ a 60 percent increase in the amount of wind energy generation currently operating in California. Realizing the state's clean energy goals, of which in-state wind energy is a critical component, will require counties to recognize, in their planning and permitting decisions, that wind energy projects must be part of the solution to the most pressing environmental problem of our time.

Shasta County's professional planning staff have previously found that two properly designed large wind energy projects are compatible with high-fire-risk lands and are not detrimental to health, safety, and general welfare of neighboring persons. The Hatchett Ridge wind project has been safely operating for over 10 years. At the same time, wind energy projects bring important economic benefits to local communities, including jobs and tax base.

For these reasons, CalWEA urges the Commission to reject the proposed amendments. At a minimum, as explained in a letter submitted to the Commission on this matter by Cox Castle & Nicholson LLP (dated April 13, 2022), the County must prepare environmental review documents in compliance with CEQA before considering this proposal. The collateral impacts on the environment from the proposed amendments could include failure to achieve California's climate change mitigation plans.

Sincerely,



Nancy Rader
Executive Director

⁴ California Public Utilities Commission Decision 22-02-004 at Table 5 (February 10, 2022).

From: Paul Hellman </O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS /CN=6BBE491255E64F6BB3EEDE982B69B773-PAUL HELLMA>
To: Paul Hellman
CC: James Ross; Adam Pressman; Adam Fieseler
BCC: Tim MacLean; Tim MacLean; Jim Chapin; patrick@wallnerplumbing.com; Donn Walgamuth; skerns7118@aol.com
Sent: 4/14/2022 8:20:53 AM
Subject: Zone Amendment 22-0001 (Wind Energy Systems Ordinance)
Attachments: MaryAnn McCrary.pdf; 20220413 Cox Castle Nicholson Comments on Proposed Amendments to Shasta County Zoning Code.pdf

Commissioners,

The attached letters of opposition to the proposed wind energy systems ordinance (Zone Amendment 22-0001) were received this morning.

Thanks,
Paul Hellman, Director
Shasta County Department of Resource Management
(530) 225-5114
<https://www.co.shasta.ca.us/index/drm>

April 13, 2022

Shasta County Planning Commission
1855 Placer St Suite 103,
Redding, CA 96001

*Re: Proposed Amendments to Shasta County Zoning Code to Prohibit Large Wind
Energy Systems*

Dear Chair and Members of the Planning Commission:

This firm represents ConnectGen LLC. ConnectGen LLC is a leading developer of renewable energy with projects throughout the United States. I am writing about the proposed amendments to Shasta County's zoning code (Zone Amendment 22-0001) which, if approved, would prohibit "private wind energy production systems not classified as small wind energy systems" (also referred to as "large wind energy systems") in almost all areas of unincorporated Shasta County. The Planning Commission is scheduled to hear this item at its April 14, 2022 regularly scheduled meeting.

Poor Public Policy. There are compelling policy reasons why Shasta County should not adopt the proposed zoning code amendments:

- Large wind energy systems can safely and compatibly be developed in Shasta County, including in areas of high fire risk.
- Shasta County 's professional planning staff recommended approval of both the Hatchett Ridge and Fountain Wind Project because they determined, based on substantial and highly credible evidence that, properly designed and mitigated, large wind energy systems are compatible with high fire risk lands and are not detrimental to health, safety, peace, morals, comfort and general welfare of persons residing or working in the neighborhood or be detrimental or injurious to property or improvements in the neighborhood or to the general welfare of the County.
- No wildfires have resulted from the construction and operation of the Hatchett Ridge project, which has been operational for over 10 years. There is simply no basis to conclude that other wind projects will cause wildfires.
- Small wind energy systems do not supply electricity to the retail market and do appreciably reduce carbon emissions on regional or statewide scale
- Large wind energy systems are a critical part of how California plans to address climate change, which will help reduce wildfire risk.

- Electricity produced from large wind energy systems displaces carbon emissions from fossil fuel power plants.
- Large wind energy systems create jobs and substantial tax benefits for Shasta County.
- Under the existing zoning code, the County can already carefully consider individual large wind energy systems on their merits through the conditional use permit process.

Violation of CEQA. In addition to these policy reasons, there are legal reasons the County should not proceed with the proposed amendments. Based on the current record, adoption of these zoning changes without environmental review would violate the California Environmental Quality Act (CEQA), Public Resources Code section 21100 et seq. Unless a project is exempt, CEQA requires an agency to conduct an environmental review to determine whether a project may have a significant effect on the environment. *Muzzy Ranch Co. v. Solano County Airport Land Use Commission* (2007) 41 Cal. App. 4th 372 at 380-381.) A "[s]ignificant effect on the environment" means a substantial, or potentially substantial, *adverse change in the environment*." Public Resources Code section 21068, italics added.) The Guidelines define "[s]ignificant effect on the environment" as "a substantial, or potentially substantial, *adverse change* in any of the physical conditions within the area affected by the project including land [and] . . . flora" (Guidelines, § 15382, italics added.)

Draft Resolution 2022-013 claims that Zone Amendment 22-0001 is exempt pursuant to CEQA Guidelines sections 15060(c)(2) since "it can be seen with certainty that this ordinance will not result in a direct or reasonably foreseeable indirect physical change in the environment." But this exemption -- known as the "common sense exemption" -- does not apply here for the reasons stated below. Before it can approve these amendments, the County is therefore required to prepare an environmental document in compliance with CEQA.¹

In its entirety, CEQA Guidelines section 15061, subdivision (b)(3) provides: "(b) A project is exempt from CEQA if: [¶] . . . [¶] (3) The activity is covered by the general rule that CEQA applies only to projects which have the potential for causing a significant effect on the environment. Where it can be seen with certainty that there is no possibility that the activity in question may have a significant effect on the environment, the activity is not subject to CEQA."

The common sense exemption can be relied on only if a factual evaluation of the agency's proposed activity reveals that it applies. *Davidon Homes vs City of San Jose* (1997) 54 Cal. App. 4th 106 at 114. The agency invoking the exemption has the burden of demonstrating that it applies. *Id.* at p. 116. Further, it applies only when it is *undisputed* that a project will enhance rather than degrade existing environmental conditions. *CREED-21 v. City of San Diego* (215) 234 Cal. App. 4th 488, 512.

As recognized by the leading treatise on CEQA (see Kostka & Zischke, *Practice under the Environmental Quality Act*, CEB, section 5.112) certain projects ostensibly adopted to protect or

¹ As a threshold matter, the proposed amendment of the zoning ordinance clearly constitutes a "project" subject to CEQA. The staff report makes no argument that the amendment is not a project and immediately addresses the second tier of analysis—whether the project is exempt from CEQA under the commonsense exemption.

improve the environment can have collateral effects on the environment that preclude application of the exemption. As a result, agencies cannot simply assume that measures intended to protect the environment are entirely benign. For example, the court in *Dunn-Edwards Corp. v. Bay Area Air Quality Management District* (1992) 9 Cal. App. 4th 644 overturned amendments to air district regulations designed to reduce the amount of volatile organic carbons (VOCs) in paint and other architectural coatings for failure to comply with CEQA. Because there was evidence that the new regulations would require lower quality products that would result in a net increase in VOC emissions, an exemption under 14 Cal Code Regs §15061(b)(3) was held to be improper. See also *Muzzy Ranch Co. v. Solano County Airport Land Use Commission*, supra, 41 Cal. App. 4th 372 at 380-381 (displacement of development pressure can be environmental impact, but common sense exemption applied to airport land use plan but chiefly because it kept preexisting designations in place); *Wildlife Alive v. Chickering* (1976) 18 Cal. 3d 190 (Fish and Game Commission action setting fishing and hunting seasons has potential for both beneficial and adverse effects on survival of certain species); *Building Code Action v. Energy Resources Conserv. & Dev. Comm'n* (1980) 102 CA 3d 577 (adoption of energy conservation regulations establishing double-glazing standards for new residential construction could have significant impact on air quality as result of increased glass production).

Here, the County's zoning code currently allows wind energy generation projects as a "public utility" in any zoning district with a conditional use permit. As in the *Dunn-Edwards* case and in stark contrast to the *Muzzy Ranch* case (which merely maintained existing zoning regulations and did not change them), the amendments here propose a prohibition on large scale wind energy in the vast majority of the unincorporated area of Shasta County where they are currently conditionally allowed. Draft Resolution 2022-013 defends the application of the common sense exemption on the ground that the prohibition would potentially educe wildfire risk and reduce biological and other impacts *in the County*. However, the Resolution fails to address or acknowledge the indirect but very real adverse regional and statewide impacts of precluding the potential development of approximately 2012 MW of emissions-free wind energy in Shasta County.² Precluding the development of these wind energy projects could result in a lost opportunity to displace 2,143,241 metric tons of CO₂ per year, the equivalent of removing 461,802 gasoline powered passenger vehicles driven for one year³ from the road as well as thwart the California Public Utility Commission's Adopted Plan for procurement of approximately 3500 MW of on-shore wind by 2025. This prohibition would also thwart the State of California's goals contained in SB 100 requiring renewable energy and zero-carbon resources to supply 100% of electric retail sales to end use customers by 2045. It would also undermine the state's goal of reducing GHG emissions by 40% by 2030 compared to 1990 levels under AB 32. A prohibition on all large wind energy systems in Shasta County would also undermine the Shasta County Air Quality Management District's Regional Climate Action Plan

² This figure is derived from the number of acres of private land in the unincorporated part of the County where wind speed would be commercial (above 6 m/s) based on California Energy Commission and National Renewal Energy Laboratories wind maps, then assuming 80 acres per MW.

³ <https://www.epa.gov/energy/greenhouse-gas-equivalencies-calculator>

which reduce community GHG emissions to 49% below 2008 levels by 2035 (i.e. 291,340 MT CO₂e/yr.) This loss of clean electricity from large wind energy systems that could be produced in Shasta County could lead to higher levels of carbon emissions for a longer period, a diminished capacity to slow global warming and potentially higher risk of wildfires. Furthermore, the conclusion that the prohibition would potentially reduce wildfire risk ignores the record from the Fountain Wind conditional use permit which demonstrated that project actually enhanced the fire safety in the area of the project. The record also demonstrated that any impacts to wildlife would be mitigated under CEQA and applicable state and federal laws.

Given these potential results, it is abundantly clear that it *cannot* be seen *with certainty* that there is *no possibility* that the proposed amendments to the zoning code may have a significant effect on the environment. To the contrary, the proposed amendments *quite possibly* may have an adverse impact on the state's ability to address climate change, fight wildfires and reduce carbon emissions, all of which could result in significant adverse impacts on the environment. As such, the common sense exemption does not apply and the County must prepare an environmental analysis in compliance with CEQA before approving such amendments.

Inconsistent with the General Plan. Approval of these amendments would also be in violation of state planning law requiring that the zoning code be consistent with the General Plan. Shasta County's General Plan recognizes that renewable energy, including wind energy, are important features in the County's energy future. An outright prohibition on large wind energy systems would be inconsistent with the stated importance of renewable energy, including wind energy in the County's General Plan:

"Renewable energy resources, coupled with strategies to encourage conservation, are important features in the Shasta County region's energy future. In 2002, the Governor signed the Renewable Portfolio Standard (RPS), SB 1078. This standard requires an annual increase in renewable generation equivalent to at least 1 percent of electricity sales, with an aggregate goal of 20 percent by 2017. Currently renewable generation accounts for 11 percent of retail sales. California's Energy Action Plan has targeted a goal of 20 percent by 2010. 21 Achieving the RPS could displace 20,000 tons of nitrogen oxide (Nox) emissions from gas and coal-fired generation in the Western states over the 2004-2013 time frame. Also, the use of renewable resources can reduce carbon dioxide and greenhouse gas emissions associated with global climate change. Generation of electricity from renewable energy rather than by fossil fuels can reduce CO₂ and other green-house gas emissions associated with climate change. Model simulations in one instance indicate that achieving the RPS by 2010 could reduce annual CO₂ emissions by about 62 million tons by 2013. This is equivalent to estimated annual CO₂ emissions from more than 6 million automobiles. Geothermal energy provides the largest portion of renewable electricity in California where such generation is by systems 30 MW or smaller. Renewable energy (excluding small and large hydropower) provided four percent for the region's energy production in the Western Electricity Coordinating Council (WECC) states. If renewable energy could be used to replace the estimated growth in gas-fired generation from 2004- 2017, the total amount of

renewable energy by 2017 would reach about 38 percent. This would make renewable energy the largest source of electricity generation in California. Overall, existing renewable energy facilities utilize a small proportion of the technical potential for renewable energy in California.

Important renewable energy sources in Shasta County include solar, hydroelectricity, biomass, and cogeneration. There is also potential for development of wind, geothermal, and waste-to-energy as alternative sources of energy production. Technology improvements associated with renewable energy development will be a key to its rate of success. Renewable energy sources can be most effectively applied for space heating and cooling and for electrical generation. For the oil dependent transportation sector, renewable energy solutions involve developing marketable alternative fuel types as the cost of oil rises. Collectively, renewable energy offers a diverse and virtually inexhaustible resource, opportunities for developing new base industries, and all at substantially less environmental cost.

Conclusion: The proposal to prohibit all large wind energy systems in almost all of Shasta County based on the common sense exemption would violate CEQA, be poor public policy, and violate state planning and zoning laws requiring consistency with the General Plan. The County already has the ability to use its discretion to allow or disallow specific projects under the conditional use process. For all of the above reasons, we urge the Planning Commission to reject the proposed amendments.

Very truly yours,

A handwritten signature in blue ink that reads "Anne E. Mudge". The signature is fluid and cursive, with the first name "Anne" and last name "Mudge" being clearly legible, and "E." as a small middle initial.

Anne E. Mudge

From: MaryAnn M <mamcfree@gmail.com>
Sent: April 13, 2022 5:13 PM
To: SCPlanning <scplanning@co.shasta.ca.us>
Subject: Zone Amendment 22-0001

EXTERNAL SENDER: Do not follow links or open attachments unless you recognize the sender and know the content is safe.

Shasta County Planning Commissioners: As a citizen of Shasta County since 2005, I am concerned that the proposed Zone Amendment 22-0001 regarding regulation of Wind Energy Systems County-Wide is overly broad and restrictive. There are large areas in Shasta County that are not in a high fire hazard zone. In these areas the most crucial objections to the Fountain Wind Project would have been moot. Also, mitigations for the impacts of wind farms are improving. We do need to reduce our reliance on fossil fuels, that have many negative impacts on the environment and our climate. Please do not commit the error of government over-reach in a County that is predominantly anti-Govenent already. Thank you.

Sincerely,
MaryAnn McCrary
5136 Bidwell Road
Redding, CA. 96001

REV-SLWP0000247

COS0000232

From: Paul Hellman </O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS /CN=6BBE491255E64F6BB3EEDE982B69B773-PAUL HELLMA>
To: Paul Hellman
CC: James Ross; Adam Pressman; Adam Fieseler
BCC: Tim MacLean; Tim MacLean; Jim Chapin; Donn Walgamuth; patrick@wallnerplumbing.com; skerns7118@aol.com
Sent: 4/13/2022 6:42:32 PM
Subject: Zone Amendment 22-0001 (Wind Energy Systems Ordinance)
Attachments: REGULATION OF WIND ENERGY SYSTEMS Planning Commission.pdf

Commissioners,

The attached letter of opposition to the proposed wind energy systems ordinance (Zone Amendment 22-0001) from the Shasta Environmental Alliance was received this afternoon.

Thanks,

Paul Hellman, Director
Shasta County Department of Resource Management
(530) 225-5114
<https://www.co.shasta.ca.us/index/drm>



Shasta Environmental Alliance

P.O. Box 993777 • Redding, CA 96099 • ecoshasta.org

April 13, 2022

Paul Hellman, Director of Resource Management
Shasta County Planning Commissioners
1855 Placer Street
Redding, CA 96001

RE: REGULATION OF WIND ENERGY SYSTEMS

Dear Mr. Hellman and Shasta County Planning Commissioners

This letter is in reference to the proposed ordinance regarding the regulation of wind energy systems and the draft ordinance that you will be considering on your meeting of April 12, 2022.

First, we want to commend the Planning Commission for your thoughtful consideration and eventual denial of the Fountain Wind Project despite considerable support from construction, real estate and business interests in Shasta County and beyond. Due to fire danger in steep and forested terrain, wildlife habitat issues and the concerns of the Pit River Tribe, we too did not support the project.

We do have serious concerns about the draft ordinance you have before you for the following reasons:

LARGE WIND ENERGY PROJECTS

1. It is too broad, eliminating all of Shasta County from any large scale wind projects because of fire hazards ignores the many other sources of wildfires in Shasta County such as automobiles, both on and off highway; outdoor shooting ranges (BLM land near Keswick Dam has had many), gas powered equipment such as lawnmowers (Jones Fire 1999), and perhaps foremost are PG&E powerlines: arson is another common source of wildfires in Shasta County, including the recent Fawn Fire. The number of wildfires caused by wind farms is extremely small and much less than the threat of fire from the above stated reasons.
2. If wind farms are placed in terrain that is not steep nor heavily forested, aerial firefighting planes could still make fire drops. It would also be much easier to make a fire break.

3. These wind farm projects could be an important source of energy, jobs and taxable income for Shasta County and California.

SMALL SCALE WIND PROJECTS

This section is so limiting that it seems to have been written with the sole purpose of even preventing small scale wind energy from being developed in Shasta County, as if someone has a philosophical opposition to wind energy.

The primary problem with this section of the ordinance is that the height limit is 80 feet. This is way to small to catch higher winds that would make a wind turbine profitable. The Walmart Distribution Center south of Red Bluff near Gerber has a wind turbine that is 265 feet tall and provides 15 to 17% of the center's electricity needs. It has been in operation over 10 years and has not caused any fires to my knowledge. I have driven by this turbine many times and it does not detract from the aesthetics of the area.

Monterey County has allowed wind turbines in the Salinas Valley and a number of them have gone up in the area around Gonzales and Greenfield near Highway 101. The towers are up to 300 feet tall and are placed at the end of row crops in the area. While I enjoy the seeing the Coast Range as I drive up that highway, the wind turbines do not detract from the aesthetics. Plus, they give farming interests extra income from leasing out their land as they do to farmers across the United States. By passing this ordinance you could be denying farmers in the Fall River area the opportunity to supplement their farming income in the future.

With the new federal and state requirements mandating increased renewable energy sources, you would be limiting Shasta County from achieving many of these goals. While I'm sure the Shasta County Attorney's office has reviewed this ordinance for its legality, it seems like this is something that could motivate certain legislators to pass a statewide law banning extremely constrictive ordinances such as this one.

We urge you to reconsider this ordinance, it does not seem to have been thoroughly thought out and needs to be changed as noted above.

Sincerely,



David Ledger, President

From: Paul Hellman </O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS /CN=6BBE491255E64F6BB3EEDE982B69B773-PAUL HELLMA>
To: Paul Hellman
CC: James Ross; Adam Pressman; Adam Fieseler
BCC: Tim MacLean; Tim MacLean; Jim Chapin; Donn Walgamuth; patrick@wallnerplumbing.com; skerns7118@aol.com
Sent: 4/13/2022 2:31:50 PM
Subject: Zone Amendment 22-0001 (Wind Energy Systems Ordinance)
Attachments: Carole Crowe.pdf; Doug Mandel.pdf; Jim Wiegand.pdf

Commissioners,

The attached comments regarding the proposed wind energy systems ordinance (Zone Amendment 22-0001), two in opposition and one in favor, were received since last night.

Thanks,

Paul Hellman, Director

Shasta County Department of Resource Management

(530) 225-5114

<https://www.co.shasta.ca.us/index/drm>

From: [CAROLE CROWE](#)
To: [SCPlanning](#)
Cc: [Paul Hellman](#); [Lio Salazar](#); [NSCA Steer Comm](#)
Subject: Zone Amendment 22-0001 Regulation of Wind Energy Systems County-Wide, Item R3, 14 April meeting
Date: Tuesday, April 12, 2022 7:08:27 PM

EXTERNAL SENDER: Do not follow links or open attachments unless you recognize the sender and know the content is safe.

Shasta County Planning Commissioners,

I believe that Shasta County should continue to consider future wind energy projects. I understand the concerns that have caused the County to dismiss recent wind power projects; however, each project should be evaluated separately. Appropriate mitigation measures should be required to reduce negative impacts. Wind power is a relatively clean energy that can help to reduce our dependence on fossil fuels.

It seems short-sighted to dismiss all large-scale wind energy projects in Shasta County. Please do not adopt Zone Amendment 22-0001.

Thank you for considering my concerns.

Carole Crowe
Redding, CA

From: Doug Mandel <skagit3@gmail.com>
Sent: April 12, 2022 9:08 PM
To: SCPlanning <scplanning@co.shasta.ca.us>
Subject: Zone Amendment 22-0001 Comment

⚠ EXTERNAL SENDER: Do not follow links or open attachments unless you recognize the sender and know the content is safe.

Dear Commissioners:

Power generated with wind energy benefits everyone in the county due to its mitigation of climate change's deleterious effects, reduction of air pollution and decreased water use. Even if a proposed wind project has significant impacts, impacts and benefits should be considered on a site-specific basis to assess whether its benefits override those impacts.

Please do not recommend a blanket prohibition on wind farms in the county.

Sincerely,

Doug Mandel

Redding, CA 96001

Comments for Planning Commission regarding the prohibition of large wind energy systems within the unincorporated area of Shasta County

I think it's a fantastic idea to prohibit large wind energy systems in Shasta County because these countryside monsters do catch fire on a regular basis. This is a real ongoing threat for all of Shasta County. At some point, it is likely that one of the Hatchet Ridge wind turbines will catch fire, so I hope fire crews will be able to minimize the damage.

People across the world send me videos of turbine fires several times a year. This link shows a recent one.

<https://www.facebook.com/richard.major1/videos/10110297277215878>

But besides the wildfire dangers from wind turbines and infrastructure, there are other very good reasons to forever ban these systems in Shasta County. This industry and our government agencies lie about nearly everything with these energy systems and it's at the expense of the public. Below is new factual information I have put together for Shasta County that I want to be part of the official record.

The Interior Department's New Bald Eagle Take Numbers

America's green energy fraud has been going on for decades and as I have discovered, it never sleeps.

The Interior Department, with fraudulent research and has announced new imaginary bald eagle population estimates of about 317,000 bald eagles, New limits on the number of bald eagles that can be killed by industry each year have been increased to [15,832](#). The previous take limit, also created with fraudulent research, was set in 2016, at [4200 bald eagles](#) annually.

From [Federal Register](#)"Although some of the increase in the estimates of population size from 2009 to 2019 can be attributed to improvements in methods, the majority of the increase is likely due to population growth, estimated to be around 10 percent per year."

Improvements in "methods" really means, continue to ignore real world conditions dismiss the bald eagle habitat abandonment near wind farms like Hatchet Ridge and crank up the rigging for investors.

Not sure if the Interior Departments new eagle population estimates include Alaska or not but the population of [Alaska's bald eagles](#) is about 30,000. Alaska by leaps and bounds, has more bald eagles than any other state. Subtract that number from 316,708 and we are supposed to believe that on average, each of the lower 48 states has a population average of 5,971 bald eagles. In California the bald eagle population doesn't even come close and we might have 1/3 this number, but no more.

Here in Shasta County, CA, we easily have the highest density of bald eagles in the state and the total population including juveniles is about 150. Except for occasional migrants, many of California's 58 counties don't even have bald eagles. My Estimate is that there could be 1500 bald eagles living in CA.

As for Having 5791 bald eagles living in Ca, at some point it could be possible but the turbines killing them off in at Altamont and in the Delta region, would have to be destroyed. As for each of the lower 48 states having an average population of 5,971 bald eagles, it's not possible and in fact, the state of Alaska is the only state with this number of bald eagles.

The Interior Department has lied about the bald eagle population for 48 out of the 49 states with bald eagles. Keep in mind, they also produced a [fake study](#) that overestimated a golden eagle population in central CA by over 10 times.

Green Energy's Hidden Eagle Slaughter

Recently an American wind energy company pleaded guilty to federal criminal charges after at least 150 eagles were killed since 2012. The company has agreed to spend as much as \$27 million on efforts to prevent more deaths.

The company has agreed to spend up to 27 million to prevent more deaths. What good is this? Except for shutting down turbines, there is no way to prevent eagle deaths from wind energy. This industry and the USFWS are very aware of this because wind turbines have been annihilating eagles for decades.

The truth is, these 150 dead eagles are only the tip of the iceberg and very likely represent less than 1% of this ongoing carnage. Back in 1997, when California was the only state with wind turbines in eagle habitat, the Denver Eagle Repository, reported wind turbines being one of their primary sources for their yearly 800 eagle carcasses. When compared to 1997, America now has 80 times more installed wind energy than it did back then 1997. Today, based upon Repository records released up to 2014, the Denver Repository now receives over 3000 eagle carcasses a year.

But with this green energy expansion came a new era of wind turbines. These new turbines invading eagle habitats, were also far more deadly. Early turbines had blade tip speeds that were 110-120 mph while tip speeds for new turbines have speeds twice as fast.

Why doesn't the public know about any of this?

- 1) Wind energy mortality disclosures are not required, scientific research is not required and all wind industry mortality research being conducted, is being staged.
- 2) In 1997, the Clinton Administration created new laws so this ongoing slaughter could be conveniently considered, a business trade secret.
- 3) In 1997, The Freedom of information Act was changed to protect this industry.

4) In 1997, Interior Department personnel were silenced and their employment required non-disclosure agreements with very strict penalties.

5) In 1997, the Denver Eagle Repository was silenced and no longer allowed to discuss the origin of their eagle carcasses.

6) Leaseholders in partnership with wind energy developers are also required to sign very strict non-disclosure agreements. These leaseholders are never allowed to discuss species mortality taking place from the wind turbines on their property. They're also required to immediately dispose of carcasses. Even with post construction mortality research, access by leaseholders and wind energy employees has never been restricted during studies.

6.2.5 Disposal of Animal Carcasses. Owner agrees to take all reasonable measures to avoid attracting scavenging birds and other animals by ensuring all animal carcasses on the Property are immediately (to the extent permitted by applicable law) burned, buried, adequately and completely composted by covering with an adequate amount of earth or mulch, cooked or placed in enclosed containers with lids if such carcasses will be removed at a later time from the Property. Animal carcasses shall not be left in open fields or adjacent to buildings and shall not be left uncovered or exposed.

Since 1997, nobody involved with wind energy and its eagle carcasses, has been allowed to disclose the truth.

Dead Eagle numbers

The Interior Department and USFWS claim that they keep no records for the origin of these eagle carcasses.

An Email I received from USFWS agent Jill Birchell in 2016, confirmed this government protocol of secrecy.

"Hi Jim,

I checked with our repository and learned that they don't keep detailed records of where the eagles they receive come from."

Up to the year 2014, the Repository did report eagle carcasses being received and processed. For 2014 they reported receiving 2309 eagle carcasses for dispersal to American Indians and noted others that had not been counted, which would likely bring totals to about 2400. Since 2014 the numbers of eagle carcasses being processed for the Native Americans is no longer being given out.

NATIONAL EAGLE REPOSITORY ANNUAL REPORT: 10/01/13 – 09/30/14						
REGION	WHOLE EAGLES AND EAGLE PARTS RECEIVED			WHOLE EAGLE ORDERS FILLED	EAGLE FEATHER & PARTS ORDERS FILLED	COMBINED FILLED ORDERS BY REGION
			REGION TOTAL	BALD/GOLDEN	BALD/GOLDEN	
1			239	135	376	511
2			65	479	1,113	1,592
3	Iowa Region		591	129	357	486
4			352	24	114	138
5			229	24	110	134
6			492	170	519	689
7			216	3	13	16
8			125	62	240	302
TOTAL			2,309	1,026	2,842	3,868
NEW REQUESTS RECEIVED						
	BALD EAGLES		1,176	LAST REPOSITORY Report Published		
	GOLDEN EAGLES		1,795			
	EITHER SPECIES		1,379			
	TOTAL		4,350			
NOTES: The incoming bird count is not complete as we are still evaluating birds received in September. The final total number of birds and bird parts received will probably be about 2,400. The total number of eagles and parts shipped, as well as the number of new requests received are complete as of 10/22/14. 2842 "parts" orders due to more eagles hit by turbines now being found more mutilated						

But this eagle carcass story doesn't end with just Repository Eagles being processed for American Indians. There are many other carcasses because "clean" eagles are required for ceremonies; eagles that have died as a result of electrocution, vehicle collision, unlawful shooting or trapping, poisoning or from natural causes are unacceptable for ceremonial sacrifice.

In 2014 NBC did a story on the Denver Repository 2014. In this story about recycling eagles to American Indians, the repository reported that they had processed about 42,000 eagle carcasses. This Interior Department facility was opened in 1995.

<https://www.nbcwashington.com/news/local/protecting-eagles-in-life-and-death/1985909/>

In the interview discussing Wildlife Repository Specialist Dennis Wiist, this was revealed ... "But at last count, almost 42,000, he's touched nearly every eagle that's come through this facility."

Add another 8 years of receiving 2500-3000 eagles and about anyone past the eighth grade can come up with an estimate of over 60,000 eagle carcasses since 1995. It's hard to imagine and even harder to stomach, but over 60,000 eagle carcasses have secretly shipped to this repository, with no cause of death or origin given. When Shasta County approved the Hatchet Ridge wind project, this county became a part of this green fraud on America.

If federal prosecutors really wanted prosecute green energy's eagle kills

Even though the USFWS won't report the carcasses it would still be fairly easy to prove what's taking place with America's hidden eagle carnage through indirect means. Sort of like using cell phone tracking data to convict a murderer.

The prosecution of 150 eagles killed since 2012 is nothing to get excited about when nothing has been done about tens of thousands of other eagles killed by wind energy. America's silenced USFWS agents know exactly what's taking place because they process and arrange FedEx overnight shipping for nearly all the eagle carcasses shipped to the Denver Eagle Repository.

If federal prosecutors wanted the truth, a look into FedEx records would give investigators a very good idea what's taken place. From FedEx they would know the origin of shipments, they would see the proof of millions paid out by the US government for overnight shipping and the weight of crates would indicate the number of eagles per shipment. Surveillance on the Repository site in Denver would also clue investigators in on the number of Fed Ex shipments coming in per week.

Another way for prosecutors to get to the truth about green energy's eagle carnage, they could start interviewing leaseholders. I know of one case (have documents) where a dead bald eagle was found near a turbine and it was reported by someone that hadn't signed a lease. When agents arrived at the property, the eagle was nowhere to be seen because the leaseholder had already disposed of it.

At some point, if a Shasta County prosecutor wanted to do something similar with Hatchet Ridge, I could help them with a few other ideas.

Wind energy calculations that show 4-5 times less turbine energy actually being produced for the grid

Recently I looked into Wind energy's contribution to an isolated energy grid in Nome, Alaska then compared it to Iowa's glowing Wind energy production numbers.

As I discovered, green energy calculations have very little to do with reality. But by using "Green" energy math methodology and with the help from our politicians, Iowa is able to make claims about producing almost 60% of Iowa's electrical energy from wind.

It's not true, and an analysis of the grid in Nome, Alaska explains why.

11,660 megawatts

Iowa's wind generation capacity of **11,660 megawatts** in 2020 provided just shy of 60% of the state's electricity last year. EC highlighted the need to reach 11,000 megawatts of wind capacity by 2032 to stay on track for a 2050 goal of 100% renewable energy in our publication Iowa's Road to 100% (April 30, 2021).

<https://www.iainvironment.org/newsroom/energy-news>

[Iowa Nears 60% Wind Energy Generation Milestone - Iowa ...](#)

About featured snippets • Feedback

This report from Alaska is extremely interesting because Nome Alaska has a completely isolated electrical grid. In order to survive, the people of Nome have to depend on diesel generators and an intermittent supply of wind energy. By the way, the winds around Nome are considered prime for wind power generation.

ACEP Technical Report

Nome Wind-Diesel System Overview

Chris Pike and Nathan Green

DRAFT Report – November 1, 2017

A report for the Alaska Energy Authority as part of the Renewable Energy Fund
Data Collection and Analysis Effort

Nome, Alaska

Nome has two Wärtsilä 5.4 MW diesel generators, which alternate to supply power. A 3.6 MW Caterpillar generator is used during the off-peak summer hours when demand is low; a 1.8 MW Caterpillar generator is used to augment peak loads during winter afternoons. A 0.4 MW diesel generator is used as a black start unit in case of a black out and can support lower temporary peaking requirements.

Presently, NJUS operates one of the most efficient diesel powerhouses in Alaska, with an average kWh/gal of 15.8 for the period of July 2015 through June 2016, according to power cost equalization (PCE) records.

Initially the Nome wind project consisted of eighteen 50 kW Entegritty turbines. After the full value of the tax credits was realized by Banner Wind LLC, the company sold the Banner Wind project to NJUS along with the long-term lease for the land, effective January 2015. In 2013, two additional 900 kW wind turbines were installed by the utility, using millions in funds from the Alaska Renewable Energy Fund program and a contribution from the local fishing community development quota program, Norton Sound Economic Development Corporation.

Today all of Nome's smaller Entegritty turbines have been shut down due to grid inefficiency and high costs. The project lasted about 10 years but the two larger .9 MW turbines still remain.

Nome Joint Utility System (NJUS) Assistant Manager Ken Morton:

"The cost to maintain the smaller units has increased to the point that the cost of the diesel fuel they displace no longer pencils out."

"NJUS does not at this time have plans to replace the turbines or add additional ones. However, if grant funding becomes available for additional turbines, as well as funds for a battery system that would allow for greater reliance on wind energy, NJUS would pursue that."

In 2021 the Nome Joint Utility System allocated funds to have all their [original 18 turbines](#) to be taken down.

Iowa Wind

So, what does all this have to do with Iowa?

Nome used real world numbers to determine the value and contribution from wind energy for their customers. A 2017 report (see image) said the [actual contribution](#) ("penetration") to Nome's grid in 2015, averaged out to a pitiful 6.3% (see image).

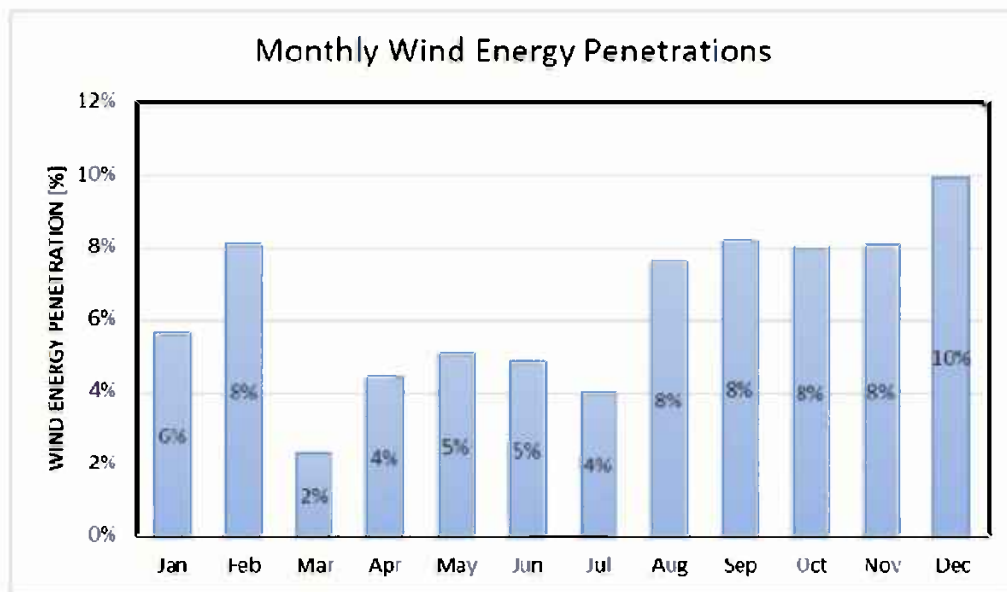


Figure 13. Wind energy penetration by month. To arrive at these figures, the total wind energy fed to the grid each month is divided by the total energy generation each month from all generation sources.

6.3 % yearly average

These are grid numbers and calculations never disclosed from America's other 49 states. The primary reason, Nome's utility district is trying to survive as efficiently as possible while developers and utilities in the other states are busy soaking taxpayers.

Nome Alaska 2015 electric profile

Wind 2.7 MW percentage of nameplate capacity 33%

Diesel 5.4 MW percentage of nameplate capacity 66%

Total 8.1 Wind energy's annual contribution to Nome grid 6.3%

With their baseload diesel generators compared to installed the wind energy nameplate capacity, Nome had an installed diesel to wind 2 to 1.

Iowa's 2020 electric profile

Wind 11,322.5 MW percentage of nameplate capacity 50%

Coal and other sources 11,147.9 MW percentage of nameplate capacity 50%

Total nameplate capacity 22470.4 MW

[Iowa](#) has an installed capacity ratio of about 1 to 1 when their baseload energy sources are compared to installed nameplate wind capacity. Iowa does have a greater

percentage of installed wind capacity than Nome. But if we double Nome's wind energy capacity to equal Iowa's 50% wind mix, the annual contribution Nome's utility would still only achieve about a 12.6% contribution to their grid from wind.

When compared to Nome, Iowa has far more energy transmission losses for wind energy because consumers in Nome are located only 4.5 miles from their wind farm. But assuming all things being equal, including annual wind speeds, Using the same the wind mix/grid penetration calculations from Nome, means that all of Iowa's thousands of turbines, still only contribute about 12-13% of the Iowa's usable energy to the grid.

In a previous post, I said Iowa, grid requirements need constant [base loads](#) of 3000 – 4500 MW. These were old very conservative numbers taken from an Iowa energy site. Today's Iowa's average base load requirements from coal and sources besides wind, are very likely 6500-7000 MW or about 60,000,000 MWh per year.

These energy numbers for Iowa's grid are real and are nowhere to be seen with wind energy reporting. It sure appears that Iowa is using fraudulent wind energy estimates to collect an abundance of Production Tax Credits along with selling regular energy created in fossil fuel plants, as being green.

Iowa's true wind energy value to customers is likely being deliberately overstated between four and five times. The same holds true for every bit of the [EIA](#) wind energy data posted for CA and all other states as well.

In conclusion, this is truly a horrendous industry and the approval of Hatchet Ridge was a monumental mistake by Shasta County Supervisors. For the good of this county, let's hope that Hatchet Ridge is the last wind project to ever be approved in Shasta County.

Jim Wiegand - Lakehead CA

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Additional supporting images shown below:

Iowa Electric Profile (2020 - Including Non-Utility Generation)

ELECTRIC GENERATION IN IOWA BY PRIMARY ENERGY SOURCE	2020 NAMEPLATE CAPACITY (MW)¹	PERCENT OF NAMEPLATE CAPACITY	2020 GENERATION (MWH)²	PERCENT OF GENERATION
Coal	5,754.7	25.61%	14,146,835	23.72%
Wind	11,406.9	50.76%	34,182,302	57.32%
Nuclear	0.0	0.0%	2,904,863	4.87%
Natural Gas	4,215.0	18.76%	7,036,824	11.80%
Hydro	129.2	0.58%	1,025,215	1.72%
Other & Other Renewables	22.0	0.10%	207,440	0.35%
Petroleum	924.2	4.11%	111,111	0.19%
Solar	18.4	0.08%	22,082	0.04%
Total	22,470.4	100.00%³	59,636,672	100.00%³

1	Table 4. Electric power industry capacity by primary energy source, 1990 through 2020						
2	Iowa						
3	megawatts						
4		Year 2020	Year 2019	Year 2018	Year 2017	Year 2016	Year 2015
39	Total electric industry	21,333.2	20,409.5	18,842.2	17,670.8	17,045.5	16,8
40	Battery	1.4	1.1	1.1	-	-	-
41	Coal	5,284.0	5,343.8	5,371.7	5,497.9	5,548.8	6,2
42	Hydroelectric	150.4	146.4	146.4	146.4	144.9	1
43	Natural gas	3,694.7	3,647.1	3,580.7	3,571.1	2,931.8	2,6
44	Natural gas - CC	1,816.2	1,829.0	1,779.8	1,772.6	1,121.1	1,1
45	Natural gas - GT	1,228.4	1,226.8	1,260.4	1,265.7	1,140.3	1,1
46	Natural gas - IC	106.5	96.4	97.2	91.4	92.4	-
47	Natural gas - ST	543.6	494.9	443.3	441.4	578.0	3
48	Nuclear	-	601.4	601.4	601.4	601.4	6
49	Other	-	-	-	-	-	-
50	Other biomass	20.6	20.6	21.4	21.4	21.4	-
51	Petroleum	841.6	851.7	854.0	852.7	1,022.9	1,0
52	Petroleum - GT	204.1	205.3	201.5	202.1	385.9	4
53	Petroleum - IC	605.5	614.4	613.0	618.6	605.0	6
54	Petroleum - ST	32.0	32.0	39.5	32.0	32.0	-
55	Solar	18.0	13.4	8.9	7.7	2.6	-
56	Solar- PV	18.0	13.4	8.9	7.7	2.6	-
57	Wind	11,322.6	9,784.0	8,256.6	6,972.2	6,771.7	6,1
Other biomass includes agricultural byproducts, landfill gas, biogenic municipal solid waste, other biomass (solid, liquid and gas) and sludge w							
Other gases includes blast furnace gas, and other manufactured and waste gases derived from fossil fuels.							
Other includes non-biogenic municipal solid waste, batteries, chemicals, hydrogen, pitch, purchased steam, sulfur, tire-derived fuels, waste							
58	Source: U.S. Energy Information Administration, Form EIA-860, Annual Electric Generator Report.						
59							
<div><div>►</div><div>1. Summary</div><div>2A. Plants-Capacity</div><div>2B. Plants-Generation</div><div>3 Retailers</div><div>4. Capacity</div><div>5</div></div>							

Fake numbers

Table 5. Electric power industry generation by primary energy source, 1990 through 2020

Iowa					
megawatthours					
Total electric industry	59,636,671	61,673,544	63,380,569	57,909,568	54,395,000
Battery	-60	-94	0	.	.
Coal	14,146,835	22,159,203	28,552,999	25,358,230	25,155,000
Hydroelectric	1,025,215	796,268	924,861	1,033,940	910,000
Natural gas	7,036,824	7,684,253	7,340,070	4,567,447	2,960,000
..Natural gas - CC	5,971,857	6,892,269	6,409,135	3,746,433	2,410,000
..Natural gas - GT	479,512	386,174	518,450	343,837	190,000
..Natural gas - IC	2,769	10,192	3,200	12,169	.
..Natural gas - ST	582,687	395,617	409,286	465,008	340,000
Nuclear	2,904,863	5,235,716	4,895,399	5,213,509	4,700,000
Other	0	0	0	2,382	1,000
Other biomass	199,395	203,122	209,177	207,859	250,000
Petroleum	111,111	238,192	110,565	146,719	210,000
..Petroleum - GT	671	101,527	3,049	25,607	40,000
..Petroleum - IC	7,744	9,853	7,610	24,555	10,000
..Petroleum - OTH	24	67	300	0	.
..Petroleum - ST	102,672	126,745	99,606	96,558	90,000
Solar	22,082	15,436	11,456	4,838	.
..Solar- PV	22,082	15,436	11,456	4,838	.
Wind	34,182,302	25,328,971	21,334,067	21,372,752	20,000,000
Wood	8,105	12,478	1,986	1,890	.

Other biomass includes agricultural byproducts, landfill gas, biogenic municipal solid waste, other biomass (solid, liquid and gas) and Other gases includes blast furnace gas, and other manufactured and waste gases derived from fossil fuels.

Other includes non-biogenic municipal solid waste, batteries, chemicals, hydrogen, pitch, purchased steam, sulfur, tire-derived fuels

Note: Totals may not equal sum of components because of independent rounding.

Source: U.S. Energy Information Administration, Form EIA-923, Power Plant Operations Report and predecessor forms.



From: Paul Hellman </O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS /CN=6BBE491255E64F6BB3EEDE982B69B773-PAUL HELLMA>
To: Paul Hellman
CC: James Ross; Adam Pressman; Adam Fieseler
BCC: Tim MacLean; Tim MacLean; Jim Chapin; Donn Walgamuth; patrick@wallnerplumbing.com; skerns7118@aol.com
Sent: 4/11/2022 2:36:18 PM
Subject: Zone Amendment 22-0001 (**Wind Energy Systems Ordinance**)
Attachments: Wind-farms.pdf

Commissioners,

Attached is a comment letter received this afternoon regarding the proposed wind energy systems ordinance (Zone Amendment 22-0001) on this week's agenda. This document contains hyperlinks, all of which work with the exception of the first one on page 4. I will either address the issues contained in this letter during my presentation or in a memo prior to the meeting.

Thanks,

Paul Hellman, Director
Shasta County Department of Resource Management
(530) 225-5114
<https://www.co.shasta.ca.us/index/drm>



North State Climate Action

Dear Commissioners:

My organization, North State Climate Action (NSCA) is a group of volunteers in California's far North State region. Our mission is to **promote solutions addressing the climate crisis through education, collaboration, and action in our communities.** To avoid increasingly dire effects of climate change, including drought, deadly heat waves and worsening fires, we must cease reliance on fossil fuels as quickly as possible with carbon free energy such as wind power. Wind power has the advantages of limiting climate change, improving air quality, and also significantly reducing water demands that fossil fuel power creates. Additionally, wind power technology is still evolving, and future projects may be able to provide environmental mitigations not available today. Please consider the following comments as you evaluate Zone Amendment 22-0001. Ordinance changes proposed in the amendment prohibit all "large" wind power projects in the unincorporated county regardless of specific project details. Don't propose enactment of a blanket prohibition on a viable, clean and renewable power source in Shasta County.

Wild fire potential may be the most contentious issue for siting wind farms. We have arranged our comments to address fire concerns first. Then we discuss each of the impacts that were determined to be significant but unavoidable in the Fountain Wind project, as those issues will be similar in any future wind power proposal. We then discuss the general plan objectives addressed by staff in their report.

Wildfire

The Fountain Wind EIR deemed fire risk less than significant with proposed mitigations. Similar or additional mitigation would be implemented for any new proposed project. Enhanced fire suppression techniques during construction, operation, and decommissioning could be considered for future proposals, such as:

- Greater fuel free buffer zones surrounding roads and towers;
- Enhanced maintenance for wind tower mechanical, electrical and fire suppression equipment;
- Enhanced maintenance of transmission lines including those off site;
- Burying transmission lines;
- Curtailment of turbines during extreme fire conditions;
- Additional removal of flammable debris along off-site roadsides. This was proposed in the Fountain Wind project, but the scope was apparently not considered adequate by the Supervisors;
- Changes in construction materials. In the Hatchet Mountain project, turbine nacelles were constructed of steel, instead of fiber glass, providing enhanced fire protection.

Also note that the access roads and site work in any wind farm project will provide fire breaks, aiding fire suppression, as noted in the Fountain Wind EIR and by Cal Fire.

The wind turbines at Hatchet Mountain have never experienced a fire, and they have been in operation for 12 years. It's estimated by a wind trade organization that a wind tower has only a 1/2000 to 1/15,000 chance of a fire per year. This review estimated chances of fire to be even lower. These estimates include data from many older towers without cutting edge technology such as automatic nacelle fire suppression.

A major concern expressed by the public, commissioners, and supervisors regarding the Fountain Wind project was the difficulty of aerial fire fighting near the turbines, and that's a valid issue. As indicated by Bret Gouvea with CAL FIRE at the October 26 Board of Supervisors meeting, although the difficulty of fire suppression adjacent to a wind tower is an important consideration, these types of decisions are part of the hazards considered in any fire fighting plan. Mr. Gouvea also noted that all firefighting situations are unique. CAL FIRE could have spoken against the Fountain Wind project as proposed, but did not do so. Additionally, the specific layout of wind towers in a project is important in any analysis of aerial firefighting potential. For example, a linear layout of towers similar to the Hatchet Mountain project would likely simplify aerial fire fighting.

With all the mitigation discussed above, the risk of destructive fires is substantially reduced. Not eliminated, which is impossible, but substantially reduced. In accordance with the EIR for Fountain Wind, fire impacts were reduced to less than significant with mitigation (as

noted, mitigation could be enhanced in future projects) and planning staff concurred with that analysis.

Evaluation of wind project benefits should take into account that the potential loss of life from wind power during its construction and operational life is significantly less than from fossil fuel power. [One source](#) indicates that the number of deaths from fossil fuel power generation (due to fuel extraction, transport, refining, construction, distribution and operation) is almost 150 times that of wind power. In accordance with that information, for a project similar to Fountain Wind there is a 50% chance of one death over a 40 year operation period, versus the potential of 69 deaths from fossil fuel power (primarily due to air pollution). Potential deaths from wild fires sparked by wind power would increase the chance of wind farm deaths to a degree, but it's very unlikely to be comparable to fossil fuel power mortality. It's clear that fossil fuel power kills.

Most of the County is in a high or very high potential fire area according to Figure FS-1 of the General Plan (currently outdated according to staff). All construction activities, well as human occupation in those areas, have the potential to ignite fires. That, however, has not led to considering a prohibition of construction of homes and other buildings anywhere in Shasta County. That risk is accepted. If that type of building can continue, why not wind farms with appropriate mitigations? Additionally, since figure FS-1 of the general plan is not current, and the county is working on updating it, these ordinance changes are premature. Also note that Figure FS-1, although outdated, contains limited areas not considered either high or very high fire risk.

Biological Resources.

There is no doubt that wind towers cause bird and bat mortality. Wind projects should be sited properly and be required to minimize bird and other wildlife losses. Impacts to biological resources were thoroughly discussed in the Fountain Wind EIR and any proposed wind farm project would require the same process. Note that climate change presents a much greater potential for individual and species loss than wind farms. [According to the United Nations](#) climate change may contribute to the extinction of 20–30 percent of all species. [According to the Audubon Society](#), "If climate change continues apace, hundreds of North American bird species' ranges will shrink by at least half by 2100."

Both the [Audubon Society](#) and the [American Bird Conservancy](#) support properly sited wind power. State and Federal departments of Fish and Wildlife made no comments on the final Fountain Wind EIR. Future wind projects could be further constrained to provide additional bird and bat protection, as well as other wildlife. Some promising methods for additional bird fatality reduction include [painting of towers, or even painting one blade of the turbine black](#), and [use of radar](#) to detect approaching flocks so turbines can be temporarily shut down. One

objection raised against Fountain Wind was the adequacy the post-construction bird mortality monitoring. That objection could be overcome by expanding such monitoring beyond the 3 years proposed in that project, perhaps for the life of a project. Studies have also been performed using dogs to better spot birds killed in tower collisions. Compensatory mitigation is another option to preserve bird populations. This mitigation could consist of earmarking land not on the wind farm proper as increased habitat for species of concern, or a project to minimize bird mortality from other causes, such as power transmission that is not a part of the proposed project. Lastly, Fountain Wind proposed that individual turbines could be removed if they were shown to cause unacceptable bird mortality. Such a condition could, and should, be included in any future wind farm proposal.

The issue of wildlife protection in wind projects also must be compared to wildlife impacts from fossil fuel power generation that wind can replace. One study estimated that fossil fuel power resulted in the loss of 10-15 times as many birds as wind power, on a per kilowatt-hour basis. This mortality data included older wind farms, which are more likely to cause bird kill than newer towers.

Aesthetics

Aesthetics tends to be a bit subjective, so we are not going into this issue in detail. It should be noted, however, that wild fires exacerbated by climate change will continue to severely impact the beautiful view sheds of the county.

Cultural and Tribal Resources

Similar to other comments above, it's not possible to discuss this issue in detail until there is a project to analyze. Any project in Shasta County could impinge on Native American concerns and cultural resources, but that is not a given, and any necessary mitigation must be site specific.

Additional mitigations regarding this issue were proposed for Fountain Wind after the Planning Commission hearing, including providing access to areas the tribes considered significant to their cultural and religious practices. That same approach, or others, could be investigated if relevant to a new project.

Air Pollution

The EIR found that impacts from PM10 emissions were significant and unavoidable, but recommended that the Planning commission adopt a statement of overriding considerations to allow the project. Future proposed wind farms would likely have similar issues, but the scope of those issues would depend on the size, location, and other specifics of the project.

Compliance with General Plan Objectives as noted in the staff report.

Following are the General Plan Objectives that were discussed in the staff report and thoughts on how those objectives do not necessarily preclude the construction of wind farms in the county.

Objective FS-1 Protect development from wild land and non-wild land fires by requiring new development projects to incorporate effective site and building design measures commensurate with level of potential risk presented by such a hazard and by discouraging and/or preventing development from locating in high risk fire hazard areas.

The county can fulfill this objective by requiring appropriate mitigations specific to each wind project. It's not possible to adequately analyze a project for fire danger, or even whether it is in a very high fire danger zone, until there is a project to consider and fire hazard zones have been updated by the county. Note the objective does not propose a blanket ban on all projects in high fire danger zones in the county, and the benefits of wind power should be considered in fulfilling this objective. And, as noted above, there is no current consideration of preventing development except for wind farms.

Objective SH-1 Protection of the natural scenery along the official scenic highways of Shasta County from new development which would diminish the aesthetic value of the scenic corridor.

The entire county is not a scenic highway. There are many potential wind project areas adequately distant from the County's designated scenic highways to eliminate wind towers from their view shed. Prohibiting wind farms in the entire County due to aesthetic considerations of scenic highways is overkill. The commission may consider prohibiting wind farms within a prescribed distance of scenic highways, but that determination should again be evaluated taking into account the benefits of wind power. As also noted above, if the risk of wildfires due to relentless temperature increases from climate change continues, the scenic resources along these highways are likely to **burn, eliminating a major portion of their scenic value.**

Objective CO-3 To guide development in a pattern that will respect the natural resource values of County lands and their contributions to the County's economic base.

Harvesting of the wind resources of the county, which will contribute substantially to the county's economy, while helping to reduce green house gases and minimize climate change exacerbated wildfires (which degrade the aesthetic resources of the county with acrid smoke and burned timberland), seems to be a good fit for this objective. The Fountain wind project

has economically benefited the county, as noted by former supervisor Moty at the 26 October 2021 Board of Supervisors meeting, and future wind projects could bring similar benefits.

Objective CO-4 To guide development in a pattern that will minimize land use conflicts between adjacent land users.

We can certainly see that placing wind towers at a location where they would dominate the landscape of adjacent property owners could create a conflict. But these potential conflicts must be weighed along with the potential benefits of a wind farm to everyone in the county.


In conclusion, power generated with wind energy benefits everyone in the county, including indigenous populations, due to its mitigation of climate change's deleterious effects, reduction of air pollution and decreased water use. Even if a proposed wind project has significant impacts, impacts and benefits should be considered on a site specific basis to assess whether its benefits override those impacts.

Please do not recommend a blanket prohibition on wind farms in the county,.

Thank you for the work you do and the opportunity to comment on these proposed ordinance changes.

Ron Dykstra

From: Ron Dykstra <dbdykstra@sbcglobal.net>
To: SCPlanning
CC: Paul Hellman; Lio Salazar; NSCA Steer Comm
Sent: 4/11/2022 1:43:10 PM
Subject: Zone Amendment 22-0001 Regulation of Wind Energy Systems County-Wide, Item R3, 14 April meeting
Attachments: Wind-farms.docx; Wind-farms.pdf

 **EXTERNAL SENDER:** Do not follow links or open attachments unless you recognize the sender and know the content is safe.

Attached are the comments of North State Climate Action for the subject item, in both Word and PDF format. If you provide hard copies to the planning commissioners, please also provide an electronic copy, so that the document hyperlinks are usable. Please acknowledge receipt of these comments and notify me of any difficulty you have opening them asap.

Thank you,

Ron Dykstra



North State Climate Action

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From: CAROLE CROWE <carole.crowe@sbcglobal.net>
To: SCPlanning
CC: Paul Hellman; Lio Salazar; NSCA Steer Comm
Sent: 4/12/2022 7:07:28 PM
Subject: Zone Amendment 22-0001 Regulation of Wind Energy Systems County-Wide, Item R3, 14 April meeting

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Shasta County Planning Commissioners,

I believe that Shasta County should continue to consider future wind energy projects. I understand the concerns that have caused the County to dismiss recent wind power projects; however, each project should be evaluated separately. Appropriate mitigation measures should be required to reduce negative impacts. Wind power is a relatively clean energy that can help to reduce our dependence on fossil fuels.

It seems short-sighted to dismiss all large-scale wind energy projects in Shasta County. Please do not adopt Zone Amendment 22-0001.

Thank you for considering my concerns.

Carole Crowe
Redding, CA



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has economically benefited the county, as noted by former supervisor Moty at the 26 October 2021 Board of Supervisors meeting, and future wind projects could bring similar benefits.

Objective CO-4 To guide development in a pattern that will minimize land use conflicts between adjacent land users.

We can certainly see that placing wind towers at a location where they would dominate the landscape of adjacent property owners could create a conflict. But these potential conflicts must be weighed along with the potential benefits of a wind farm to everyone in the county.

In conclusion, power generated with wind energy benefits everyone in the county, including indigenous populations, due to its mitigation of climate change's deleterious effects, reduction of air pollution and decreased water use. Even if a proposed wind project has significant impacts, impacts and benefits should be considered on a site specific basis to assess whether its benefits override those impacts.

Please do not recommend a blanket prohibition on wind farms in the county,.

Thank you for the work you do and the opportunity to comment on these proposed ordinance changes.

Ron Dykstra



Shasta Environmental Alliance

P.O. Box 993777 • Redding, CA 96099 • ecoshasta.org

April 13, 2022

Paul Hellman, Director of Resource Management
Shasta County Planning Commissioners
1855 Placer Street
Redding, CA 96001

RE: REGULATION OF WIND ENERGY SYSTEMS

Dear Mr. Hellman and Shasta County Planning Commissioners

This letter is in reference to the proposed ordinance regarding the regulation of wind energy systems and the draft ordinance that you will be considering on your meeting of April 12, 2022.

First, we want to commend the Planning Commission for your thoughtful consideration and eventual denial of the Fountain Wind Project despite considerable support from construction, real estate and business interests in Shasta County and beyond. Due to fire danger in steep and forested terrain, wildlife habitat issues and the concerns of the Pit River Tribe, we too did not support the project.

We do have serious concerns about the draft ordinance you have before you for the following reasons:

LARGE WIND ENERGY PROJECTS

1. It is too broad, eliminating all of Shasta County from any large scale wind projects because of fire hazards ignores the many other sources of wildfires in Shasta County such as automobiles, both on and off highway; outdoor shooting ranges (BLM land near Keswick Dam has had many), gas powered equipment such as lawnmowers (Jones Fire 1999), and perhaps foremost are PG&E powerlines: arson is another common source of wildfires in Shasta County, including the recent Fawn Fire. The number of wildfires caused by wind farms is extremely small and much less than the threat of fire from the above stated reasons.
2. If wind farms are placed in terrain that is not steep nor heavily forested, aerial firefighting planes could still make fire drops. It would also be much easier to make a fire break.

3. These wind farm projects could be an important source of energy, jobs and taxable income for Shasta County and California.

SMALL SCALE WIND PROJECTS

This section is so limiting that it seems to have been written with the sole purpose of even preventing small scale wind energy from being developed in Shasta County, as if someone has a philosophical opposition to wind energy.

The primary problem with this section of the ordinance is that the height limit is 80 feet. This is way to small to catch higher winds that would make a wind turbine profitable. The Walmart Distribution Center south of Red Bluff near Gerber has a wind turbine that is 265 feet tall and provides 15 to 17% of the center's electricity needs. It has been in operation over 10 years and has not caused any fires to my knowledge. I have driven by this turbine many times and it does not detract from the aesthetics of the area.

Monterey County has allowed wind turbines in the Salinas Valley and a number of them have gone up in the area around Gonzales and Greenfield near Highway 101. The towers are up to 300 feet tall and are placed at the end of row crops in the area. While I enjoy the seeing the Coast Range as I drive up that highway, the wind turbines do not detract from the aesthetics. Plus, they give farming interests extra income from leasing out their land as they do to farmers across the United States. By passing this ordinance you could be denying farmers in the Fall River area the opportunity to supplement their farming income in the future.

With the new federal and state requirements mandating increased renewable energy sources, you would be limiting Shasta County from achieving many of these goals. While I'm sure the Shasta County Attorney's office has reviewed this ordinance for its legality, it seems like this is something that could motivate certain legislators to pass a statewide law banning extremely constrictive ordinances such as this one.

We urge you to reconsider this ordinance, it does not seem to have been thoroughly thought out and needs to be changed as noted above.

Sincerely,



David Ledger, President


From: [SCPlanning](#)
To: [Paul Hellman](#)
Subject: FW: Zone Amendment 22-0001 Comment
Date: Wednesday, April 13, 2022 8:01:48 AM
Attachments: [image001.png](#)

Tracie Huff

Administrative Secretary I
Planning Division
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resourcemanagement@co.shasta.ca.us



From: Doug Mandel [REDACTED]
Sent: April 12, 2022 9:08 PM
To: SCPlanning <scplanning@co.shasta.ca.us>
Subject: Zone Amendment 22-0001 Comment

 **EXTERNAL SENDER:** Do not follow links or open attachments unless you recognize the sender and know the content is safe.

Dear Commissioners:

Power generated with wind energy benefits everyone in the county due to its mitigation of climate change's deleterious effects, reduction of air pollution and decreased water use. Even if a proposed wind project has significant impacts, impacts and benefits should be considered on a site-specific basis to assess whether its benefits override those impacts.

Please do not recommend a blanket prohibition on wind farms in the county.

Sincerely,

Doug Mandel

Redding, CA 96001

From: [SCPlanning](#)
To: [Paul Hellman](#)
Subject: FW: Zone Amendment 22-0001
Date: Thursday, April 14, 2022 7:54:44 AM

Tracie Huff
Administrative Secretary I
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resourcemanagement@co.shasta.ca.us

-----Original Message-----

From: MaryAnn M [REDACTED]
Sent: April 13, 2022 5:13 PM
To: SCPlanning <scplanning@co.shasta.ca.us>
Subject: Zone Amendment 22-0001

EXTERNAL SENDER: Do not follow links or open attachments unless you recognize the sender and know the content is safe.

Shasta County Planning Commissioners: As a citizen of Shasta County since 2005, I am concerned that the proposed Zone Amendment 22-0001 regarding regulation of Wind Energy Systems County-Wide is overly broad and restrictive. There are large areas in Shasta County that are not in a high fire hazard zone. In these areas the most crucial objections to the Fountain Wind Project would have been moot. Also, mitigations for the impacts of wind farms are improving. We do need to reduce our reliance on fossil fuels, that have many negative impacts on the environment and our climate. Please do not commit the error of government over-reach in a County that is predominantly anti-Government already. Thank you.

Sincerely,
MaryAnn McCrary
5136 Bidwell Road
Redding, CA. 96001



April 14, 2022

Shasta County Planning Commission
1855 Placer Street, Suite 103
Redding, CA 96001

Via electronic email

Subject: Proposed Prohibition of Large Wind Energy Systems, Zone Amendment 22-0001)

Dear Chair and Members,

Pattern Energy writes with significant concerns and opposition the proposed amendments to Shasta County's Zoning Code (Zone Amendment 22-0001), prohibiting wind energy systems in unincorporated Shasta County, where they are currently conditionally allowed.

As the owner of Hatchet Ridge Wind Project, Pattern Energy works to bring benefits to Shasta County. Hatchet Ridge Wind expects to generate more than \$30 million over the first 20 years of operations in tax payments benefiting the local region and schools.

The Hatchet Ridge Wind Community Benefits Program invests \$5 million in the local community through the Shasta County General Fund, the Burney-Fall River Education Foundation, and the Burney Regional Community Fund administered by the Community Foundation of the North State.

We want to continue to serve as stewards of the land as we work to provide reliable, low-cost power to Northern Californians, and we pledge to work with you on any future modifications to the project, including a possible repowering.

We understand Shasta County's independence and appreciation for the land and resources it provides to your local communities and hope to work with you in partnership toward a more reliable and affordable power grid.

Sincerely,

Danielle Osborn Mills
Senior Manager, External Affairs
Pattern Energy



California Wind Energy Association

April 14, 2022

Shasta County Planning Commission
1855 Placer St Suite 103
Redding, CA 96001

Via email

Re: Proposed Prohibition of Large Wind Energy Systems

Dear Chair and Members of the Planning Commission:

The California Wind Energy Association (CalWEA)¹ writes with alarm regarding the proposed amendments to Shasta County's zoning code (Zone Amendment 22-0001) that are before you today. If approved, these amendments would prohibit large wind energy systems in almost all areas of unincorporated Shasta County where they are currently conditionally allowed.

CalWEA urges the Planning Commission to reject the proposed amendments outright. At a minimum, the County must prepare an environmental analysis in compliance with the California Environmental Quality Act (CEQA) before considering such amendments.

Wind energy will play a critical role in meeting California's climate change mitigation goals aimed at the root cause of the drought and wildfires that are wreaking havoc in California. A study performed for the California Energy Commission looking at means of achieving California's energy-decarbonization goal² shows that dramatic growth in wind energy will be required to achieve that goal most affordably while ensuring the reliability of the grid.³ The California Public Utilities Commission's resource plan includes over 3,500 megawatts

¹ CalWEA is a 20-year-old trade association representing wind energy and related companies focused on the California market, primarily including owners, operators and developers of wind energy projects located in California and in waters off the California coast.

² SB 100, signed into law in September 2018, establishes as state policy that zero-carbon resources are to supply 100% of California retail sales by December 31, 2045.

³ California Energy Commission, "Deep Decarbonization in a High Renewables Future," at Figure 14. CEC-500-2018-012. June 2018. (Available at: <https://www.energy.ca.gov/2018publications/CEC-500-2018-012/CEC-500-2018-012.pdf>.) This study shows that, absent a large amount of wind energy from within or outside of the state to balance solar resources, decarbonization will come at an added cost of nearly \$20 billion per year. Also see

(MW) of additional wind energy delivered to the Cal-ISO grid by 2025,⁴ a 60 percent increase in the amount of wind energy generation currently operating in California. Realizing the state's clean energy goals, of which in-state wind energy is a critical component, will require counties to recognize, in their planning and permitting decisions, that wind energy projects must be part of the solution to the most pressing environmental problem of our time.

Shasta County's professional planning staff have previously found that two properly designed large wind energy projects are compatible with high-fire-risk lands and are not detrimental to health, safety, and general welfare of neighboring persons. The Hatchett Ridge wind project has been safely operating for over 10 years. At the same time, wind energy projects bring important economic benefits to local communities, including jobs and tax base.

For these reasons, CalWEA urges the Commission to reject the proposed amendments. At a minimum, as explained in a letter submitted to the Commission on this matter by Cox Castle & Nicholson LLP (dated April 13, 2022), the County must prepare environmental review documents in compliance with CEQA before considering this proposal. The collateral impacts on the environment from the proposed amendments could include failure to achieve California's climate change mitigation plans.

Sincerely,



Nancy Rader
Executive Director

⁴ California Public Utilities Commission Decision 22-02-004 at Table 5 (February 10, 2022).

From: [SCPlanning](#)
To: [Paul Hellman](#)
Subject: FW: Wind Farms
Date: Thursday, April 14, 2022 11:51:52 AM
Attachments: [image001.png](#)

Tracie Huff

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resourcemanagement@co.shasta.ca.us



From: Warren Swanson [REDACTED]
Sent: April 14, 2022 10:19 AM
To: SCPlanning <scplanning@co.shasta.ca.us>
Subject: Wind Farms

⚠ EXTERNAL SENDER: Do not follow links or open attachments unless you recognize the sender and know the content is safe.

Planning Commissioners,

I'd like to make a comment on the proposal to ban all windmills from Shasta County. This is a deeply flawed and regressive idea. Shasta County has already received copious amounts of negative press around the country (New York Times, LA Times, SF Chronicle) about our fringe right wing groups. We don't need more articles painting us as a joke hick town (we are not).

Climate change is real and happening faster than predicted.
We need all hands on deck to slow it down and wind power is
one way to do that.

Please do the right thing and reject this ridiculous proposal.

Warren Swanson

3299 Woodbury Dr, Redding, CA 96002



From: [SCPlanning](#)
To: [Paul Hellman](#)
Subject: FW: Wind farms
Date: Tuesday, April 12, 2022 10:01:50 AM

Tracie Huff
Administrative Secretary I
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-----Original Message-----

From: Jeen Wopat [REDACTED]
Sent: April 12, 2022 9:36 AM
To: SCPlanning <scplanning@co.shasta.ca.us>
Subject: Wind farms

EXTERNAL SENDER: Do not follow links or open attachments unless you recognize the sender and know the content is safe.

April 12, 2022

Greetings Shasta County Planning Commissioners,

We request that you NOT support a blanket wind farm prohibition! We prefer that you evaluate each wind farm proposal based on its individual merits.

We appreciate that a blanket prohibition would be perhaps handy from a legislative perspective and administratively save some public dollars, but it would in no way serve our greater need of addressing clean energy challenges as we continue to find our way in an ever-changing climate threat.

Sincerely,
Michael and Linda Wopat
Shasta County residents, homeowners,
and voters

Sent from my iPhone

From: [REDACTED]
To: [SCPlanning](#)
Cc: [Paul Hellman](#); [Lio Salazar](#); [NSCA Steer Comm](#)
Subject: Zone Amendment 22-0001 Regulation of Wind Energy Systems County-Wide, Item R3, 14 April meeting
Date: Tuesday, April 12, 2022 7:08:27 PM

EXTERNAL SENDER: Do not follow links or open attachments unless you recognize the sender and know the content is safe.

Shasta County Planning Commissioners,

I believe that Shasta County should continue to consider future wind energy projects. I understand the concerns that have caused the County to dismiss recent wind power projects; however, each project should be evaluated separately. Appropriate mitigation measures should be required to reduce negative impacts. Wind power is a relatively clean energy that can help to reduce our dependence on fossil fuels.

It seems short-sighted to dismiss all large-scale wind energy projects in Shasta County. Please do not adopt Zone Amendment 22-0001.

Thank you for considering my concerns.

Carole Crowe
Redding, CA

Comments for Planning Commission regarding the prohibition of large wind energy systems within the unincorporated area of Shasta County

I think it's a fantastic idea to prohibit large wind energy systems in Shasta County because these countryside monsters do catch fire on a regular basis. This is a real ongoing threat for all of Shasta County. At some point, it is likely that one of the Hatchet Ridge wind turbines will catch fire, so I hope fire crews will be able to minimize the damage.

People across the world send me videos of turbine fires several times a year. This link shows a recent one.

<https://www.facebook.com/richard.major1/videos/10110297277215878>

But besides the wildfire dangers from wind turbines and infrastructure, there are other very good reasons to forever ban these systems in Shasta County. This industry and our government agencies lie about nearly everything with these energy systems and it's at the expense of the public. Below is new factual information I have put together for Shasta County that I want to be part of the official record.

The Interior Department's New Bald Eagle Take Numbers

America's green energy fraud has been going on for decades and as I have discovered, it never sleeps.

The Interior Department, with fraudulent research and has announced new imaginary bald eagle population estimates of about 317,000 bald eagles, New limits on the number of bald eagles that can be killed by industry each year have been increased to [15,832](#). The previous take limit, also created with fraudulent research, was set in 2016, at [4200 bald eagles](#) annually.

From [Federal Register](#)"Although some of the increase in the estimates of population size from 2009 to 2019 can be attributed to improvements in methods, the majority of the increase is likely due to population growth, estimated to be around 10 percent per year."

Improvements in "methods" really means, continue to ignore real world conditions dismiss the bald eagle habitat abandonment near wind farms like Hatchet Ridge and crank up the rigging for investors.

Not sure if the Interior Departments new eagle population estimates include Alaska or not but the population of [Alaska's bald eagles](#) is about 30,000. Alaska by leaps and bounds, has more bald eagles than any other state. Subtract that number from 316,708 and we are supposed to believe that on average, each of the lower 48 states has a population average of 5,971 bald eagles. In California the bald eagle population doesn't even come close and we might have 1/3 this number, but no more.

Here in Shasta County, CA, we easily have the highest density of bald eagles in the state and the total population including juveniles is about 150. Except for occasional migrants, many of California's 58 counties don't even have bald eagles. My Estimate is that there could be 1500 bald eagles living in CA.

As for Having 5791 bald eagles living in Ca, at some point it could be possible but the turbines killing them off in at Altamont and in the Delta region, would have to be destroyed. As for each of the lower 48 states having an average population of 5,971 bald eagles, it's not possible and in fact, the state of Alaska is the only state with this number of bald eagles.

The Interior Department has lied about the bald eagle population for 48 out of the 49 states with bald eagles. Keep in mind, they also produced a [fake study](#) that overestimated a golden eagle population in central CA by over 10 times.

Green Energy's Hidden Eagle Slaughter

Recently an American wind energy company pleaded guilty to federal criminal charges after at least 150 eagles were killed since 2012. The company has agreed to spend as much as \$27 million on efforts to prevent more deaths.

The company has agreed to spend up to 27 million to prevent more deaths. What good is this? Except for shutting down turbines, there is no way to prevent eagle deaths from wind energy. This industry and the USFWS are very aware of this because wind turbines have been annihilating eagles for decades.

The truth is, these 150 dead eagles are only the tip of the iceberg and very likely represent less than 1% of this ongoing carnage. Back in 1997, when California was the only state with wind turbines in eagle habitat, the Denver Eagle Repository, reported wind turbines being one of their primary sources for their yearly 800 eagle carcasses. When compared to 1997, America now has 80 times more installed wind energy than it did back then 1997. Today, based upon Repository records released up to 2014, the Denver Repository now receives over 3000 eagle carcasses a year.

But with this green energy expansion came a new era of wind turbines. These new turbines invading eagle habitats, were also far more deadly. Early turbines had blade tip speeds that were 110-120 mph while tip speeds for new turbines have speeds twice as fast.

Why doesn't the public know about any of this?

- 1) Wind energy mortality disclosures are not required, scientific research is not required and all wind industry mortality research being conducted, is being staged.
- 2) In 1997, the Clinton Administration created new laws so this ongoing slaughter could be conveniently considered, a business trade secret.
- 3) In 1997, The Freedom of information Act was changed to protect this industry.

4) In 1997, Interior Department personnel were silenced and their employment required non-disclosure agreements with very strict penalties.

5) In 1997, the Denver Eagle Repository was silenced and no longer allowed to discuss the origin of their eagle carcasses.

6) Leaseholders in partnership with wind energy developers are also required to sign very strict non-disclosure agreements. These leaseholders are never allowed to discuss species mortality taking place from the wind turbines on their property. They're also required to immediately dispose of carcasses. Even with post construction mortality research, access by leaseholders and wind energy employees has never been restricted during studies.

6.2.5 Disposal of Animal Carcasses. Owner agrees to take all reasonable measures to avoid attracting scavenging birds and other animals by ensuring all animal carcasses on the Property are immediately (to the extent permitted by applicable law) burned, buried, adequately and completely composted by covering with an adequate amount of earth or mulch, cooked or placed in enclosed containers with lids if such carcasses will be removed at a later time from the Property. Animal carcasses shall not be left in open fields or adjacent to buildings and shall not be left uncovered or exposed.

Since 1997, nobody involved with wind energy and its eagle carcasses, has been allowed to disclose the truth.

Dead Eagle numbers

The Interior Department and USFWS claim that they keep no records for the origin of these eagle carcasses.

An Email I received from USFWS agent Jill Birchell in 2016, confirmed this government protocol of secrecy.

"Hi Jim,

I checked with our repository and learned that they don't keep detailed records of where the eagles they receive come from."

Up to the year 2014, the Repository did report eagle carcasses being received and processed. For 2014 they reported receiving 2309 eagle carcasses for dispersal to American Indians and noted others that had not been counted, which would likely bring totals to about 2400. Since 2014 the numbers of eagle carcasses being processed for the Native Americans is no longer being given out.

NATIONAL EAGLE REPOSITORY ANNUAL REPORT: 10/01/13 – 09/30/14						
REGION	WHOLE EAGLES AND EAGLE PARTS RECEIVED		WHOLE EAGLE ORDERS FILLED	EAGLE FEATHER & PARTS ORDERS FILLED		COMBINED FILLED ORDERS BY REGION
		REGION TOTAL	BALD/GOLDEN	BALD/GOLDEN		
1		239	135	376		511
2		65	479	1,113		1,592
3	Iowa Region	591	129	357		486
4		352	24	114		138
5		229	24	110		134
6		492	170	519		689
7		216	3	13		16
8		125	62	240		302
TOTAL		2,309	1,026	2,842		3,868
NEW REQUESTS RECEIVED						
	BALD EAGLES	1,176	LAST REPOSITORY Report Published			
	GOLDEN EAGLES	1,795				
	EITHER SPECIES	1,379				
	TOTAL	4,350				

NOTES: The incoming bird count is not complete as we are still evaluating birds received in September. The final total number of birds and bird parts received will probably be about 2,400. The total number of eagles and parts shipped, as well as the number of new requests received are complete as of 10/22/14. 2842 "parts" orders due to more eagles hit by turbines now being found more mutilated

But this eagle carcass story doesn't end with just Repository Eagles being processed for American Indians. There are many other carcasses because "clean" eagles are required for ceremonies; eagles that have died as a result of electrocution, vehicle collision, unlawful shooting or trapping, poisoning or from natural causes are unacceptable for ceremonial sacrifice.

In 2014 NBC did a story on the Denver Repository 2014. In this story about recycling eagles to American Indians, the repository reported that they had processed about 42,000 eagle carcasses. This Interior Department facility was opened in 1995.

<https://www.nbcwashington.com/news/local/protecting-eagles-in-life-and-death/1985909/>

In the interview discussing Wildlife Repository Specialist Dennis Wiist, this was revealed ... "But at last count, almost 42,000, he's touched nearly every eagle that's come through this facility."

Add another 8 years of receiving 2500-3000 eagles and about anyone past the eighth grade can come up with an estimate of over 60,000 eagle carcasses since 1995. It's hard to imagine and even harder to stomach, but over 60,000 eagle carcasses have secretly shipped to this repository, with no cause of death or origin given. When Shasta County approved the Hatchet Ridge wind project, this county became a part of this green fraud on America.

If federal prosecutors really wanted prosecute green energy's eagle kills

Even though the USFWS won't report the carcasses it would still be fairly easy to prove what's taking place with America's hidden eagle carnage through indirect means. Sort of like using cell phone tracking data to convict a murderer.

The prosecution of 150 eagles killed since 2012 is nothing to get excited about when nothing has been done about tens of thousands of other eagles killed by wind energy. America's silenced USFWS agents know exactly what's taking place because they process and arrange FedEx overnight shipping for nearly all the eagle carcasses shipped to the Denver Eagle Repository.

If federal prosecutors wanted the truth, a look into FedEx records would give investigators a very good idea what's taken place. From FedEx they would know the origin of shipments, they would see the proof of millions paid out by the US government for overnight shipping and the weight of crates would indicate the number of eagles per shipment. Surveillance on the Repository site in Denver would also clue investigators in on the number of Fed Ex shipments coming in per week.

Another way for prosecutors to get to the truth about green energy's eagle carnage, they could start interviewing leaseholders. I know of one case (have documents) where a dead bald eagle was found near a turbine and it was reported by someone that hadn't signed a lease. When agents arrived at the property, the eagle was nowhere to be seen because the leaseholder had already disposed of it.

At some point, if a Shasta County prosecutor wanted to do something similar with Hatchet Ridge, I could help them with a few other ideas.

Wind energy calculations that show 4-5 times less turbine energy actually being produced for the grid

Recently I looked into Wind energy's contribution to an isolated energy grid in Nome, Alaska then compared it to Iowa's glowing Wind energy production numbers.

As I discovered, green energy calculations have very little to do with reality. But by using "Green" energy math methodology and with the help from our politicians, Iowa is able to make claims about producing almost 60% of Iowa's electrical energy from wind.

It's not true, and an analysis of the grid in Nome, Alaska explains why.

11,660 megawatts

Iowa's wind generation capacity of **11,660 megawatts** in 2020 provided just shy of 60% of the state's electricity last year. EC highlighted the need to reach 11,000 megawatts of wind capacity by 2032 to stay on track for a 2050 goal of 100% renewable energy in our publication Iowa's Road to 100% in April 2021.

<https://www.iainvironment.org/newsroom/energy-news>

[Iowa Nears 60% Wind Energy Generation Milestone - Iowa ...](#)

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This report from Alaska is extremely interesting because Nome Alaska has a completely isolated electrical grid. In order to survive, the people of Nome have to depend on diesel generators and an intermittent supply of wind energy. By the way, the winds around Nome are considered prime for wind power generation.

ACEP Technical Report

Nome Wind-Diesel System Overview

Chris Pike and Nathan Green

DRAFT Report – November 1, 2017

A report for the Alaska Energy Authority as part of the Renewable Energy Fund
Data Collection and Analysis Effort

Nome, Alaska

Nome has two Wärtsilä 5.4 MW diesel generators, which alternate to supply power. A 3.6 MW Caterpillar generator is used during the off-peak summer hours when demand is low; a 1.8 MW Caterpillar generator is used to augment peak loads during winter afternoons. A 0.4 MW diesel generator is used as a black start unit in case of a black out and can support lower temporary peaking requirements.

Presently, NJUS operates one of the most efficient diesel powerhouses in Alaska, with an average kWh/gal of 15.8 for the period of July 2015 through June 2016, according to power cost equalization (PCE) records.

Initially the Nome wind project consisted of eighteen 50 kW Entegritty turbines. After the full value of the tax credits was realized by Banner Wind LLC, the company sold the Banner Wind project to NJUS along with the long-term lease for the land, effective January 2015. In 2013, two additional 900 kW wind turbines were installed by the utility, using millions in funds from the Alaska Renewable Energy Fund program and a contribution from the local fishing community development quota program, Norton Sound Economic Development Corporation.

Today all of Nome's smaller Entegritty turbines have been shut down due to grid inefficiency and high costs. The project lasted about 10 years but the two larger .9 MW turbines still remain.

Nome Joint Utility System (NJUS) Assistant Manager Ken Morton:

"The cost to maintain the smaller units has increased to the point that the cost of the diesel fuel they displace no longer pencils out."

"NJUS does not at this time have plans to replace the turbines or add additional ones. However, if grant funding becomes available for additional turbines, as well as funds for a battery system that would allow for greater reliance on wind energy, NJUS would pursue that."

In 2021 the Nome Joint Utility System allocated funds to have all their [original 18 turbines](#) to be taken down.

Iowa Wind

So, what does all this have to do with Iowa?

Nome used real world numbers to determine the value and contribution from wind energy for their customers. A 2017 report (see image) said the [actual contribution](#) ("penetration") to Nome's grid in 2015, averaged out to a pitiful 6.3% (see image).

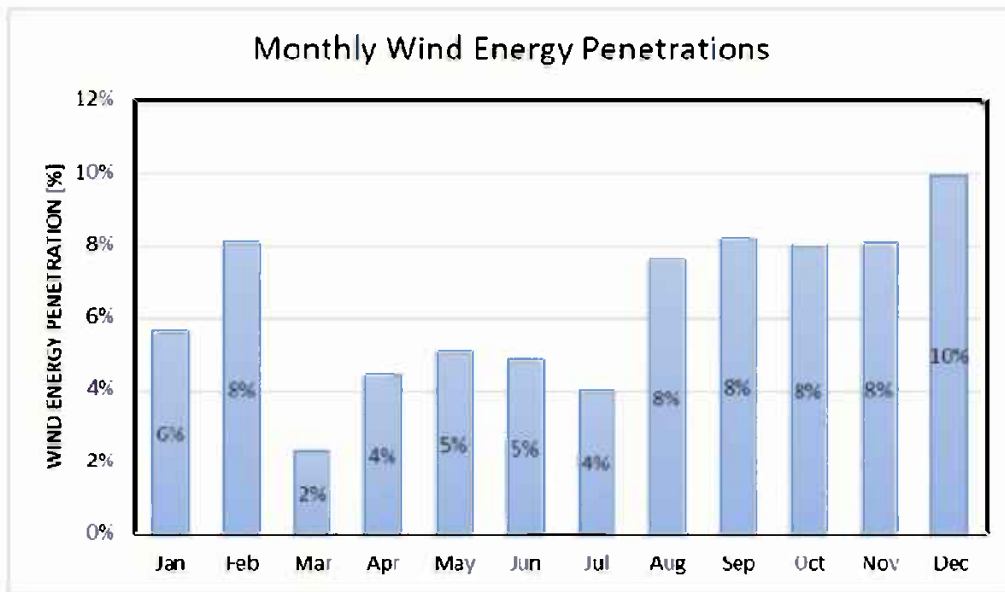


Figure 13. Wind energy penetration by month. To arrive at these figures, the total wind energy fed to the grid each month is divided by the total energy generation each month from all generation sources.

6.3 % yearly average

These are grid numbers and calculations never disclosed from America's other 49 states. The primary reason, Nome's utility district is trying to survive as efficiently as possible while developers and utilities in the other states are busy soaking taxpayers.

Nome Alaska 2015 electric profile

Wind 2.7 MW percentage of nameplate capacity 33%

Diesel 5.4 MW percentage of nameplate capacity 66%

Total 8.1 Wind energy's annual contribution to Nome grid 6.3%

With their baseload diesel generators compared to installed the wind energy nameplate capacity, Nome had an installed diesel to wind 2 to 1.

Iowa's 2020 electric profile

Wind 11,322.5 MW percentage of nameplate capacity 50%

Coal and other sources 11,147.9 MW percentage of nameplate capacity 50%

Total nameplate capacity 22470.4 MW

[Iowa](#) has an installed capacity ratio of about 1 to 1 when their baseload energy sources are compared to installed nameplate wind capacity. Iowa does have a greater

percentage of installed wind capacity than Nome. But if we double Nome's wind energy capacity to equal Iowa's 50% wind mix, the annual contribution Nome's utility would still only achieve about a 12.6% contribution to their grid from wind.

When compared to Nome, Iowa has far more energy transmission losses for wind energy because consumers in Nome are located only 4.5 miles from their wind farm. But assuming all things being equal, including annual wind speeds, Using the same the wind mix/grid penetration calculations from Nome, means that all of Iowa's thousands of turbines, still only contribute about 12-13% of the Iowa's usable energy to the grid.

In a previous post, I said Iowa, grid requirements need constant [base loads](#) of 3000 – 4500 MW. These were old very conservative numbers taken from an Iowa energy site. Today's Iowa's average base load requirements from coal and sources besides wind, are very likely 6500-7000 MW or about 60,000,000 MWh per year.

These energy numbers for Iowa's grid are real and are nowhere to be seen with wind energy reporting. It sure appears that Iowa is using fraudulent wind energy estimates to collect an abundance of Production Tax Credits along with selling regular energy created in fossil fuel plants, as being green.

Iowa's true wind energy value to customers is likely being deliberately overstated between four and five times. The same holds true for every bit of the [EIA](#) wind energy data posted for CA and all other states as well.

In conclusion, this is truly a horrendous industry and the approval of Hatchet Ridge was a monumental mistake by Shasta County Supervisors. For the good of this county, let's hope that Hatchet Ridge is the last wind project to ever be approved in Shasta County.

Jim Wiegand - Lakehead CA

•

Additional supporting images shown below:

Iowa Electric Profile (2020 - Including Non-Utility Generation)

ELECTRIC GENERATION IN IOWA BY PRIMARY ENERGY SOURCE	2020 NAMEPLATE CAPACITY (MW)¹	PERCENT OF NAMEPLATE CAPACITY	2020 GENERATION (MWH)²	PERCENT OF GENERATION
Coal	5,754.7	25.61%	14,146,835	23.72%
Wind	11,406.9	50.76%	34,182,302	57.32%
Nuclear	0.0	0.0%	2,904,863	4.87%
Natural Gas	4,215.0	18.76%	7,036,824	11.80%
Hydro	129.2	0.58%	1,025,215	1.72%
Other & Other Renewables	22.0	0.10%	207,440	0.35%
Petroleum	924.2	4.11%	111,111	0.19%
Solar	18.4	0.08%	22,082	0.04%
Total	22,470.4	100.00%³	59,636,672	100.00%³

Fake numbers

Table 5. Electric power industry generation by primary energy source, 1990 through 2020

Iowa					
megawatthours					
Total electric industry	59,636,671	61,673,544	63,380,569	57,909,568	54,395,000
Battery	-60	-94	0	.	.
Coal	14,146,835	22,159,203	28,552,999	25,358,230	25,155,000
Hydroelectric	1,025,215	796,268	924,861	1,033,940	910,000
Natural gas	7,036,824	7,684,253	7,340,070	4,567,447	2,960,000
..Natural gas - CC	5,971,857	6,892,269	6,409,135	3,746,433	2,410,000
..Natural gas - GT	479,512	386,174	518,450	343,837	190,000
..Natural gas - IC	2,769	10,192	3,200	12,169	.
..Natural gas - ST	582,687	395,617	409,286	465,008	340,000
Nuclear	2,904,863	5,235,716	4,895,399	5,213,509	4,700,000
Other	0	0	0	2,382	1,000
Other biomass	199,395	203,122	209,177	207,859	250,000
Petroleum	111,111	238,192	110,565	146,719	210,000
..Petroleum - GT	671	101,527	3,049	25,607	40,000
..Petroleum - IC	7,744	9,853	7,610	24,555	10,000
..Petroleum - OTH	24	67	300	0	.
..Petroleum - ST	102,672	126,745	99,606	96,558	90,000
Solar	22,082	15,436	11,456	4,838	.
..Solar- PV	22,082	15,436	11,456	4,838	.
Wind	34,182,302	25,328,971	21,334,057	21,372,752	20,000,000
Wood	8,105	12,478	1,986	1,890	.

Other biomass includes agricultural byproducts, landfill gas, biogenic municipal solid waste, other biomass (solid, liquid and gas) and Other gases includes blast furnace gas, and other manufactured and waste gases derived from fossil fuels.

Other includes non-biogenic municipal solid waste, batteries, chemicals, hydrogen, pitch, purchased steam, sulfur, tire-derived fuels

Note: Totals may not equal sum of components because of independent rounding.

Source: U.S. Energy Information Administration, Form EIA-923, Power Plant Operations Report and predecessor forms.



April 13, 2022

Shasta County Planning Commission
1855 Placer St Suite 103,
Redding, CA 96001

*Re: Proposed Amendments to Shasta County Zoning Code to Prohibit Large Wind
Energy Systems*

Dear Chair and Members of the Planning Commission:

This firm represents ConnectGen LLC. ConnectGen LLC is a leading developer of renewable energy with projects throughout the United States. I am writing about the proposed amendments to Shasta County's zoning code (Zone Amendment 22-0001) which, if approved, would prohibit "private wind energy production systems not classified as small wind energy systems" (also referred to as "large wind energy systems") in almost all areas of unincorporated Shasta County. The Planning Commission is scheduled to hear this item at its April 14, 2022 regularly scheduled meeting.

Poor Public Policy. There are compelling policy reasons why Shasta County should not adopt the proposed zoning code amendments:

- Large wind energy systems can safely and compatibly be developed in Shasta County, including in areas of high fire risk.
- Shasta County 's professional planning staff recommended approval of both the Hatchett Ridge and Fountain Wind Project because they determined, based on substantial and highly credible evidence that, properly designed and mitigated, large wind energy systems are compatible with high fire risk lands and are not detrimental to health, safety, peace, morals, comfort and general welfare of persons residing or working in the neighborhood or be detrimental or injurious to property or improvements in the neighborhood or to the general welfare of the County.
- No wildfires have resulted from the construction and operation of the Hatchett Ridge project, which has been operational for over 10 years. There is simply no basis to conclude that other wind projects will cause wildfires.
- Small wind energy systems do not supply electricity to the retail market and do appreciably reduce carbon emissions on regional or statewide scale
- Large wind energy systems are a critical part of how California plans to address climate change, which will help reduce wildfire risk.

- Electricity produced from large wind energy systems displaces carbon emissions from fossil fuel power plants.
- Large wind energy systems create jobs and substantial tax benefits for Shasta County.
- Under the existing zoning code, the County can already carefully consider individual large wind energy systems on their merits through the conditional use permit process.

Violation of CEQA. In addition to these policy reasons, there are legal reasons the County should not proceed with the proposed amendments. Based on the current record, adoption of these zoning changes without environmental review would violate the California Environmental Quality Act (CEQA), Public Resources Code section 21100 et seq. Unless a project is exempt, CEQA requires an agency to conduct an environmental review to determine whether a project may have a significant effect on the environment. *Muzzy Ranch Co. v. Solano County Airport Land Use Commission* (2007) 41 Cal. App. 4th 372 at 380-381.) A "[s]ignificant effect on the environment" means a substantial, or potentially substantial, *adverse change in the environment*." Public Resources Code section 21068, italics added.) The Guidelines define "[s]ignificant effect on the environment" as "a substantial, or potentially substantial, *adverse change* in any of the physical conditions within the area affected by the project including land [and] . . . flora" (Guidelines, § 15382, italics added.)

Draft Resolution 2022-013 claims that Zone Amendment 22-0001 is exempt pursuant to CEQA Guidelines sections 15060(c)(2) since "it can be seen with certainty that this ordinance will not result in a direct or reasonably foreseeable indirect physical change in the environment." But this exemption -- known as the "common sense exemption" -- does not apply here for the reasons stated below. Before it can approve these amendments, the County is therefore required to prepare an environmental document in compliance with CEQA.¹

In its entirety, CEQA Guidelines section 15061, subdivision (b)(3) provides: "(b) A project is exempt from CEQA if: [¶] . . . [¶] (3) The activity is covered by the general rule that CEQA applies only to projects which have the potential for causing a significant effect on the environment. Where it can be seen with certainty that there is no possibility that the activity in question may have a significant effect on the environment, the activity is not subject to CEQA."

The common sense exemption can be relied on only if a factual evaluation of the agency's proposed activity reveals that it applies. *Davidon Homes vs City of San Jose* (1997) 54 Cal. App. 4th 106 at 114. The agency invoking the exemption has the burden of demonstrating that it applies. *Id.* at p. 116. Further, it applies only when it is *undisputed* that a project will enhance rather than degrade existing environmental conditions. *CREED-21 v. City of San Diego* (215) 234 Cal. App. 4th 488, 512.

As recognized by the leading treatise on CEQA (see Kostka & Zischke, *Practice under the Environmental Quality Act*, CEB, section 5.112) certain projects ostensibly adopted to protect or

¹ As a threshold matter, the proposed amendment of the zoning ordinance clearly constitutes a "project" subject to CEQA. The staff report makes no argument that the amendment is not a project and immediately addresses the second tier of analysis—whether the project is exempt from CEQA under the commonsense exemption.

improve the environment can have collateral effects on the environment that preclude application of the exemption. As a result, agencies cannot simply assume that measures intended to protect the environment are entirely benign. For example, the court in *Dunn-Edwards Corp. v. Bay Area Air Quality Management District* (1992) 9 Cal. App. 4th 644 overturned amendments to air district regulations designed to reduce the amount of volatile organic carbons (VOCs) in paint and other architectural coatings for failure to comply with CEQA. Because there was evidence that the new regulations would require lower quality products that would result in a net increase in VOC emissions, an exemption under 14 Cal Code Regs §15061(b)(3) was held to be improper. See also *Muzzy Ranch Co. v. Solano County Airport Land Use Commission*, supra, 41 Cal. App. 4th 372 at 380-381 (displacement of development pressure can be environmental impact, but common sense exemption applied to airport land use plan but chiefly because it kept preexisting designations in place); *Wildlife Alive v. Chickering* (1976) 18 Cal. 3d 190 (Fish and Game Commission action setting fishing and hunting seasons has potential for both beneficial and adverse effects on survival of certain species); *Building Code Action v. Energy Resources Conserv. & Dev. Comm'n* (1980) 102 CA 3d 577 (adoption of energy conservation regulations establishing double-glazing standards for new residential construction could have significant impact on air quality as result of increased glass production).

Here, the County's zoning code currently allows wind energy generation projects as a "public utility" in any zoning district with a conditional use permit. As in the *Dunn-Edwards* case and in stark contrast to the *Muzzy Ranch* case (which merely maintained existing zoning regulations and did not change them), the amendments here propose a prohibition on large scale wind energy in the vast majority of the unincorporated area of Shasta County where they are currently conditionally allowed. Draft Resolution 2022-013 defends the application of the common sense exemption on the ground that the prohibition would potentially educe wildfire risk and reduce biological and other impacts *in the County*. However, the Resolution fails to address or acknowledge the indirect but very real adverse regional and statewide impacts of precluding the potential development of approximately 2012 MW of emissions-free wind energy in Shasta County.² Precluding the development of these wind energy projects could result in a lost opportunity to displace 2,143,241 metric tons of CO₂ per year, the equivalent of removing 461,802 gasoline powered passenger vehicles driven for one year³ from the road as well as thwart the California Public Utility Commission's Adopted Plan for procurement of approximately 3500 MW of on-shore wind by 2025. This prohibition would also thwart the State of California's goals contained in SB 100 requiring renewable energy and zero-carbon resources to supply 100% of electric retail sales to end use customers by 2045. It would also undermine the state's goal of reducing GHG emissions by 40% by 2030 compared to 1990 levels under AB 32. A prohibition on all large wind energy systems in Shasta County would also undermine the Shasta County Air Quality Management District's Regional Climate Action Plan

² This figure is derived from the number of acres of private land in the unincorporated part of the County where wind speed would be commercial (above 6 m/s) based on California Energy Commission and National Renewable Energy Laboratories wind maps, then assuming 80 acres per MW.

³ <https://www.epa.gov/energy/greenhouse-gas-equivalencies-calculator>

which reduce community GHG emissions to 49% below 2008 levels by 2035 (i.e. 291,340 MT CO₂e/yr.) This loss of clean electricity from large wind energy systems that could be produced in Shasta County could lead to higher levels of carbon emissions for a longer period, a diminished capacity to slow global warming and potentially higher risk of wildfires. Furthermore, the conclusion that the prohibition would potentially reduce wildfire risk ignores the record from the Fountain Wind conditional use permit which demonstrated that project actually enhanced the fire safety in the area of the project. The record also demonstrated that any impacts to wildlife would be mitigated under CEQA and applicable state and federal laws.

Given these potential results, it is abundantly clear that it *cannot* be seen *with certainty* that there is *no possibility* that the proposed amendments to the zoning code may have a significant effect on the environment. To the contrary, the proposed amendments *quite possibly* may have an adverse impact on the state's ability to address climate change, fight wildfires and reduce carbon emissions, all of which could result in significant adverse impacts on the environment. As such, the common sense exemption does not apply and the County must prepare an environmental analysis in compliance with CEQA before approving such amendments.

Inconsistent with the General Plan. Approval of these amendments would also be in violation of state planning law requiring that the zoning code be consistent with the General Plan. Shasta County's General Plan recognizes that renewable energy, including wind energy, are important features in the County's energy future. An outright prohibition on large wind energy systems would be inconsistent with the stated importance of renewable energy, including wind energy in the County's General Plan:

"Renewable energy resources, coupled with strategies to encourage conservation, are important features in the Shasta County region's energy future. In 2002, the Governor signed the Renewable Portfolio Standard (RPS), SB 1078. This standard requires an annual increase in renewable generation equivalent to at least 1 percent of electricity sales, with an aggregate goal of 20 percent by 2017. Currently renewable generation accounts for 11 percent of retail sales. California's Energy Action Plan has targeted a goal of 20 percent by 2010. 21 Achieving the RPS could displace 20,000 tons of nitrogen oxide (Nox) emissions from gas and coal-fired generation in the Western states over the 2004-2013 time frame. Also, the use of renewable resources can reduce carbon dioxide and greenhouse gas emissions associated with global climate change. Generation of electricity from renewable energy rather than by fossil fuels can reduce CO₂ and other green-house gas emissions associated with climate change. Model simulations in one instance indicate that achieving the RPS by 2010 could reduce annual CO₂ emissions by about 62 million tons by 2013. This is equivalent to estimated annual CO₂ emissions from more than 6 million automobiles. Geothermal energy provides the largest portion of renewable electricity in California where such generation is by systems 30 MW or smaller. Renewable energy (excluding small and large hydropower) provided four percent for the region's energy production in the Western Electricity Coordinating Council (WECC) states. If renewable energy could be used to replace the estimated growth in gas-fired generation from 2004- 2017, the total amount of

renewable energy by 2017 would reach about 38 percent. This would make renewable energy the largest source of electricity generation in California. Overall, existing renewable energy facilities utilize a small proportion of the technical potential for renewable energy in California.

Important renewable energy sources in Shasta County include solar, hydroelectricity, biomass, and cogeneration. There is also potential for development of wind, geothermal, and waste-to-energy as alternative sources of energy production. Technology improvements associated with renewable energy development will be a key to its rate of success. Renewable energy sources can be most effectively applied for space heating and cooling and for electrical generation. For the oil dependent transportation sector, renewable energy solutions involve developing marketable alternative fuel types as the cost of oil rises. Collectively, renewable energy offers a diverse and virtually inexhaustible resource, opportunities for developing new base industries, and all at substantially less environmental cost.


Conclusion: The proposal to prohibit all large wind energy systems in almost all of Shasta County based on the common sense exemption would violate CEQA, be poor public policy, and violate state planning and zoning laws requiring consistency with the General Plan. The County already has the ability to use its discretion to allow or disallow specific projects under the conditional use process. For all of the above reasons, we urge the Planning Commission to reject the proposed amendments.


Very truly yours,



Anne E. Mudge

From: Jim@JimWiegand.com
To: Shasta County BOS
CC: Joe Chimenti; Mary Rickert; Timothy Garman; Patrick Jones; Les Baugh
Sent: 4/13/2022 12:06:13 PM
Subject: Please read over these comments before 4/14 meeting
Attachments: supervisors meeting 4.14.pdf

 **EXTERNAL SENDER:** Do not follow links or open attachments unless you recognize the sender and know the content is safe.

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PLANNING COMMISSION

1855 Placer Street, Suite 103
Redding, California 96001
(530) 225-5532
(530) 245-6468 FAX

Commissioner James Chapin, District 1
Commissioner Tim MacLean, District 2
Commissioner Steven Kerns, District 3
Commissioner Donn Walgamuth, District 4
Commissioner Patrick Wallner, District 5

AGENDA

REGULAR MEETING OF THE

SHASTA COUNTY PLANNING COMMISSION

Thursday, May 12, 2022, 2:00 p.m.

In addition to this Regular Meeting, the Planning Commission welcomes you to its regularly scheduled meetings which are scheduled for the second Thursday of each month at 2:00 p.m. in the Board of Supervisors Chambers on the second floor of the Shasta County Administration Center, 1450 Court Street, Suite 263, Redding, California.

TO ADDRESS THE COMMISSION: Members of the public may directly address the Planning Commission on any agenda item on the regular calendar before or during the Commission's consideration of the item. In addition, the Planning Commission provides the members of the public with a Public Comment-Open Time period, where the public may address the Commission on any agenda item and may address the Commission on any matter not listed on the agenda that is within the subject matter jurisdiction of the Planning Commission. Pursuant to the Brown Act (Govt. Code section 54950, et seq.), **Commission action or discussion cannot be taken** on non-agenda matters, but the Commission may briefly respond to statements or questions and, if deemed necessary, refer the subject matter to the appropriate department for follow-up and/or to schedule the matter on a subsequent Commission agenda.

PRESENTATION OF DOCUMENTS: All items presented to the Planning Commission during a public hearing, including but not limited to letters, e-mails, petitions, photos, maps or other kinds of information shall become a permanent part of the record and must be submitted to the clerk of the commission. It is advised that the presenter create copies in advance for their own records. If you have documents to present for the members of the Planning Commission to review, please provide a minimum of eight copies.

The Planning Commission's decision on any noticed public hearing item may be appealed to the Board of Supervisors. See "Notes" at the end of the regular agenda.

CALL TO ORDER

Pledge of Allegiance
Roll Call

PUBLIC COMMENT PERIOD - OPEN TIME

During the Public Comment - Open Time period, members of the public may address the Planning Commission on any matter not listed on the agenda that is within the subject matter jurisdiction of the Planning Commission.

PLANNING DIRECTOR'S REPORT

REGULAR CALENDAR

R1 Approval of Minutes:

Approve the minutes of the meetings held on April 6, 2022 and April 14, 2022 as submitted.

- R2 Use Permit 22-0003 (Dickinson) – Continued from April 14, 2022:** Kevin and Danielle Dickinson have requested a use permit to legalize an existing Recreational Vehicle (RV) repair shop, installation services, RV sales, outdoor RV and trailer storage, and to construct a 2,560-square-foot RV repair structure, landscaping, and other ancillary onsite improvements. The 0.77-acre project site is located at 18691 Old Oasis Road, Redding, CA 96003 (Assessor's Parcel Number 074-100-030), on the east side of Old Oasis Road, approximately 0.18 miles south of the intersection of Oasis Road and Old Oasis Road. Staff Planner: Elisabeth Towers / Supervisor District: 1 / Proposed CEQA Determination: Exempt. Staff recommends that the Planning Commission:

1. Continue the item to the regularly scheduled June 9, 2022 Planning Commission hearing.

- R3 Use Permit 20-0008 (Compton):** Sonny Compton has requested a use permit to use an existing 720-square-foot commercial building and fenced outdoor area as a garden supply retail store that would be served by nonconforming off-street parking. The request includes exceptions from the landscaping requirements of the Shasta County Code. The project is located on a 0.36-acre property on the north side of State Hwy 299 E, at the northwest corner of State Highway 299 E and Round Mountain Road at 29430 State Hwy 299 E, Round Mountain, CA 96084 (Assessor's Parcel Number 029-430-004). Staff Planner: Luis Topete / Supervisor District: 3 / Proposed CEQA Determination: Exempt. Staff recommends that the Planning Commission:

1. Conduct a public hearing.
2. Close the public hearing.
3. Adopt a resolution to: a) find that Use Permit 20-0008 is exempt from the California Environmental Quality Act (CEQA) pursuant to State CEQA Guidelines sections 15061(b)(3) and 15301; b) adopt the recommended findings listed in Resolution 2022-012, including modifications, if any, as determined by the Planning Commission; and c) approve Use Permit 20-0008, based on the recommended findings and subject to the conditions of approval set forth in Exhibit A to Resolution 2022-012, including modifications, if any, as determined by the Planning Commission.

- R4 Amendment 21-0003 (Lehigh Cement West, Inc):** Lehigh Cement West, Inc. has requested approval of Amendment 21-0003 to amend Use Permit 297-78 for the construction of a Fortera™ ReCarb™ Plant. The Fortera™ ReCarb™ process is a proprietary process that will utilize a portion of the carbon dioxide (CO₂) emissions from the existing Lehigh cement kiln stack as feedstock to produce a Fortera proprietary patented product called Reactive Calcium Carbonate (RCC). The facility would produce approximately 15,000 tons of RCC over a time span of approximately 1.5 years and would then be decommissioned. This facility would not increase the production of the existing cement plant but would operate as a separate, temporary facility. The facility would be constructed within the existing facility boundary of Assessor's Parcel Number 307-030-002 located along the southwest border of the parcel. Consistent with the existing site, the facility would operate 24 hours per day, 7 days per week. Access to the facility site would be through the existing main gate of the Lehigh site located along Wonderland Boulevard. The plant includes structures that exceed the Mineral Resource (MR) zone district's 45-foot structural height limit. The project is located approximately 2 miles north of the intersection of

Interstate 5 and Old Oregon Trail on the west side of Wonderland Boulevard in the Mountain Gate area at 15390 Wonderland Boulevard, Redding, CA 96003 (Assessor's Parcel Numbers 307-020-002 and 307-030-002). Staff Planner: Luis A. Topete / Supervisor District: 4 / Proposed CEQA Determination: Mitigated Negative Declaration. Staff recommends that the Planning Commission:

1. Conduct a public hearing.
2. Close the public hearing.
3. Adopt a resolution to: a) adopt the California Environmental Quality Act (CEQA) determination of a Mitigated Negative Declaration; b) adopt the recommended findings listed in Resolution 2022-013, including modifications, if any, as determined by the Planning Commission; and c) approve Amendment 21-0003, based on the recommended findings and subject to the conditions of approval set forth in Exhibit A to Resolution 2022-013, including modifications, if any, as determined by the Planning Commission.

R5 Zone Amendment 22-0001 Regulation of Wind Energy Systems County-Wide Text Amendment (Shasta County) – Continued from April 14, 2022:

The Planning Commission will hold a public hearing to consider recommending that the Board of Supervisors adopt an ordinance amending Title 17, Zoning Plan, of the Shasta County Code (SCC) by adding SCC Section 17.88.335 to define and prohibit large wind energy systems within the unincorporated area of Shasta County, amending SCC Section 17.88.035 to modify the definition of, and development regulations for, small wind energy systems, and amending SCC Section 17.88.100 to exclude large wind energy systems from being a permissible public utility with the approval of a use permit. Staff Planner: Paul Hellman. Staff recommends that the Planning Commission:

1. Pursuant to a motion passed by the Planning Commission on April 14, 2022, open the public hearing for this continued item.
2. Close the public hearing.
3. Adopt a resolution recommending that the Shasta County Board of Supervisors: a) find that Zone Amendment 22-0001 is not subject to the California Environmental Quality Act (CEQA) for the reasons stated in Resolution 2022-014; b) adopt the recommended findings listed in Resolution 2022-014, including modifications, if any, as determined by the Planning Commission; and c) introduce, waive the reading of, and enact an ordinance to amend the Zoning Plan of the County of Shasta identified as Zone Amendment 22-0001, including modifications, if any, as determined by the Planning Commission.

R6 Appeal of Administrative Permit 21-0055 (Kelley): William Kelley has requested approval of Administrative Permit 21-0055 to exceed the total combined residential accessory structure floor area limit of 2,500 square feet and the 20-foot height limit for accessory buildings within 50 feet of a property line for a proposed 2,080-square-foot, 25-foot-7-inch-tall RV garage located 31 feet from the north property line. The Director of Resource Management, after considering public comments and finding that the proposal meets all applicable criteria, approved Administrative Permit 21-0055 on April 19, 2022. Timely appeals of the Director's decision were filed by Mario Callegari and Jonathan Mulieri. The 2-acre project site is located at 20570 Chipeta Way, Redding, CA 96003 (Assessor's Parcel Number 306-640-001), on the east side of Bear Mountain Road, approximately 0.13 miles east of the intersection of Chipeta Way and Bear Mountain Road. Staff Planner: Jonathan Muller / Supervisor District: 4 / Proposed CEQA Determination: Exempt. Staff recommends that the Planning Commission:

1. Conduct a public hearing.
2. Close the public hearing.

3. Adopt a resolution to: a) deny the appeal of the Director of Resource Management's approval of Administrative Permit 21-0055 filed by Mario Callegari; b) deny the appeal of the Director of Resource Management's approval of Administrative Permit 21-0055 filed by Jonathan Mulieri; c) find that Administrative Permit 21-0055 is exempt from the California Environmental Quality Act (CEQA) pursuant to State CEQA Guidelines section 15303; and d) approve Administrative Permit 21-0055, based on the recommended findings and subject to the conditions of approval set forth in Exhibit A to Resolution 2022-015, including modifications, if any, as determined by the Planning Commission.

ADJOURN

NOTES:

1. The Planning Commission, at their discretion, may limit individual/group testimony time in the interest of facilitating the meeting to allow all persons who wish to comment the opportunity to do so.
2. Documents associated with the agenda are on file and available for review. The agenda, initial studies, staff reports, and minutes, can be found online at www.co.shasta.ca.us/drm/planning/planning-commission-meetings. Direct inquiries to: Department of Resource Management - Planning Division, 1855 Placer Street, Suite 103, Redding, CA 96001. Phone: (530) 225-5532.
3. Commission actions on tentative maps, use permits, variances, administrative permits, and zoning permits are final unless appealed to the Board of Supervisors. Appeals are subject to fees and filing deadlines. Appeal periods: tentative map, 10 calendar days; use permits, variances, administrative permits, and zoning permits, 5 calendar days. The notice of appeal shall identify, by application number, the action which is the subject of the appeal; shall state the action, finding or determination, and the date thereof, from which the appeal is taken; and shall specifically set forth the grounds upon which the appeal is based. No person wishing to appeal a decision of the Planning Commission should rely on an appeal filed by another person but instead should file their own separate appeal. No appeal shall be deemed to be filed unless any required fee is submitted to the clerk with the notice of appeal. Forms and instructions for filing appeals are available from the Clerk of the Board of Supervisors at 1450 Court Street, Suite 308B, Redding.
4. The Commission's action on Zoning applications establishes the next action. When the Commission recommends approval, the application is automatically scheduled for action by the Board of Supervisors; if the Commission denies the application, the application is not scheduled for Board action unless an interested party files a written request for such consideration. Fees and filing information are available from the Clerk of the Board of Supervisors or from the Planning Division.
5. Following Planning Commission action on a proposed General Plan Amendment any interested party may file a written request for a hearing by the legislative body on the Commission's recommendation by filing such a request with the Clerk of the Board of Supervisors within five calendar days after the Commission action.
6. If you challenge a Planning Commission action in court, you may be limited to raising only those issues you or someone else raised at the public hearing described in this agenda, or in written correspondence delivered to the Planning Commission at, or prior to, the public hearing.
7. The County of Shasta does not discriminate on the basis of disability in admission to, access to, or operation of its buildings, facilities, programs, services, or activities. The County does not discriminate on the basis of disability in its hiring or employment practices. Questions, complaints, or requests for additional information regarding the Americans with Disabilities Act (ADA) may be forwarded to the County's ADA Coordinator: Director of Support Services Shelley Forbes, County of Shasta, 1450 Court Street, Room 348, Redding, CA 96001-1676, Phone:(530) 225-5515, California Relay Service: (800) 735-2922, Fax: (530) 225-5345, E-mail: adaordinator@co.shasta.ca.us.

Individuals with disabilities who need auxiliary aids and/or services for effective communication in the County's programs and services are invited to make their needs and preferences known to the affected department or the ADA Coordinator. For aids or services needed for effective communication during Planning Commission meetings, please call the Department of Resource Management (530) 225-5532 five (5) business days before the meeting. This notice is available in accessible alternate formats from the affected department or the ADA Coordinator. Accommodations may include, but are not limited to, interpreters, assistive listening devices, accessible seating, or documentation in an alternate format.

REPORT TO THE SHASTA COUNTY PLANNING COMMISSION

<u>PROJECT IDENTIFICATION:</u> <u>REGULAR AGENDA</u>	MEETING DATE	AGENDA ITEM #
ZONE AMENDMENT 22-0001 REGULATION OF WIND ENERGY SYSTEMS COUNTY-WIDE (ZONING TEXT AMENDMENT)	5/12/22	R5

RECOMMENDATION: That the Planning Commission:

1. Pursuant to a motion passed by the Planning Commission on April 14, 2022, open the public hearing for this continued item.
2. Close the public hearing.
3. Adopt a resolution recommending that the Shasta County Board of Supervisors: a) find that Zone Amendment 22-0001 is not subject to the California Environmental Quality Act (CEQA) for the reasons stated in Resolution 2022-014; b) adopt the recommended findings listed in Resolution 2022-014; and c) introduce, waive the reading of, and enact an ordinance to amend the Zoning Plan of the County of Shasta identified as Zone Amendment 22-0001.

BACKGROUND AND DISCUSSION:

On April 14, 2022, the Planning Commission conducted a public hearing and continued this item to May 12, 2022 to enable staff to review and provide a written response to the attached letter from Anne E. Mudge of Cox, Castle & Nicholson LLP on behalf of ConnectGen LLC dated April 13, 2022. This letter alleges that the proposed amendments to the Zoning Plan are not exempt from the California Environmental Quality Act (CEQA) and that the County must prepare an environmental document in compliance with CEQA before approving the proposed amendments. Staff's response to this letter is provided below under "Environmental Determination." Additional public comments received to date are also attached to this staff report.

On January 13, 2022, the Planning Commission adopted attached Resolution No. 2022-003, a resolution of intention to consider amendments to the Shasta County Zoning Plan regulating large wind energy systems in the unincorporated area of Shasta County. In this resolution, the Planning Commission found that:

- The Shasta County Zoning Plan regulates small wind energy systems, which are defined as wind energy conversion systems consisting of a wind turbine, a tower, and associated control or conversion electronics used primarily to reduce on-site consumption of utility power.
- Private wind energy production systems not classified as small wind energy systems are regulated by the Zoning Plan as public utilities, which are permissible in all zone districts with the approval of a use permit.
- The adverse impacts of private wind energy production systems not classified as small wind energy systems, particularly with respect to wildfire, aerial firefighting, aesthetics, biological resources, and historical, cultural, and tribal resources, are of significant concern to many residents of Shasta County as evidenced by the numerous public comments received regarding the proposed Fountain Wind Project between 2019 and 2021.
- The vast majority of the unincorporated area of Shasta County is designated as being in the High and Very High Fire Hazard Severity Zones as recommended by the California Department of Forestry and Fire Protection.
- The Shasta County Planning Commission is of the opinion that private wind energy production systems not classified as small wind energy systems are incompatible in the High and Very High Fire Hazard Severity Zones.
- Amendments to the Zoning Plan to define and regulate private wind energy production systems not

classified as small wind energy systems in the unincorporated area of Shasta County, should be considered, in furtherance of the public necessity, convenience, and general welfare.

Through the resolution of intention, the Planning Commission directed the Department of Resource Management to propose amendments to the Shasta County Zoning Plan defining private wind energy systems not classified as small wind energy systems as large wind energy systems and prohibiting the development of such systems in the unincorporated area of Shasta County, and to submit any proposed amendments to the Planning Commission for its consideration and recommended action.

The primary proposed amendments to Section 17.88.035, "Small wind energy systems," of the Shasta County Code consist of the following:

- One wind turbine would be permitted with an approved administrative permit and two or more wind turbines would be permitted with an approved use permit.
- Tower heights in excess of 65 feet on parcels between one and five acres and 80 feet on parcels greater than five acres would be permissible with an approved use permit.
- Small wind energy systems would only be permissible in order to reduce on-site consumption of electricity obtained via the electric grid or to enable on-site generation of electricity in lieu of connecting to the electric grid.

The proposed amendments would allow for the potential of more than one wind turbine on a property and for wind turbine heights in excess of 80 feet; such allowances would require approval of a use permit by the Planning Commission, or by the Board of Supervisors if the Planning Commission's decision is appealed. Because small wind energy systems would be limited to electricity generation capacities that do not exceed on-site electricity consumption, proposed systems exceeding the limits permissible under an administrative permit are anticipated to be the exception rather than the rule.

Proposed amendments to Section 17.88.100, "Public uses, public utilities, and high voltage electrical transmission and distribution projects," of the Shasta County Code consist of precluding large wind energy systems from the provision allowing for public utilities to be permitted with an approved use permit.

Section 17.88.335, "Large wind energy systems," is proposed to be added to the Shasta County Code. This section would define a large wind energy system as a wind energy conversion system that is not defined as a small wind energy system pursuant to subsection 17.88.035.A. of the Shasta County Code and would prohibit large wind energy systems in all zone districts of the unincorporated area of Shasta County.

Environmental Determination: In the April 13, 2022 letter from Anne Mudge of Cox, Castle & Nicholson LLP on behalf of ConnectGen LLC, it is alleged that the proposed amendments to the Zoning Plan are not exempt from CEQA and that the County must prepare an environmental document in compliance with CEQA before approving the proposed amendments.

Ms. Mudge states the proposed amendments would preclude the potential development of approximately 2012 MW of wind energy, preclude the displacement of 2,143,241 metric tons of CO₂ per year, thwart the California Public Utility Commission's (CPUC) Adopted Plan for procurement of approximately 3,500 MW of on-shore wind energy by 2025, thwart the State of California's goals contained in SB 100 requiring renewable energy and zero-carbon resources to supply 100% of electric retail sales to end use customers by 2045, undermine the goal of AB 32 to reduce statewide GHG emissions by 40% by 2030 compared to 1990 levels, and undermine the

Shasta County Air Quality Management District's Regional Climate Action Plan.

While it is true that potential wind energy development in Shasta County would be significantly reduced if the proposed amendments are adopted, the proposed amendments would not result in any violations of state law or Shasta County regulations or policies. No citation is provided in the letter for the CPUC's adopted plan for the procurement of approximately 3,500 MW of on-shore wind energy by 2025 that is referenced; an online search for this plan did not yield any results. Regardless of whether such a plan exists, it would not be possible for a new wind energy development proposal to obtain the required utility interconnection agreement, land use entitlements, and grading and building permits and be constructed and operational by 2025. The state's renewable energy and GHG emissions reduction goals contained in SB 100 and AB 32 do not require that all types of renewable energy development be permitted in all 58 counties in California. Further, the proposed amendments do not conflict with the energy objectives and policies of the Shasta County General Plan, which do not specifically address wind energy. General Plan Objective E-2 is as follows:

"Increase utilization of renewable energy resources by encouraging development of solar, hydroelectric, biomass, waste-to-energy, and cogeneration sources."

Shasta County contains one industrial wind energy facility, the 101.2 MW Hatchet Ridge Wind Project, as well as numerous additional renewable energy facilities, including hydroelectric, biomass, and cogeneration. Prohibiting the development of additional industrial wind energy facilities will neither preclude the ongoing operation of existing renewable energy facilities nor the development of additional renewable energy facilities, including small wind energy systems, in Shasta County. Due to the significant variations with respect to factors including native vegetation, wildlife, topography, fire hazard severity zones, surface water resources, scenic resources, and tribal cultural resources, not all types of renewable energy facilities are equally suitable in all counties in California. California Government Code section 65850 authorizes California counties to regulate the use of land and the intensity of land uses. Furthermore, Article XI, Section 7, of the California Constitution enables California counties to adopt and enforce ordinances and regulations to protect and promote the public health, safety, and general welfare of its citizens. The state's renewable energy and GHG emissions reduction goals do not infringe upon the ability of individual counties to regulate land uses, including renewable energy facilities, in any manner that it deems necessary to protect and promote the public health, safety, and general welfare.

The Shasta County Air Quality Management District's Regional Climate Action Plan referenced in Ms. Mudge's letter was considered as a draft plan by the Shasta County Air Pollution Control Board in 2012 but was never adopted; therefore, it is not possible for the proposed amendments to undermine this unadopted draft plan.

Ms. Mudge's letter does not contain facts or evidence which adequately support the claim that prohibiting the development of additional large wind energy systems in the unincorporated area of Shasta County has the potential to result in significant adverse impacts on the environment. One point of fact in support of this conclusion is that the ability to develop various types of renewable energy facilities within the remaining 57 California counties would be unaffected by the proposed amendments to the Shasta County Zoning Plan. With respect to the future development of wind energy facilities, it is important to recognize a recent significant shift in California law. On September 23, 2021, Governor Newsom signed into law AB 525 which directs state agencies to develop a strategic plan for off-shore wind resources in California. This legislation requires the California Energy Commission to evaluate and quantify the maximum feasible capacity of off-shore wind on or before June 1, 2022 and to establish off-shore wind planning goals for 2030 and 2045, including mapping out near-term infrastructure improvements needed to accommodate off-shore wind energy facilities, in order to achieve the state's renewable energy goals. The importance of on-shore wind energy facilities in meeting the state's renewable

energy goals will likely be significantly diminished due to the ability to develop off-shore wind energy facilities in the near future.

Appendix G of the State CEQA Guidelines contains the following questions that must be considered when determining whether a discretionary proposal has the potential to result in a significant adverse impact on the environment:

VI.b. Energy: Would the project conflict with or obstruct a state or local plan for renewable energy or energy efficiency?

VIII.b. Greenhouse Gas Emissions: Would the project conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?

Based upon the evidence and analysis presented above, it can be seen with certainty that the proposed amendments would not conflict with or obstruct a state or local plan for renewable energy or energy efficiency or with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases. It can likewise be seen with certainty that the proposed amendments would not result in a direct or reasonably foreseeable indirect physical change in the environment. Therefore, the determination that the proposed ordinance is not subject to CEQA pursuant to State CEQA Guidelines section 15060(c)(2) as specified in the proposed ordinance is valid and defensible.

ALTERNATIVES: The following alternatives are available:

1. Recommend that the Board approve Zone Amendment 22-0001 with revisions.
2. Continue the public hearing to request additional information.
3. Do not adopt the draft resolution, in which case the draft ordinance would not be considered by the Board of Supervisors.

CONCLUSION:

Staff is of the opinion that the proposed ordinance supports the public necessity, health, safety, convenience and general welfare of the citizens of Shasta County.



PAUL A. HELLMAN

Director of Resource Management

PAH/trh/All Districts

Copies: Project File

Attachments: Letter from Anne E. Mudge of Cox, Castle & Nicholson LLP dated April 13, 2022
Additional Public Comments
Planning Commission Resolution No. 2022-003 (Resolution of Intention)
Draft Resolution No. 2022-014
Draft Strikeout Ordinance
Draft Ordinance



North State Climate Action

Dear Commissioners:

My organization, North State Climate Action (NSCA) is a group of volunteers in California's far North State region. Our mission is to **promote solutions addressing the climate crisis through education, collaboration, and action in our communities.** To avoid increasingly dire effects of climate change, including drought, deadly heat waves and worsening fires, we must cease reliance on fossil fuels as quickly as possible with carbon free energy such as wind power. Wind power has the advantages of limiting climate change, improving air quality, and also significantly reducing water demands that fossil fuel power creates. Additionally, wind power technology is still evolving, and future projects may be able to provide environmental mitigations not available today. Please consider the following comments as you evaluate Zone Amendment 22-0001. Ordinance changes proposed in the amendment prohibit all "large" wind power projects in the unincorporated county regardless of specific project details. Don't propose enactment of a blanket prohibition on a viable, clean and renewable power source in Shasta County.

Wild fire potential may be the most contentious issue for siting wind farms. We have arranged our comments to address fire concerns first. Then we discuss each of the impacts that were determined to be significant but unavoidable in the Fountain Wind project, as those issues will be similar in any future wind power proposal. We then discuss the general plan objectives addressed by staff in their report.

Wildfire

The Fountain Wind EIR deemed fire risk less than significant with proposed mitigations. Similar or additional mitigation would be implemented for any new proposed project. Enhanced fire suppression techniques during construction, operation, and decommissioning could be considered for future proposals, such as:

- Greater fuel free buffer zones surrounding roads and towers;
- Enhanced maintenance for wind tower mechanical, electrical and fire suppression equipment;
- Enhanced maintenance of transmission lines including those off site;
- Burying transmission lines;
- Curtailment of turbines during extreme fire conditions;
- Additional removal of flammable debris along off-site roadsides. This was proposed in the Fountain Wind project, but the scope was apparently not considered adequate by the Supervisors;
- Changes in construction materials. In the Hatchet Mountain project, turbine nacelles were constructed of steel, instead of fiber glass, providing enhanced fire protection.

Also note that the access roads and site work in any wind farm project will provide fire breaks, aiding fire suppression, as noted in the Fountain Wind EIR and by Cal Fire.

The wind turbines at Hatchet Mountain have never experienced a fire, and they have been in operation for 12 years. It's estimated by a wind trade organization that a wind tower has only a 1/2000 to 1/15,000 chance of a fire per year. This review estimated chances of fire to be even lower. These estimates include data from many older towers without cutting edge technology such as automatic nacelle fire suppression.

A major concern expressed by the public, commissioners, and supervisors regarding the Fountain Wind project was the difficulty of aerial fire fighting near the turbines, and that's a valid issue. As indicated by Bret Gouvea with CAL FIRE at the October 26 Board of Supervisors meeting, although the difficulty of fire suppression adjacent to a wind tower is an important consideration, these types of decisions are part of the hazards considered in any fire fighting plan. Mr. Gouvea also noted that all firefighting situations are unique. CAL FIRE could have spoken against the Fountain Wind project as proposed, but did not do so. Additionally, the specific layout of wind towers in a project is important in any analysis of aerial firefighting potential. For example, a linear layout of towers similar to the Hatchet Mountain project would likely simplify aerial fire fighting.

With all the mitigation discussed above, the risk of destructive fires is substantially reduced. Not eliminated, which is impossible, but substantially reduced. In accordance with the EIR for Fountain Wind, fire impacts were reduced to less than significant with mitigation (as

noted, mitigation could be enhanced in future projects) and planning staff concurred with that analysis.

Evaluation of wind project benefits should take into account that the potential loss of life from wind power during its construction and operational life is significantly less than from fossil fuel power. [One source](#) indicates that the number of deaths from fossil fuel power generation (due to fuel extraction, transport, refining, construction, distribution and operation) is almost 150 times that of wind power. In accordance with that information, for a project similar to Fountain Wind there is a 50% chance of one death over a 40 year operation period, versus the potential of 69 deaths from fossil fuel power (primarily due to air pollution). Potential deaths from wild fires sparked by wind power would increase the chance of wind farm deaths to a degree, but it's very unlikely to be comparable to fossil fuel power mortality. It's clear that fossil fuel power kills.

Most of the County is in a high or very high potential fire area according to Figure FS-1 of the General Plan (currently outdated according to staff). All construction activities, well as human occupation in those areas, have the potential to ignite fires. That, however, has not led to considering a prohibition of construction of homes and other buildings anywhere in Shasta County. That risk is accepted. If that type of building can continue, why not wind farms with appropriate mitigations? Additionally, since figure FS-1 of the general plan is not current, and the county is working on updating it, these ordinance changes are premature. Also note that Figure FS-1, although outdated, contains limited areas not considered either high or very high fire risk.

Biological Resources.

There is no doubt that wind towers cause bird and bat mortality. Wind projects should be sited properly and be required to minimize bird and other wildlife losses. Impacts to biological resources were thoroughly discussed in the Fountain Wind EIR and any proposed wind farm project would require the same process. Note that climate change presents a much greater potential for individual and species loss than wind farms. [According to the United Nations](#) climate change may contribute to the extinction of 20–30 percent of all species. [According to the Audubon Society](#), “If climate change continues apace, hundreds of North American bird species' ranges will shrink by at least half by 2100.”

Both the [Audubon Society](#) and the [American Bird Conservancy](#) support properly sited wind power. State and Federal departments of Fish and Wildlife made no comments on the final Fountain Wind EIR. Future wind projects could be further constrained to provide additional bird and bat protection, as well as other wildlife. Some promising methods for additional bird fatality reduction include [painting of towers, or even painting one blade of the turbine black](#), and [use of radar](#) to detect approaching flocks so turbines can be temporarily shut down. One

objection raised against Fountain Wind was the adequacy the post-construction bird mortality monitoring. That objection could be overcome by expanding such monitoring beyond the 3 years proposed in that project, perhaps for the life of a project. Studies have also been performed using dogs to better spot birds killed in tower collisions. Compensatory mitigation is another option to preserve bird populations. This mitigation could consist of earmarking land not on the wind farm proper as increased habitat for species of concern, or a project to minimize bird mortality from other causes, such as power transmission that is not a part of the proposed project. Lastly, Fountain Wind proposed that individual turbines could be removed if they were shown to cause unacceptable bird mortality. Such a condition could, and should, be included in any future wind farm proposal.

The issue of wildlife protection in wind projects also must be compared to wildlife impacts from fossil fuel power generation that wind can replace. One study estimated that fossil fuel power resulted in the loss of 10-15 times as many birds as wind power, on a per kilowatt-hour basis. This mortality data included older wind farms, which are more likely to cause bird kill than newer towers.

Aesthetics

Aesthetics tends to be a bit subjective, so we are not going into this issue in detail. It should be noted, however, that wild fires exacerbated by climate change will continue to severely impact the beautiful view sheds of the county.

Cultural and Tribal Resources

Similar to other comments above, it's not possible to discuss this issue in detail until there is a project to analyze. Any project in Shasta County could impinge on Native American concerns and cultural resources, but that is not a given, and any necessary mitigation must be site specific.

Additional mitigations regarding this issue were proposed for Fountain Wind after the Planning Commission hearing, including providing access to areas the tribes considered significant to their cultural and religious practices. That same approach, or others, could be investigated if relevant to a new project.

Air Pollution

The EIR found that impacts from PM10 emissions were significant and unavoidable, but recommended that the Planning commission adopt a statement of overriding considerations to allow the project. Future proposed wind farms would likely have similar issues, but the scope of those issues would depend on the size, location, and other specifics of the project.

Compliance with General Plan Objectives as noted in the staff report.

Following are the General Plan Objectives that were discussed in the staff report and thoughts on how those objectives do not necessarily preclude the construction of wind farms in the county.

Objective FS-1 Protect development from wild land and non-wild land fires by requiring new development projects to incorporate effective site and building design measures commensurate with level of potential risk presented by such a hazard and by discouraging and/or preventing development from locating in high risk fire hazard areas.

The county can fulfill this objective by requiring appropriate mitigations specific to each wind project. It's not possible to adequately analyze a project for fire danger, or even whether it is in a very high fire danger zone, until there is a project to consider and fire hazard zones have been updated by the county. Note the objective does not propose a blanket ban on all projects in high fire danger zones in the county, and the benefits of wind power should be considered in fulfilling this objective. And, as noted above, there is no current consideration of preventing development except for wind farms.

Objective SH-1 Protection of the natural scenery along the official scenic highways of Shasta County from new development which would diminish the aesthetic value of the scenic corridor.

The entire county is not a scenic highway. There are many potential wind project areas adequately distant from the County's designated scenic highways to eliminate wind towers from their view shed. Prohibiting wind farms in the entire County due to aesthetic considerations of scenic highways is overkill. The commission may consider prohibiting wind farms within a prescribed distance of scenic highways, but that determination should again be evaluated taking into account the benefits of wind power. As also noted above, if the risk of wildfires due to relentless temperature increases from climate change continues, the scenic resources along these highways are likely to burn, eliminating a major portion of their **scenic value**.

Objective CO-3 To guide development in a pattern that will respect the natural resource values of County lands and their contributions to the County's economic base.

Harvesting of the wind resources of the county, which will contribute substantially to the county's economy, while helping to reduce green house gases and minimize climate change exacerbated wildfires (which degrade the aesthetic resources of the county with acrid smoke and burned timberland), seems to be a good fit for this objective. The Fountain wind project

has economically benefited the county, as noted by former supervisor Moty at the 26 October 2021 Board of Supervisors meeting, and future wind projects could bring similar benefits.

Objective CO-4 To guide development in a pattern that will minimize land use conflicts between adjacent land users.

We can certainly see that placing wind towers at a location where they would dominate the landscape of adjacent property owners could create a conflict. But these potential conflicts must be weighed along with the potential benefits of a wind farm to everyone in the county.

In conclusion, power generated with wind energy benefits everyone in the county, including indigenous populations, due to its mitigation of climate change's deleterious effects, reduction of air pollution and decreased water use. Even if a proposed wind project has significant impacts, impacts and benefits should be considered on a site specific basis to assess whether its benefits override those impacts.

Please do not recommend a blanket prohibition on wind farms in the county,.

Thank you for the work you do and the opportunity to comment on these proposed ordinance changes.

Ron Dykstra



Shasta Environmental Alliance

P.O. Box 993777 • Redding, CA 96099 • ecoshasta.org

April 13, 2022

Paul Hellman, Director of Resource Management
Shasta County Planning Commissioners
1855 Placer Street
Redding, CA 96001

RE: REGULATION OF WIND ENERGY SYSTEMS

Dear Mr. Hellman and Shasta County Planning Commissioners

This letter is in reference to the proposed ordinance regarding the regulation of wind energy systems and the draft ordinance that you will be considering on your meeting of April 12, 2022.

First, we want to commend the Planning Commission for your thoughtful consideration and eventual denial of the Fountain Wind Project despite considerable support from construction, real estate and business interests in Shasta County and beyond. Due to fire danger in steep and forested terrain, wildlife habitat issues and the concerns of the Pit River Tribe, we too did not support the project.

We do have serious concerns about the draft ordinance you have before you for the following reasons:

LARGE WIND ENERGY PROJECTS

1. It is too broad, eliminating all of Shasta County from any large scale wind projects because of fire hazards ignores the many other sources of wildfires in Shasta County such as automobiles, both on and off highway; outdoor shooting ranges (BLM land near Keswick Dam has had many), gas powered equipment such as lawnmowers (Jones Fire 1999), and perhaps foremost are PG&E powerlines: arson is another common source of wildfires in Shasta County, including the recent Fawn Fire. The number of wildfires caused by wind farms is extremely small and much less than the threat of fire from the above stated reasons.
2. If wind farms are placed in terrain that is not steep nor heavily forested, aerial firefighting planes could still make fire drops. It would also be much easier to make a fire break.

3. These wind farm projects could be an important source of energy, jobs and taxable income for Shasta County and California.

SMALL SCALE WIND PROJECTS

This section is so limiting that it seems to have been written with the sole purpose of even preventing small scale wind energy from being developed in Shasta County, as if someone has a philosophical opposition to wind energy.

The primary problem with this section of the ordinance is that the height limit is 80 feet. This is way to small to catch higher winds that would make a wind turbine profitable. The Walmart Distribution Center south of Red Bluff near Gerber has a wind turbine that is 265 feet tall and provides 15 to 17% of the center's electricity needs. It has been in operation over 10 years and has not caused any fires to my knowledge. I have driven by this turbine many times and it does not detract from the aesthetics of the area.

Monterey County has allowed wind turbines in the Salinas Valley and a number of them have gone up in the area around Gonzales and Greenfield near Highway 101. The towers are up to 300 feet tall and are placed at the end of row crops in the area. While I enjoy the seeing the Coast Range as I drive up that highway, the wind turbines do not detract from the aesthetics. Plus, they give farming interests extra income from leasing out their land as they do to farmers across the United States. By passing this ordinance you could be denying farmers in the Fall River area the opportunity to supplement their farming income in the future.

With the new federal and state requirements mandating increased renewable energy sources, you would be limiting Shasta County from achieving many of these goals. While I'm sure the Shasta County Attorney's office has reviewed this ordinance for its legality, it seems like this is something that could motivate certain legislators to pass a statewide law banning extremely constrictive ordinances such as this one.

We urge you to reconsider this ordinance, it does not seem to have been thoroughly thought out and needs to be changed as noted above.

Sincerely,



David Ledger, President

From: [SCPlanning](#)
To: [Paul Hellman](#)
Subject: FW: Zone Amendment 22-0001 Comment
Date: Wednesday, April 13, 2022 8:01:48 AM
Attachments: [image001.png](#)

Tracie Huff

Administrative Secretary I
Planning Division
Shasta County Resource Management
1855 Placer Street STE 103
Redding CA 96001
(530) 225-5532 Phone
(530) 245-6468 Fax
resourcemanagement@co.shasta.ca.us



From: Doug Mandel [REDACTED]
Sent: April 12, 2022 9:08 PM
To: SCPlanning <scplanning@co.shasta.ca.us>
Subject: Zone Amendment 22-0001 Comment

⚠ EXTERNAL SENDER: Do not follow links or open attachments unless you recognize the sender and know the content is safe.

Dear Commissioners:

Power generated with wind energy benefits everyone in the county due to its mitigation of climate change's deleterious effects, reduction of air pollution and decreased water use. Even if a proposed wind project has significant impacts, impacts and benefits should be considered on a site-specific basis to assess whether its benefits override those impacts.

Please do not recommend a blanket prohibition on wind farms in the county.

Sincerely,

Doug Mandel

Redding, CA 96001

From: [SCPlanning](#)
To: [Paul Hellman](#)
Subject: FW: Zone Amendment 22-0001
Date: Thursday, April 14, 2022 7:54:44 AM

Tracie Huff
Administrative Secretary I
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resourcemanagement@co.shasta.ca.us

-----Original Message-----

From: MaryAnn M [REDACTED]
Sent: April 13, 2022 5:13 PM
To: SCPlanning <scplanning@co.shasta.ca.us>
Subject: Zone Amendment 22-0001

EXTERNAL SENDER: Do not follow links or open attachments unless you recognize the sender and know the content is safe.

Shasta County Planning Commissioners: As a citizen of Shasta County since 2005, I am concerned that the proposed Zone Amendment 22-0001 regarding regulation of Wind Energy Systems County-Wide is overly broad and restrictive. There are large areas in Shasta County that are not in a high fire hazard zone. In these areas the most crucial objections to the Fountain Wind Project would have been moot. Also, mitigations for the impacts of wind farms are improving. We do need to reduce our reliance on fossil fuels, that have many negative impacts on the environment and our climate. Please do not commit the error of government over-reach in a County that is predominantly anti-Govenent already. Thank you.

Sincerely,
MaryAnn McCrary
5136 Bidwell Road
Redding, CA. 96001



April 14, 2022

Shasta County Planning Commission
1855 Placer Street, Suite 103
Redding, CA 96001

Via electronic email

Subject: Proposed Prohibition of Large Wind Energy Systems, Zone Amendment 22-0001)

Dear Chair and Members,

Pattern Energy writes with significant concerns and opposition the proposed amendments to Shasta County's Zoning Code (Zone Amendment 22-0001), prohibiting wind energy systems in unincorporated Shasta County, where they are currently conditionally allowed.

As the owner of Hatchet Ridge Wind Project, Pattern Energy works to bring benefits to Shasta County. Hatchet Ridge Wind expects to generate more than \$30 million over the first 20 years of operations in tax payments benefiting the local region and schools.

The Hatchet Ridge Wind Community Benefits Program invests \$5 million in the local community through the Shasta County General Fund, the Burney-Fall River Education Foundation, and the Burney Regional Community Fund administered by the Community Foundation of the North State.

We want to continue to serve as stewards of the land as we work to provide reliable, low-cost power to Northern Californians, and we pledge to work with you on any future modifications to the project, including a possible repowering.

We understand Shasta County's independence and appreciation for the land and resources it provides to your local communities and hope to work with you in partnership toward a more reliable and affordable power grid.

Sincerely,

A handwritten signature in blue ink, appearing to read "Danielle", with a long, sweeping horizontal line extending to the right.

Danielle Osborn Mills
Senior Manager, External Affairs
Pattern Energy



California Wind Energy Association

April 14, 2022

Shasta County Planning Commission
1855 Placer St Suite 103
Redding, CA 96001

Via email

Re: Proposed Prohibition of Large Wind Energy Systems

Dear Chair and Members of the Planning Commission:

The California Wind Energy Association (CalWEA)¹ writes with alarm regarding the proposed amendments to Shasta County's zoning code (Zone Amendment 22-0001) that are before you today. If approved, these amendments would prohibit large wind energy systems in almost all areas of unincorporated Shasta County where they are currently conditionally allowed.

CalWEA urges the Planning Commission to reject the proposed amendments outright. At a minimum, the County must prepare an environmental analysis in compliance with the California Environmental Quality Act (CEQA) before considering such amendments.

Wind energy will play a critical role in meeting California's climate change mitigation goals aimed at the root cause of the drought and wildfires that are wreaking havoc in California. A study performed for the California Energy Commission looking at means of achieving California's energy-decarbonization goal² shows that dramatic growth in wind energy will be required to achieve that goal most affordably while ensuring the reliability of the grid.³ The California Public Utilities Commission's resource plan includes over 3,500 megawatts

¹ CalWEA is a 20-year-old trade association representing wind energy and related companies focused on the California market, primarily including owners, operators and developers of wind energy projects located in California and in waters off the California coast.

² SB 100, signed into law in September 2018, establishes as state policy that zero-carbon resources are to supply 100% of California retail sales by December 31, 2045.

³ California Energy Commission, "Deep Decarbonization in a High Renewables Future," at Figure 14. CEC-500-2018-012. June 2018. (Available at: <https://www.energy.ca.gov/2018publications/CEC-500-2018-012/CEC-500-2018-012.pdf>.) This study shows that, absent a large amount of wind energy from within or outside of the state to balance solar resources, decarbonization will come at an added cost of nearly \$20 billion per year. Also see

(MW) of additional wind energy delivered to the Cal-ISO grid by 2025,⁴ a 60 percent increase in the amount of wind energy generation currently operating in California. Realizing the state's clean energy goals, of which in-state wind energy is a critical component, will require counties to recognize, in their planning and permitting decisions, that wind energy projects must be part of the solution to the most pressing environmental problem of our time.

Shasta County's professional planning staff have previously found that two properly designed large wind energy projects are compatible with high-fire-risk lands and are not detrimental to health, safety, and general welfare of neighboring persons. The Hatchett Ridge wind project has been safely operating for over 10 years. At the same time, wind energy projects bring important economic benefits to local communities, including jobs and tax base.

For these reasons, CalWEA urges the Commission to reject the proposed amendments. At a minimum, as explained in a letter submitted to the Commission on this matter by Cox Castle & Nicholson LLP (dated April 13, 2022), the County must prepare environmental review documents in compliance with CEQA before considering this proposal. The collateral impacts on the environment from the proposed amendments could include failure to achieve California's climate change mitigation plans.

Sincerely,



Nancy Rader
Executive Director

⁴ California Public Utilities Commission Decision 22-02-004 at Table 5 (February 10, 2022).

From: [SCPlanning](#)
To: [Paul Hellman](#)
Subject: FW: Wind Farms
Date: Thursday, April 14, 2022 11:51:52 AM
Attachments: [image001.png](#)

Tracie Huff

Administrative Secretary I
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resourcemanagement@co.shasta.ca.us



From: Warren Swanson [REDACTED]
Sent: April 14, 2022 10:19 AM
To: SCPlanning <scplanning@co.shasta.ca.us>
Subject: Wind Farms

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Planning Commissioners,

I'd like to make a comment on the proposal to ban all windmills from Shasta County. This is a deeply flawed and regressive idea. Shasta County has already received copious amounts of negative press around the country (New York Times, LA Times, SF Chronicle) about our fringe right wing groups. We don't need more articles painting us as a joke hick town (we are not).

Climate change is real and happening faster than predicted.
We need all hands on deck to slow it down and wind power is
one way to do that.

Please do the right thing and reject this ridiculous proposal.

Warren Swanson

3299 Woodbury Dr, Redding, CA 96002



From: [SCPlanning](#)
To: [Paul Hellman](#)
Subject: FW: Wind farms
Date: Tuesday, April 12, 2022 10:01:50 AM

Tracie Huff
Administrative Secretary I
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resourcemanagement@co.shasta.ca.us

-----Original Message-----

From: Jeen Wopat [REDACTED]
Sent: April 12, 2022 9:36 AM
To: SCPlanning <scplanning@co.shasta.ca.us>
Subject: Wind farms

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April 12, 2022

Greetings Shasta County Planning Commissioners,

We request that you NOT support a blanket wind farm prohibition! We prefer that you evaluate each wind farm proposal based on its individual merits.

We appreciate that a blanket prohibition would be perhaps handy from a legislative perspective and administratively save some public dollars, but it would in no way serve our greater need of addressing clean energy challenges as we continue to find our way in an ever-changing climate threat.

Sincerely,
Michael and Linda Wopat
Shasta County residents, homeowners,
and voters

Sent from my iPhone

From: [REDACTED]
To: [SCPlanning](#)
Cc: [Paul Hellman](#); [Lio Salazar](#); [NSCA Steer Comm](#)
Subject: Zone Amendment 22-0001 Regulation of Wind Energy Systems County-Wide, Item R3, 14 April meeting
Date: Tuesday, April 12, 2022 7:08:27 PM

EXTERNAL SENDER: Do not follow links or open attachments unless you recognize the sender and know the content is safe.

Shasta County Planning Commissioners,

I believe that Shasta County should continue to consider future wind energy projects. I understand the concerns that have caused the County to dismiss recent wind power projects; however, each project should be evaluated separately. Appropriate mitigation measures should be required to reduce negative impacts. Wind power is a relatively clean energy that can help to reduce our dependence on fossil fuels.

It seems short-sighted to dismiss all large-scale wind energy projects in Shasta County. Please do not adopt Zone Amendment 22-0001.

Thank you for considering my concerns.

Carole Crowe
Redding, CA

Comments for Planning Commission regarding the prohibition of large wind energy systems within the unincorporated area of Shasta County

I think it's a fantastic idea to prohibit large wind energy systems in Shasta County because these countryside monsters do catch fire on a regular basis. This is a real ongoing threat for all of Shasta County. At some point, it is likely that one of the Hatchet Ridge wind turbines will catch fire, so I hope fire crews will be able to minimize the damage.

People across the world send me videos of turbine fires several times a year. This link shows a recent one.

<https://www.facebook.com/richard.major1/videos/10110297277215878>

But besides the wildfire dangers from wind turbines and infrastructure, there are other very good reasons to forever ban these systems in Shasta County. This industry and our government agencies lie about nearly everything with these energy systems and it's at the expense of the public. Below is new factual information I have put together for Shasta County that I want to be part of the official record.

The Interior Department's New Bald Eagle Take Numbers

America's green energy fraud has been going on for decades and as I have discovered, it never sleeps.

The Interior Department, with fraudulent research and has announced new imaginary bald eagle population estimates of about 317,000 bald eagles, New limits on the number of bald eagles that can be killed by industry each year have been increased to [15,832](#). The previous take limit, also created with fraudulent research, was set in 2016, at [4200 bald eagles](#) annually.

From [Federal Register](#)"Although some of the increase in the estimates of population size from 2009 to 2019 can be attributed to improvements in methods, the majority of the increase is likely due to population growth, estimated to be around 10 percent per year."

Improvements in "methods" really means, continue to ignore real world conditions dismiss the bald eagle habitat abandonment near wind farms like Hatchet Ridge and crank up the rigging for investors.

Not sure if the Interior Departments new eagle population estimates include Alaska or not but the population of [Alaska's bald eagles](#) is about 30,000. Alaska by leaps and bounds, has more bald eagles than any other state. Subtract that number from 316,708 and we are supposed to believe that on average, each of the lower 48 states has a population average of 5,971 bald eagles. In California the bald eagle population doesn't even come close and we might have 1/3 this number, but no more.

Here in Shasta County, CA, we easily have the highest density of bald eagles in the state and the total population including juveniles is about 150. Except for occasional migrants, many of California's 58 counties don't even have bald eagles. My Estimate is that there could be 1500 bald eagles living in CA.

As for Having 5791 bald eagles living in Ca, at some point it could be possible but the turbines killing them off in at Altamont and in the Delta region, would have to be destroyed. As for each of the lower 48 states having an average population of 5,971 bald eagles, it's not possible and in fact, the state of Alaska is the only state with this number of bald eagles.

The Interior Department has lied about the bald eagle population for 48 out of the 49 states with bald eagles. Keep in mind, they also produced a [fake study](#) that overestimated a golden eagle population in central CA by over 10 times.

Green Energy's Hidden Eagle Slaughter

Recently an American wind energy company pleaded guilty to federal criminal charges after at least 150 eagles were killed since 2012. The company has agreed to spend as much as \$27 million on efforts to prevent more deaths.

The company has agreed to spend up to 27 million to prevent more deaths. What good is this? Except for shutting down turbines, there is no way to prevent eagle deaths from wind energy. This industry and the USFWS are very aware of this because wind turbines have been annihilating eagles for decades.

The truth is, these 150 dead eagles are only the tip of the iceberg and very likely represent less than 1% of this ongoing carnage. Back in 1997, when California was the only state with wind turbines in eagle habitat, the Denver Eagle Repository, reported wind turbines being one of their primary sources for their yearly 800 eagle carcasses. When compared to 1997, America now has 80 times more installed wind energy than it did back then 1997. Today, based upon Repository records released up to 2014, the Denver Repository now receives over 3000 eagle carcasses a year.

But with this green energy expansion came a new era of wind turbines. These new turbines invading eagle habitats, were also far more deadly. Early turbines had blade tip speeds that were 110-120 mph while tip speeds for new turbines have speeds twice as fast.

Why doesn't the public know about any of this?

1) Wind energy mortality disclosures are not required, scientific research is not required and all wind industry mortality research being conducted, is being staged.

2) In 1997, the Clinton Administration created new laws so this ongoing slaughter could be conveniently considered, a business trade secret.

3) In 1997, The Freedom of information Act was changed to protect this industry.

4) In 1997, Interior Department personnel were silenced and their employment required non-disclosure agreements with very strict penalties.

5) In 1997, the Denver Eagle Repository was silenced and no longer allowed to discuss the origin of their eagle carcasses.

6) Leaseholders in partnership with wind energy developers are also required to sign very strict non-disclosure agreements. These leaseholders are never allowed to discuss species mortality taking place from the wind turbines on their property. They're also required to immediately dispose of carcasses. Even with post construction mortality research, access by leaseholders and wind energy employees has never been restricted during studies.

6.2.5 Disposal of Animal Carcasses. Owner agrees to take all reasonable measures to avoid attracting scavenging birds and other animals by ensuring all animal carcasses on the Property are immediately (to the extent permitted by applicable law) burned, buried, adequately and completely composted by covering with an adequate amount of earth or mulch, cooked or placed in enclosed containers with lids if such carcasses will be removed at a later time from the Property. Animal carcasses shall not be left in open fields or adjacent to buildings and shall not be left uncovered or exposed.

Since 1997, nobody involved with wind energy and its eagle carcasses, has been allowed to disclose the truth.

Dead Eagle numbers

The Interior Department and USFWS claim that they keep no records for the origin of these eagle carcasses.

An Email I received from USFWS agent Jill Birchell in 2016, confirmed this government protocol of secrecy.

"Hi Jim,

I checked with our repository and learned that they don't keep detailed records of where the eagles they receive come from."

Up to the year 2014, the Repository did report eagle carcasses being received and processed. For 2014 they reported receiving 2309 eagle carcasses for dispersal to American Indians and noted others that had not been counted, which would likely bring totals to about 2400. Since 2014 the numbers of eagle carcasses being processed for the Native Americans is no longer being given out.

NATIONAL EAGLE REPOSITORY ANNUAL REPORT: 10/01/13 – 09/30/14						
REGION	WHOLE EAGLES AND EAGLE PARTS RECEIVED			WHOLE EAGLE ORDERS FILLED	EAGLE FEATHER & PARTS ORDERS FILLED	COMBINED FILLED ORDERS BY REGION
			REGION TOTAL	BALD/GOLDEN	BALD/GOLDEN	
1			239	135	376	511
2			65	479	1,113	1,592
3	Iowa Region		591	129	357	486
4			352	24	114	138
5			229	24	110	134
6			492	170	519	689
7			216	3	13	16
8			125	62	240	302
TOTAL			2,309	1,026	2,842	3,868
NEW REQUESTS RECEIVED						
	BALD EAGLES	1,176				
	GOLDEN EAGLES	1,795				
	EITHER SPECIES	1,379				
	TOTAL	4,350				
NOTES: The incoming bird count is not complete as we are still evaluating birds received in September. The final total number of birds and bird parts received will probably be about 2,400. The total number of eagles and parts shipped, as well as the number of new requests received are complete as of 10/22/14. 2842 parts orders due to more eagles hit by turbines now being found more mutilated						

**LAST REPOSITORY
Report Published**

But this eagle carcass story doesn't end with just Repository Eagles being processed for American Indians. There are many other carcasses because "clean" eagles are required for ceremonies; eagles that have died as a result of electrocution, vehicle collision, unlawful shooting or trapping, poisoning or from natural causes are unacceptable for ceremonial sacrifice.

In 2014 NBC did a story on the Denver Repository 2014. In this story about recycling eagles to American Indians, the repository reported that they had processed about 42,000 eagle carcasses. This Interior Department facility was opened in 1995.

<https://www.nbcwashington.com/news/local/protecting-eagles-in-life-and-death/1985909/>

In the interview discussing Wildlife Repository Specialist Dennis Wiist, this was revealed ... "But at last count, almost 42,000, he's touched nearly every eagle that's come through this facility."

Add another 8 years of receiving 2500-3000 eagles and about anyone past the eighth grade can come up with an estimate of over 60,000 eagle carcasses since 1995. It's hard to imagine and even harder to stomach, but over 60,000 eagle carcasses have secretly shipped to this repository, with no cause of death or origin given. When Shasta County approved the Hatchet Ridge wind project, this county became a part of this green fraud on America.

If federal prosecutors really wanted prosecute green energy's eagle kills

Even though the USFWS won't report the carcasses it would still be fairly easy to prove what's taking place with America's hidden eagle carnage through indirect means. Sort of like using cell phone tracking data to convict a murderer.

The prosecution of 150 eagles killed since 2012 is nothing to get excited about when nothing has been done about tens of thousands of other eagles killed by wind energy. America's silenced USFWS agents know exactly what's taking place because they process and arrange FedEx overnight shipping for nearly all the eagle carcasses shipped to the Denver Eagle Repository.

If federal prosecutors wanted the truth, a look into FedEx records would give investigators a very good idea what's taken place. From FedEx they would know the origin of shipments, they would see the proof of millions paid out by the US government for overnight shipping and the weight of crates would indicate the number of eagles per shipment. Surveillance on the Repository site in Denver would also clue investigators in on the number of Fed Ex shipments coming in per week.

Another way for prosecutors to get to the truth about green energy's eagle carnage, they could start interviewing leaseholders. I know of one case (have documents) where a dead bald eagle was found near a turbine and it was reported by someone that hadn't signed a lease. When agents arrived at the property, the eagle was nowhere to be seen because the leaseholder had already disposed of it.

At some point, if a Shasta County prosecutor wanted to do something similar with Hatchet Ridge, I could help them with a few other ideas.

Wind energy calculations that show 4-5 times less turbine energy actually being produced for the grid

Recently I looked into Wind energy's contribution to an isolated energy grid in Nome, Alaska then compared it to Iowa's glowing Wind energy production numbers.

As I discovered, green energy calculations have very little to do with reality. But by using "Green" energy math methodology and with the help from our politicians, Iowa is able to make claims about producing almost [60%](#) of Iowa's electrical energy from wind.

It's not true, and an analysis of the grid in Nome, Alaska explains why.

11,660 megawatts

Iowa's wind generation capacity of 11,660 megawatts in 2020 provided just shy of 60% of the state's electricity last year. IEC highlighted the need to reach 11 gigawatts of wind capacity by 2032 to stay on track for a 2050 goal of 100% renewable energy in our publication Iowa's Road to 100%. April 31, 2021

<https://www.iainvironment.org/newsroom/energy-news>

Iowa Nears 60% Wind Energy Generation Milestone - Iowa ...

 About featured snippets •  Feedback

This report from Alaska is extremely interesting because Nome Alaska has a completely isolated electrical grid. In order to survive, the people of Nome have to depend on diesel generators and an intermittent supply of wind energy. By the way, the winds around Nome are considered prime for wind power generation.

ACEP Technical Report

Nome Wind-Diesel System Overview

Chris Pike and Nathan Green

DRAFT Report – November 1, 2017

A report for the Alaska Energy Authority as part of the Renewable Energy Fund Data Collection and Analysis Effort

Nome, Alaska

Nome has two Wärtsilä 5.4 MW diesel generators, which alternate to supply power. A 3.6 MW Caterpillar generator is used during the off-peak summer hours when demand is low; a 1.8 MW Caterpillar generator is used to augment peak loads during winter afternoons. A 0.4 MW diesel generator is used as a black start unit in case of a black out and can support lower temporary peaking requirements.

Presently, NJUS operates one of the most efficient diesel powerhouses in Alaska, with an average kWh/gal of 15.8 for the period of July 2015 through June 2016, according to power cost equalization (PCE) records.

Initially the Nome wind project consisted of eighteen 50 kW Entegriity turbines. After the full value of the tax credits was realized by Banner Wind LLC, the company sold the Banner Wind project to NJUS along with the long-term lease for the land, effective January 2015. In 2013, two additional 900 kW wind turbines were installed by the utility, using millions in funds from the Alaska Renewable Energy Fund program and a contribution from the local fishing community development quota program, Norton Sound Economic Development Corporation.

Today all of Nome's smaller Entegriity turbines have been shut down due to grid inefficiency and high costs. The project lasted about 10 years but the two larger .9 MW turbines still remain.

Nome Joint Utility System (NJUS) Assistant Manager Ken Morton:

"The cost to maintain the smaller units has increased to the point that the cost of the diesel fuel they displace no longer pencils out."

"NJUS does not at this time have plans to replace the turbines or add additional ones. However, if grant funding becomes available for additional turbines, as well as funds for a battery system that would allow for greater reliance on wind energy, NJUS would pursue that."

In 2021 the Nome Joint Utility System allocated funds to have all their [original 18 turbines](#) to be taken down.

Iowa Wind

So, what does all this have to do with Iowa?

Nome used real world numbers to determine the value and contribution from wind energy for their customers. A 2017 report (see image) said the [actual contribution](#) ("penetration") to Nome's grid in 2015, averaged out to a pitiful 6.3% (see image).

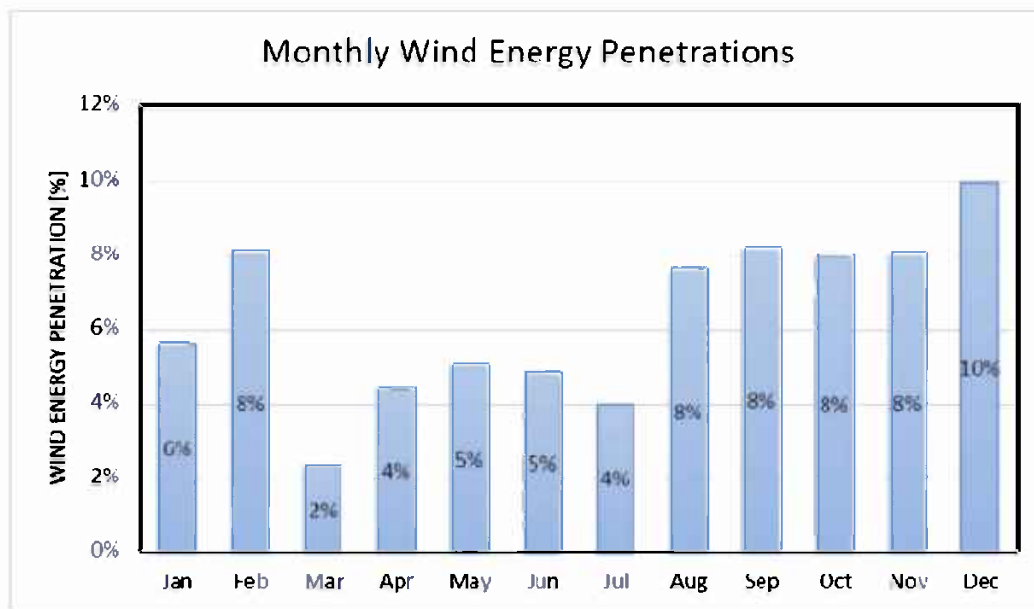


Figure 13. Wind energy penetration by month. To arrive at these figures, the total wind energy fed to the grid each month is divided by the total energy generation each month from all generation sources.

6.3 % yearly average

These are grid numbers and calculations never disclosed from America's other 49 states. The primary reason, Nome's utility district is trying to survive as efficiently as possible while developers and utilities in the other states are busy soaking taxpayers.

Nome Alaska 2015 electric profile

Wind 2.7 MW percentage of nameplate capacity 33%

Diesel 5.4 MW percentage of nameplate capacity 66%

Total 8.1 Wind energy's annual contribution to Nome grid 6.3%

With their baseload diesel generators compared to installed the wind energy nameplate capacity, Nome had an installed diesel to wind 2 to 1.

Iowa's 2020 electric profile

Wind 11,322.5 MW percentage of nameplate capacity 50%

Coal and other sources 11,147.9 MW percentage of nameplate capacity 50%

Total nameplate capacity 22470.4 MW

[Iowa](#) has an installed capacity ratio of about 1 to 1 when their baseload energy sources are compared to installed nameplate wind capacity. Iowa does have a greater

percentage of installed wind capacity than Nome. But if we double Nome's wind energy capacity to equal Iowa's 50% wind mix, the annual contribution Nome's utility would still only achieve about a 12.6% contribution to their grid from wind.

When compared to Nome, Iowa has far more energy transmission losses for wind energy because consumers in Nome are located only 4.5 miles from their wind farm. But assuming all things being equal, including annual wind speeds, Using the same the wind mix/grid penetration calculations from Nome, means that all of Iowa's thousands of turbines, still only contribute about 12-13% of the Iowa's usable energy to the grid.

In a previous post, I said Iowa, grid requirements need constant [base loads](#) of 3000 – 4500 MW. These were old very conservative numbers taken from an Iowa energy site. Today's Iowa's average base load requirements from coal and sources besides wind, are very likely 6500-7000 MW or about 60,000,000 MWh per year.

These energy numbers for Iowa's grid are real and are nowhere to be seen with wind energy reporting. It sure appears that Iowa is using fraudulent wind energy estimates to collect an abundance of Production Tax Credits along with selling regular energy created in fossil fuel plants, as being green.

Iowa's true wind energy value to customers is likely being deliberately overstated between four and five times. The same holds true for every bit of the [EIA](#) wind energy data posted for CA and all other states as well.

In conclusion, this is truly a horrendous industry and the approval of Hatchet Ridge was a monumental mistake by Shasta County Supervisors. For the good of this county, let's hope that Hatchet Ridge is the last wind project to ever be approved in Shasta County.

Jim Wiegand - Lakehead CA

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Additional supporting images shown below:

Iowa Electric Profile (2020 - Including Non-Utility Generation)

ELECTRIC GENERATION IN IOWA BY PRIMARY ENERGY SOURCE	2020 NAMEPLATE CAPACITY (MW)¹	PERCENT OF NAMEPLATE CAPACITY	2020 GENERATION (MWH)²	PERCENT OF GENERATION
Coal	5,754.7	25.61%	14,146,835	23.72%
Wind	11,406.9	50.76%	34,182,302	57.32%
Nuclear	0.0	0.0%	2,904,863	4.87%
Natural Gas	4,215.0	18.76%	7,036,824	11.80%
Hydro	129.2	0.58%	1,025,215	1.72%
Other & Other Renewables	22.0	0.10%	207,440	0.35%
Petroleum	924.2	4.11%	111,111	0.19%
Solar	18.4	0.08%	22,082	0.04%
Total	22,470.4	100.00%³	59,636,672	100.00%³

1	Table 4. Electric power industry capacity by primary energy source, 1990 through 2020						
2	Iowa						
3	megawatts						
4		Year 2020	Year 2019	Year 2018	Year 2017	Year 2016	Year 2015
39	Total electric industry	21,333.2	20,409.5	18,842.2	17,670.8	17,045.5	16,8
40	Battery	1.4	1.1	1.1	.	.	.
41	Coal	5,284.0	5,343.8	5,371.7	5,497.9	5,548.8	6,2
42	Hydroelectric	150.4	146.4	146.4	146.4	144.9	1.
43	Natural gas	3,694.7	3,647.1	3,580.7	3,571.1	2,931.8	2,6
44	..Natural gas - CC	1,816.2	1,829.0	1,779.8	1,772.6	1,121.1	1,1.
45	..Natural gas - GT	1,228.4	1,226.8	1,260.4	1,265.7	1,140.3	1,1
46	..Natural gas - IC	106.5	96.4	97.2	91.4	92.4	.
47	..Natural gas - ST	543.6	494.9	443.3	441.4	578.0	3
48	Nuclear	.	601.4	601.4	601.4	601.4	6
49	Other
50	Other biomass	20.6	20.6	21.4	21.4	21.4	.
51	Petroleum	841.6	851.7	854.0	852.7	1,022.9	1,0
52	..Petroleum - GT	204.1	205.3	201.5	202.1	385.9	4
53	..Petroleum - IC	605.5	614.4	613.0	618.6	605.0	6
54	..Petroleum - ST	32.0	32.0	39.5	32.0	32.0	.
55	Solar	18.0	13.4	8.9	7.7	2.6	.
56	..Solar- PV	18.0	13.4	8.9	7.7	2.6	.
57	Wind	11,322.5	9,784.0	8,256.6	6,972.2	6,771.7	6,1
58	Other biomass includes agricultural byproducts, landfill gas, biogenic municipal solid waste, other biomass (solid, liquid and gas) and sludge w						
59	Other gases includes blast furnace gas, and other manufactured and waste gases derived from fossil fuels.						
	Other includes non-biogenic municipal solid waste, batteries, chemicals, hydrogen, pitch, purchased steam, sulfur, tire-derived fuels, waste						
	Source: U.S. Energy Information Administration, Form EIA-860, Annual Electric Generator Report.						
	►	1. Summary	2A. Plants-Capacity	2B. Plants-Generation	3 Retailers	4. Capacity	5

Fake numbers

1	Table 5. Electric power industry generation by primary energy source, 1990 through 2020					
2	Iowa					
3	megawatthours					
45	Total electric industry	59,636,671	61,673,544	63,380,569	57,909,566	54,39
46	Battery	-60	-94	0		
47	Coal	14,146,835	22,159,203	28,552,999	25,358,230	25,19
48	Hydroelectric	1,025,215	796,268	924,861	1,033,940	97
49	Natural gas	7,036,824	7,684,253	7,340,070	4,567,447	2,96
50	..Natural gas - CC	5,971,857	6,892,269	6,409,135	3,746,433	2,47
51	..Natural gas - GT	479,512	386,174	518,450	343,837	19
52	..Natural gas - IC	2,769	10,192	3,200	12,169	
53	..Natural gas - ST	582,687	395,617	409,286	465,008	34
54	Nuclear	2,904,863	5,235,716	4,895,399	5,213,509	4,76
55	Other	0	0	0	2,382	9
56	Other biomass	199,395	203,122	209,177	207,859	29
57	Petroleum	111,111	238,192	110,565	146,719	27
58	..Petroleum - GT	671	101,527	3,049	25,607	4
59	..Petroleum - IC	7,744	9,853	7,610	24,555	12
60	..Petroleum - OTH	24	67	300	0	
61	..Petroleum - ST	102,672	126,745	99,606	96,558	9
62	Solar	22,082	15,436	11,456	4,838	
63	..Solar- PV	22,082	15,436	11,456	4,838	
64	Wind	34,182,302	25,328,971	21,334,057	21,372,752	20,07
65	Wood	8,105	12,478	1,986	1,890	
Other biomass includes agricultural byproducts, landfill gas, biogenic municipal solid waste, other biomass (solid, liquid and gas) and						
Other gases includes blast furnace gas, and other manufactured and waste gases derived from fossil fuels.						
Other includes non-biogenic municipal solid waste, batteries, chemicals, hydrogen, pitch, purchased steam, sulfur, tire-derived fuels						
Note: Totals may not equal sum of components because of independent rounding.						
66	Source: U.S. Energy Information Administration, Form EIA-923, Power Plant Operations Report and predecessor forms.					



From: [Jennifer Levens](#)
To: [SCPlanning](#)
Subject: Wind energy ban
Date: Saturday, May 7, 2022 3:51:58 PM

EXTERNAL SENDER: Do not follow links or open attachments unless you recognize the sender and know the content is safe.

To Whom It May Concern:

Be advised that given the number of trees you are allowing to be destroyed for new housing, you are essentially smothering this area. Now you want to ban a clean source of energy to further the demise of all living things. For shame. For Shame.

Jennifer Levens

From: [John Livingston](#)
To: [SCPlanning](#)
Cc: [Ron Dykstra](#)
Subject: We should not ban large commercial wind farms
Date: Monday, May 9, 2022 8:53:42 AM

EXTERNAL SENDER: Do not follow links or open attachments unless you recognize the sender and know the content is safe.

I have lived in Shasta County for over 55 years and am aghast at the actions of Shasta County Planning Commission and Supervisors. It is completely inappropriate for Shasta County to ban large scale wind farms completely. There is so much positive energy from wind farms and their ability to replace fossil fuels that we need to consider each project on a case by case basis. We would not ban pig farms outright even though they smell terrible and pollute the surface and groundwater. /we would do an analysis of each project and have community meetings and write an EIR and then decide. The Planning Commission should either throw out the proposed ordinance or modify it significantly to allow projects to be considered, analyzed and proper environmental analysis made before making a final decision.

Respectfully John Livingston Resident

On the hope of a new year

by Amanda Gorman National Youth Poet.

May this be the day
We come together.
Mourning, we come to mend,
Withered, we come to weather,
Torn, we come to tend,
Battered, we come to better.

Tethered by this year of yearning,
We are learning
That though we weren't ready for this,
We have been readied by it.
We steadily vow that no matter
How we are weighed down,
We must always pave a way forward.

Excerpt from poem "New Day's Lyric."

From: [Lisa MacDonald](#)
To: [SCPlanning](#)
Subject: Resolution No. 2022-014
Date: Wednesday, May 11, 2022 5:13:42 PM

EXTERNAL SENDER: Do not follow links or open attachments unless you recognize the sender and know the content is safe.

Dear Planning Commission,

Please support the amendment to the zoning changes regarding large & small wind turbine developments. As a resident of Round Mountain and a member of the opposition to the Fountain Wind Project I ask you to vote YES on the resolution. I support the resolution not just because of my opposition to the project in my area but for all citizens of Shasta County that could be tremendously harmed by any such project.

Thank you.

Regards,

Lisa MacDonald
SUNSET REAL ESTATE
2610 BECHELLI LN.
STE# H
REDDING CA 96002

530-941-9082 call/text
530-221-9000 office
SunsetRealEstate.com

CA DRE LIC #01400197

From: [MaryAnn M](#)
To: [SCPlanning](#)
Subject: Zoning Amendment 22-0001, Agenda Item R5
Date: Wednesday, May 11, 2022 11:22:52 AM

EXTERNAL SENDER: Do not follow links or open attachments unless you recognize the sender and know the content is safe.

To: Shasta County Planning Commission
1855 Placer St Suite 103,
Redding, CA 96001

Comments on the proposed zoning ordinance Amendment 22-0001, Agenda Item R5, for the May 12, 2022 meeting of the Shasta County Planning Commission

In the staff report prepared for agenda item R5 the rationale supporting the proposed regulation of wind energy rests on fire safety issues and fire hazard maps of Shasta County unincorporated areas. The amendment then should apply to the high and very high fire hazard zones, not to the entire unincorporated area of Shasta County.

The scope switch from high and very high fire hazard zones to all of the unincorporated area of Shasta County was explained only by the relatively small portion of the unincorporated area that is considered to be a "moderate fire hazard area".

However, at the scale of the fire hazard maps, the small area of moderate fire hazard is in the neighborhood of 30,000 acres. Should this arbitrary choice to include the entire unincorporated area, dictate what can and cannot be done on those 30,000 acres?

It seems un-American to do so.

The amendment would serve appointed staff interests for expedience, perhaps. It would serve PG&E's interests to maintain their monopoly on energy, certainly.

As written, Amendment 22-0001 does not serve to allow a free market to solve energy and economic problems in Shasta County. The proposed ordinance amendment is an example of well-intentioned government workers substituting their paternalistic thinking for the principles that made our country great. This is government over-reach. And that is exactly how the future of Shasta County gets limited.

Sincerely,

MaryAnn McCrary

Redding resident & voter

MAY 9 2022

To: Shasta County Planning Commissioners
Mr. Paul Hellman, Director of Resource Management

ADMINISTRATION

From: Citizens in Opposition to the Fountain Wind Project (CIO FWP)

Subj: Zone Amendment 22-0001, Regulation of Wind Energy Systems County-Wide (Zoning Text Amendment) - Agenda Item R5, on Planning Commission Agenda for May 12th, 2022

We fully support Resolution No. 2022-014, a resolution of the Shasta County Planning Commission recommending that the Shasta County Board of Supervisors approve Zone Amendment 22-0001, regulating small and large wind energy systems. We fully support the prohibition of large wind energy systems within the unincorporated areas of Shasta County for the purpose of protecting and promoting the public health, safety, and general welfare of the residents of Shasta County.

This Commission discussed the need for zoning changes in January of 2022 and then directed Mr. Hellman's staff to put together the Resolution to present to the Supervisors for consideration. Resolution No. 2022-014 captures the items discussed and requested by the Commission. Mr. Hellman, provided all the necessary background, including CEQA law review, which supports the decision to implement the zoning changes listed within the proposed Zone Amendment 22-0001, enabling the protection of the communities across Shasta County most affected by these types of industrial developments. In addition to Mr. Hellman's Resolution 2022-014, Commissioner Kerns provided overwhelming support, via his Shasta County wildfire map, where wildfires have engulfed large areas across Shasta County. Commissioner Chapin, with decades of forestry expertise, also stated he does not believe that these types of industrial developments should be built within the forested areas. He stated these are the highest wildfire prone areas which could destroy trees and take decades or a hundred years or more to fully recover. Various experts provided overwhelming testimony, during the recent public hearings, that industrial wind turbine developments in forested areas only introduce unnecessary wildfire risk where wildfires could not be fought effectively within/surrounding the turbine fields. These expert testimonies were provided by at least 6 wildfire pilots whose careers have thousands of hours of wildfire fighting experience. One of those experts attended the Supervisor's public hearing for the Fountain Wind Appeal, while on a break from fighting the Dixie Fire, where he had also dropped retardant on the Fawn Fire.

The CIO FWP submitted 2,386 signatures to reject the Fountain Wind Industrial Development. As a point of reference the 2,386 signatures include some of the Shasta County residents from 22 unincorporated communities and three incorporated communities. We also continue to stand with over 4,000 Pit River Tribe members who presented their Resolution opposing such industrial developments. You witnessed numerous members who testified at both public hearings, stating how offensive these developments were. The spiritual native cultural impacts can only be understood by the tribal members and never captured through the CEQA or political process. The approval of Resolution No. 2022-014 support Zone Amendment 22-0001 will remove the fear and threats of future destruction, desecration, and erasing of native cultural ceremonies and scared sites for the Pit River Tribe and other surrounding Tribes.

This Commission denied the Fountain Wind Project in order to protect and promote the public health, safety, and general welfare of the community members. It has already been proven, even stated by the Fire Safety Representative from Shasta County, and addressed to Supervisor Moty, that the

preparation work and clearing for these industrial projects bring their own risk so it is as not as “clear cut” for fire safety through the environmental review process. As stated on numerous occasions, by various experts, these types of industrial developments, within the highest wildfire rated and forested areas are not acceptable.

We truly appreciate and commend your proactive efforts with these zoning amendments, just as has been done in other counties, which provide protections to the native cultural resources, environment, safety, protection, and general welfare of the community members. We believe time is of the essence since community members within the Big Bend area have stated developers continue to test the wind resources. We believe it will only be a matter of time before the County receives the next special use permit for an industrial wind development in our forested areas.

We humbly request you approve Resolution No. 2022-014, which supports the zone changes for Zone Amendment 22-001, prohibiting additional large scale industrial wind developments within Shasta County. The approval of Resolution No. 2022-014 will support the communities targeted, even for their marginal wind resources, and stop the emotional and financial trauma brought to the community members who are threatened by these industrial developments. As Commission Kerns correctly stated we were under threat for our communities, religious and cultural freedoms, livelihood, and way of life for over 2 ½ years by the Fountain Wind Project please don’t allow that to happen to again other community members within Shasta County.

Sincerely,

Beth Messick-Lattin
Chair, Citizens in Opposition
to the Fountain Wind Project

May 9th, 2022

Subj: Resolution 2022-014 for Zone Amendments 22-0001, Agenda Item R5, for 12 May 2022

Dear Planning Commissioners,

We appreciate the effort Mr. Hellman, the Planning Department Staff and the Commission (especially Commissioner Kerns) have put into the Zone Amendment 22-0001 and ask that you “yes” on Resolution No. 2022-014. We concur with the research and statements provided in the staff report for the May 12th R5 agenda item. The Zone Amendment 22-0001 rightly seeks to ban industrial scale wind energy development in the unincorporated lands of Shasta County, it further accurately defines small scale wind energy systems in County Code and clearly defines how variations to allowed small wind energy systems would be considered by the County Planning Department.

This resolution was prompted by the information that came to light as a result of recent efforts involving the Fountain Wind project. Most importantly, the growing threat of wildfires in our area and the impediment to fighting them caused by industrial scale wind energy systems. Further evidence of the growing nature of the wildfire threat was also provided by staff and Commissioner Kerns in their presentation on the number of wildfires in Shasta County in the recent past. The most recent CalFire wildfire assessment Map was also presented in which over 95% of the County was rated “High” or “Very High” Wildfire Severity Zones. These facts along with the many other unavoidable environmental impacts of these types of developments to Native American culture and sacred sites, wildlife (including birds, bats, raptors, etc.), aesthetics, and many other impacted areas, are the reason the Fountain Wind project was denied and are the same reasons why this resolution should be adopted.

Some opponents to this Resolution have advocated that Shasta County residents should sacrifice the things they hold dear about Shasta County and put our lives at risk for the sake of meeting California’s Clean Energy goals. What these advocates don’t mention or seem to care about is that Shasta County already provides many times the clean energy it consumes through various other means including hydro, solar, biomass and wind. As County staff has correctly pointed out, California is currently advocating offshore wind energy development, not further onshore development, because offshore wind is much more consistent and abundant without the many issue related to onshore developments. If producing a given amount of clean energy is truly the goal, and it isn’t primarily about the money and making billion dollar corporations even richer, then those advocating for further wind energy development in highly fire prone Shasta County should instead be advocating and lobbying for the re-powering of existing antiquated wind energy systems in Highest Wind Resource areas such as Tehachapi, Altamont Pass, and other similar areas. There are thousands of wind turbines in those areas, and many of them are dilapidated or small and antiquated. We regularly drive through those areas and have seen 50 – 60 small turbines replaced by 5 – 6 large turbines and have read reports of similar revitalizations that produce several times the power of the old systems. The only reason it isn’t happening more often is because of the money, it’s not as profitable. Instead, companies like ConnectGen and others target areas like Shasta County because that’s where the profit is – NOT because it’s any cleaner or the wind resources are any better here, in fact Shasta County has marginal winds at best. They target areas like Shasta County because they can lease the lands cheaply, zoning regulations are generally poor or don’t address industrial wind energy systems and the Counties and the people are relatively poor and can be easily bought with community enhancement funds and tax revenue. Wind Energy advocates should work with State and National legislatures to incentivize repowering efforts and making it profitable for both owners and developers, instead of breaking virgin ground and exploiting other rural areas like Shasta County.

Ms. Mudge, the attorney who claimed the resolution needed to go through CEQA, stated that the ban would preclude 2,012 MW of potential wind energy, suggesting that it was a large part of the 3,500 MW additional clean energy California wanted to produce by 2025. Ms. Mudge states in a footnote (2) of her letter that she derived that very large number from considering ALL PRIVATE unincorporated lands within Shasta County that appear to have commercially viable wind speeds per the latest California Wind Energy maps. Her statement, along with the fact that wind energy data is still being collected within the County, is just further evidence that Industrial Wind Energy developers are still targeting Shasta County and that **action needs to be taken now** to save our County from becoming another Tehachapi or Altamont Pass. The unincorporated private lands she mentions that are of most interest to Wind Energy Developers is likely the various large tract owners like Shasta Cascade Timberlands and other timber companies. The 2,012 MW of wind energy she sites in Shasta County would be nearly 10-20 additional Hatchet Ridge or Fountain Wind size of developments. Such a plan would drastically change Shasta County and cause irreparable harm to the safety, peace, morals and general welfare of County residents forever. This is all the more reason why this resolution needs to be adopted now.

We believe this Commission can take this courageous positive step to responsibly provide the protections needed to support the health, safety, convenience and general welfare of the citizens of Shasta County for generations to come by approving Resolution No. 2022-014 and supporting the Zone Amendment 22-0001. We believe this commission has the expertise and experience needed to rightly approve this resolution. You have listened to extensive testimony regarding the impact industrial wind energy systems would have on our County, you know they pose an unacceptable risk to County residents, you know they are not the right kind of project for Shasta County. You know that the financial benefits do not outweigh the negative impacts and the risk to the lives of County residents. A "Yes" vote doesn't ban clean energy, it **just** bans industrial size wind energy systems that pose a risk to our way of life and our lives themselves. Shasta County has provided well above their fair share of clean energy and can continue to do so through other clean technologies without the risk to life and property and our general welfare.

There will never be another Commission within Shasta County who has more experience than you do right now concerning industrial wind projects. You know this is the right thing to do. Please vote yes on Resolution No. 2022-014 and continue to work to advocate these Zone Amendment recommendations to the Supervisors for their approval. The time for positive change is now!

Best Regards,

Joseph and Maggie Osa

From: [Dana Silberstein](#)
To: [SCPlanning](#)
Subject: Wind Farms
Date: Tuesday, May 10, 2022 8:50:23 AM

EXTERNAL SENDER: Do not follow links or open attachments unless you recognize the sender and know the content is safe.

I am writing in opposition to a ban on wind farms. With water and power being in such peril we can no longer afford to reject genuine solutions.

We must remain open to alternative energy sources while at the same time controlling their location and aesthetic.

As much as we would like to we cannot continue relying on resources that are dwindling.

Thank you,

Dana Silberstein

From: [asollid](#)
To: [SCPlanning](#)
Subject: vote yes on Resolution No. 2022-014
Date: Thursday, May 12, 2022 6:14:43 AM

EXTERNAL SENDER: Do not follow links or open attachments unless you recognize the sender and know the content is safe.

From: [Kelly Tanner](#)
To: [Paul Hellman](#)
Subject: Comments May 12 Planning Hearing Kelly Tanner
Date: Thursday, May 12, 2022 6:49:18 AM

EXTERNAL SENDER: Do not follow links or open attachments unless you recognize the sender and know the content is safe.

Director Hellman and Commissioners-

I want to write in support of the ordinance to ban industrial turbines in Shasta County and applaud your efforts to create planning that protects communities from the risk of wildfire. As you know, I have a Masters's Degree in Disaster and Emergency Management and wrote extensively on the Fountain Fire. While some disagree about my expertise on fire, others, such as Hellman, have called me an expert on this topic.

This ordinance is not unprecedented. Los Angeles and San Bernardino Counties have passed similar ordinances. It's inappropriate that a lawyer who cannot even properly write a letter was able to use it at the last hour to stall this process simply to draw more opposition from outside groups and special interests.

This ordinance ensures the safety of this County. Why waste county money, time, and resources (or any applicants) when the end result is the same. This county is at very high risk for fire, and regardless of the project, you will put lives at risk and leave them with limited or no fire protection. This should not be acceptable in any community in Shasta County. Nor should the long drawn-out process of leaving citizens in fear of this for years.

I applaud your courage and example in leading as commissioners. Please do not let outside interest groups and foreign or out-of-state companies dictate your decision. The letter was a stall tactic. They have millions of dollars and can mobilize people easily to oppose this. Our local communities are completely unaware. Your ordinance, as written, still allows for turbines that are smaller scale and better for this County. Please pass the ordinance that you want and do not back down to these groups. Economically more industrial size projects like these will be counterproductive and unsafe, and the County will subsidize them with tax money and get none of the economic benefits developers promise these projects. Nor, will they receive the clean energy promised.

I do not have time to attach the document but please ask for it - I do have a document in my possession that the same environmental group in this County suggests this is not the type of project for this County but they have to do something rather than nothing. Remember the spotted owl.

Respectfully,
Kelly Tanner

May 11, 2022 comments for Shasta County Planning Commissioners,

The county is well aware of how I feel about wind energy. This is an industry that has time and again, deceived the citizens of Shasta County with fraudulent research, embellished energy projections and is still hiding behind nondisclosure agreements that conceal their ongoing slaughter to Shasta county's wildlife.

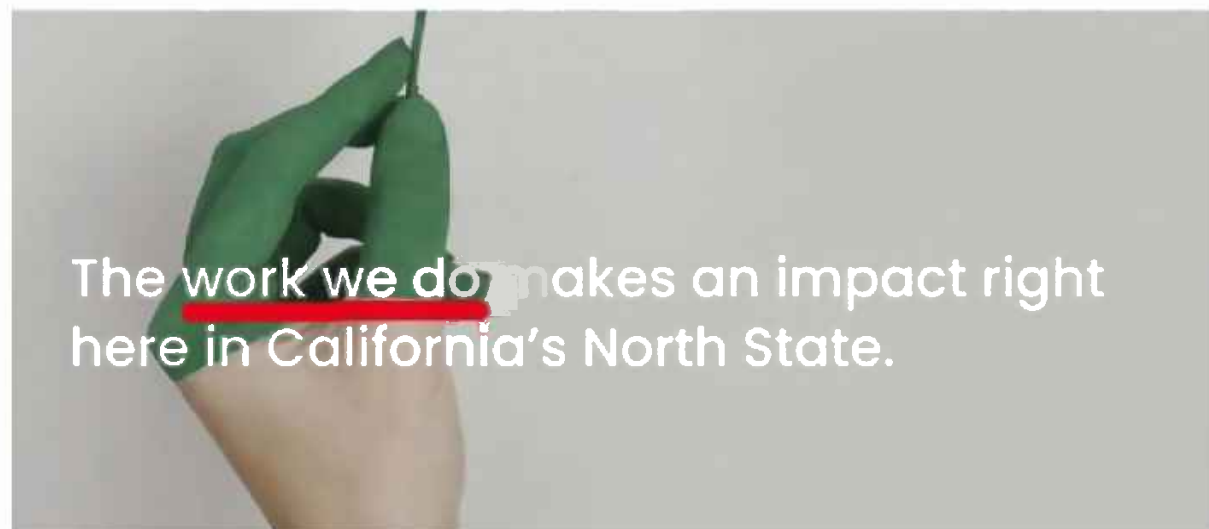
There is no reason to trust this industry, **no reason not to ban this industry in Shasta County** and in the future, no reason not to prosecute this industry. I would even help with investigations. As of May 2022, this industry has never provided a credible reason for any Shasta County commissioners to ever believe a thing they have to say.

Even so, I have resubmitted some of my thoughts with scientific facts once again in an attachment with these comments. My comments below are primarily to provide so insight into a group lurking in our midst called **North State Climate action**.

I am aware of their support of wind energy and a letter they have submitted to Shasta County.



[Home](#) [Our Work](#) |



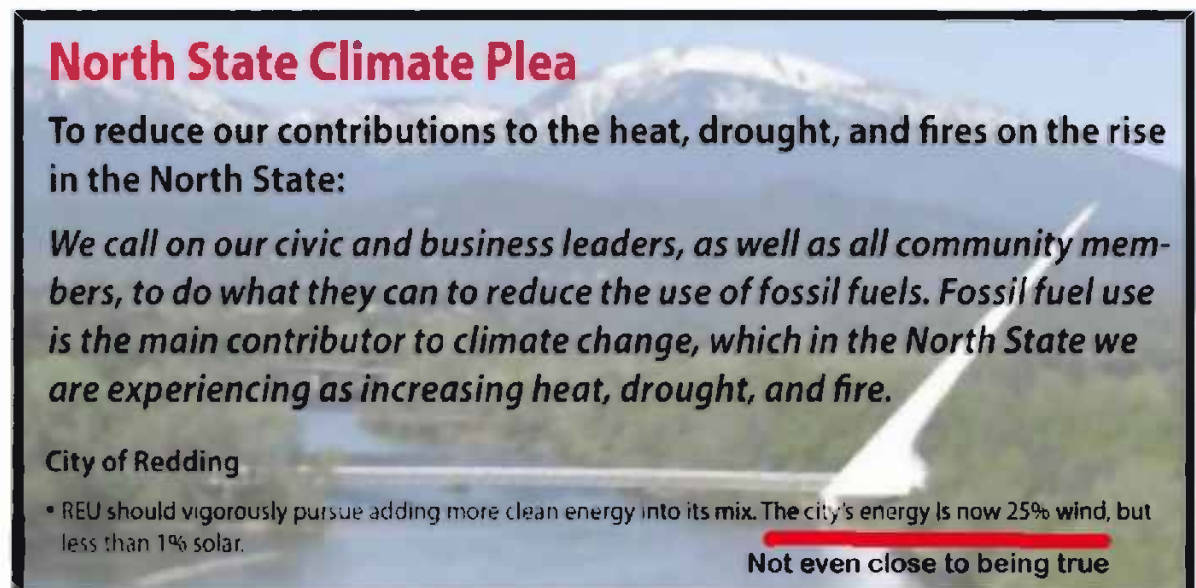
What is the work this group really does?

This group appears to be just one more lockstep Wind industry mouthpiece. They make proclamations about helping climate without providing a shred of scientific evidence for their support of wind energy. They do not reveal if they have any **conflicts of interest**, **no credentials are given** and **nothing is said about their donors**. They're also promoting wind energy's wildly fraudulent claims about their energy contribution to the grid.

And by the way I happen to have plenty of wildlife expertise, decades of field research and no conflicts of interest.

As far as I'm concerned, the work of this group is to use fatally flawed research, loaded with conflicts of interest to spread falsehoods that benefit both the group financially and wind energy interests. Lobbying their interests to Shasta County does not make their mission truthful and remember, they have provided no research of their own.

Audubon (see images below) and ABC birds both sold out to wind energy years ago and have been operating the same way for years. They receive wind energy related funding, have hundreds of millions in assets, yet will not conduct a bit of independent research regarding the hidden and horrific impacts from wind energy developments. With their silence they are also lying by omission. I could write pages about these groups and the discussions I've had with their leaders.



North State Climate Plea

To reduce our contributions to the heat, drought, and fires on the rise in the North State:

We call on our civic and business leaders, as well as all community members, to do what they can to reduce the use of fossil fuels. Fossil fuel use is the main contributor to climate change, which in the North State we are experiencing as increasing heat, drought, and fire.

City of Redding

- REU should vigorously pursue adding more clean energy into its mix. The city's energy is now 25% wind, but less than 1% solar.

Not even close to being true

Gavin Newsom, California's Governor, isn't ready to tell California residents the truth, but here's what's coming, lots more nuclear power.

California's future.....

Postponing Diablo Canyon's closure could make sense — but the devil is in the details

BY HILLARY FRIEDMAN, JOURNALIST

APRIL 22, 2022, 10:00 AM



Cox. Gavin Newsom has shifted his position on Diablo Canyon, California's last nuclear power plant, and now plans to apply for federal funds to keep it open. [JOHNSTON@GREENBULLETNEWS.COM](mailto:johnston@greenbulletnews.com)

The reason, after 40 years of trying, the massive fraud and green lies about wind energy powering the future are coming to an end and without using Green's energy's fraudulent math and omissions, CA's fleet of turbines might be producing a pitiful net of only 2% for the grid.

Currently California is using nuclear power generated from Arizona, but our Faux green state doesn't like to broadcast this reality.

In the near future, California's growing energy needs will have to include more nuclear power and lots of it for electric cars. The Green math hucksters won't disclose this, but with each new electric car purchased, wind power's contribution to the grid just keeps on plummeting.

Turbine Fires will happen

I don't see them all, but here is a new one sent to me from Garner, Iowa, April 22 2022.



National Audubon settlement letter showing the day Audubon sold out to the Wind Industry. From this day forward, I encourage Shasta County Commissioners or Supervisors to look for find a single

negative, meaningful or truthful statement about wind energy coming from this group.

National Audubon Society



1901 Pennsylvania Avenue
Suite 1100
Washington, DC 20006-5
(202) 861-2212
(202) 861-4290 fax

November 2, 1999

Mr. Robert Gates, President
Enron Wind Development Corporation
13000 Jameson Road
Tehachapi, California 93561

Dear Mr. Gates:

It is my understanding that Enron Wind Development Corporation, Tejon Ranch Company, and several other parties have reached an agreement concerning a proposed wind energy development project near Gorman, California. As you know, the National Audubon Society has opposed development of this site because of the potential impact it could have on California Condors.

According to the information we have been provided, Enron Wind Development has taken steps to permanently insure that the Gorman site will not be developed for wind energy, and has agreed with Tejon Ranch to develop another site in the area which does not pose a threat to condors.

I want to take this opportunity to congratulate you and your company for your leadership in working to resolve this very difficult issue. Your firm has a well-deserved reputation as an environmental leader in providing power through wind energy and your decision to seek an alternative to the Gorman site is to be applauded. Your agreement has set a new standard for prompt and responsible action to provide clean, renewable energy in a manner that does not pose a risk to the California Condor.

Given the agreements Enron Wind Development, Tejon Ranch and the other parties have reached, I'm writing to inform you about the steps the National Audubon Society will now take in this matter:

1. We will terminate our campaign to oppose the wind energy development project at the Gorman site.
2. We will inform members of the House of Representatives and Senate that legislation to deny the wind power production tax credit to the Gorman site through the addition of the Audubon amendment to the production tax credit is unnecessary and we do not recommend its passage. We will also inform them that Audubon supports reauthorization of the production tax credit legislation. This information will be communicated in a letter from me to each member; a draft

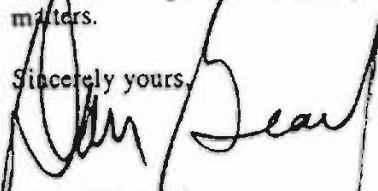
Mr. Robert Gates
November 2, 1999
Page 2

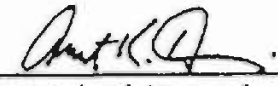
copy of the letter is attached. I will also send letters to the members on the attached list by the close of business November 3, 1999.

3. We will join you and the other parties in issuing the attached press release to inform the media and the public that the issues surrounding the proposed Gorman project have been resolved satisfactorily.
4. We will place the attached ads in congressional newspapers supporting the production tax credit legislation, assuming the funds to pay for these ads can be provided from other sources.
5. We will support your wind energy development project to be located at Section 21, Township 10 North, Range 15 West, San Bernardino Base and Meridian which the U.S. Fish and Wildlife Service has determined does not adversely affect recovery of the California Condor.

Once again, I want to thank you and your staff for their leadership in resolving this matter. I especially want to express my appreciation to Mr. Al Davies of your staff who worked very hard to make this agreement a reality. We look forward to working with you on this and other matters.

Sincerely yours,


Daniel P. Beard
Senior Vice President -- Public Policy


Accepted and Approved

11/8/99
Date

Shasta county should permanetly ban these projects. They are highly destructive, need fraud or nondisclosures agreements to survive, are a danger to rural residents, an incredible drain of tax dollars and provide very little benefit to society.

I would be happy to discuss any of this with North State Climate Action, in front of commissioners, but only if I am allowed to ask questions.

Jim Wiegand - Wildlife Biologist, Lakehead CA 530 2225338

From: [Lon Alward](#)
To: [SCPlanning](#)
Subject: #2022-014
Date: Thursday, May 12, 2022 9:59:14 AM
Attachments: [image003.png](#)
[image004.png](#)
[image005.png](#)
[image006.png](#)
[image007.png](#)
[image008.png](#)
[image009.png](#)
[image010.png](#)

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Please vote yes on resolution #2022-014



<!--[if !vml]--><!--[endif]--> **Lon Alward** | Loan Officer

NMLS 284494 | CA-DOC284494 | ID MLO-20907

Direct 530.605.4870 **Cell** 530.515.1086

Office 530.244.6830 **Fax** 530.222.3270

2280 N. Bechelli Lane, Redding, CA 96002

lon@uslendingcompany.com

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your path home

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From: [Anita Brady](#)
To: [SCPlanning](#)
Subject: Ordinance to eliminate wind farms in the county
Date: Monday, May 9, 2022 8:41:14 PM

EXTERNAL SENDER: Do not follow links or open attachments unless you recognize the sender and know the content is safe.

You are worried about wind farms but OK a development that puts lives and property at risk ?

You have shown your true colors-- developers can buy your influence, wind farms? (not so much)

Shame on you all. Please submit your resignations immediately.

Regards

Anita Brady

Born and bred in Shasta County

From: [Catherine Camp](#)
To: [SCPlanning](#)
Subject: Proposed ban on wind farms
Date: Tuesday, May 10, 2022 11:15:42 AM

EXTERNAL SENDER: Do not follow links or open attachments unless you recognize the sender and know the content is safe.

I strongly urge you to reject the proposed ban on wind farms throughout the unincorporated areas of the county. I can't imagine why this is a good idea. Any proposed wind farm will come before the county and can be considered on the specific merits. Wind energy in general is clean, cheap and renewable. The proposed preemptive ban has the feel of a political statement rather than a considered assessment of how the county confronts energy needs, climate challenges and economic challenges for families. Please vote no.

**DOUGLAS W. CRAIG, PSYD
CLINICAL PSYCHOLOGIST
1650 OREGON ST., SUITE 110
REDDING, CA 96001
LICENSE No. PSY 9469**

May 11, 2022

Shasta County Planning Commission
1855 Placer St Suite 103
Redding, CA 96001

Re: Proposed Amendments to Shasta County Zoning Code to Prohibit Large Wind Energy Systems (Amendment 22-0001)

Dear Chair and Members of the Planning Commission:

Last month, UN Secretary-General António Guterres issued his most dire warning ever on the catastrophic transformations we are facing as we continue to rely on fossil fuels for our energy and transportation needs.

He said, "We are on a fast track to climate disaster. Major cities under water. Unprecedented heatwaves. Terrifying storms. Widespread water shortages. The extinction of a million species of plants and animals. This is not fiction or exaggeration. It is what science tells us will result from our current energy policies."

He continued, "We are on a pathway to global warming of more than double the 1.5°C limit agreed in Paris. Some Government and business leaders are saying one thing, but doing another. Simply put, they are lying. And the results will be catastrophic. This is a climate emergency.

"Climate scientists warn that we are already perilously close to tipping points that could lead to cascading and irreversible climate impacts. But, high-emitting Governments and corporations are not just turning a blind eye, they are adding fuel to the flames.

"They are choking our planet, based on their vested interests and historic investments in fossil fuels, when cheaper, renewable solutions provide green jobs, energy security and greater price stability.

"The science is clear: to keep the 1.5°C limit agreed in Paris within reach, we need to cut global emissions by 45 per cent this decade."

Guterres outlined the solution. He said, "First and foremost, we must triple the speed of the shift to renewable energy. That means moving investments and subsidies from fossil fuels to renewables — now. In most cases, renewables are already far cheaper. It means Governments ending the funding of coal, not just abroad, but at home.

"A shift to renewables will mend our broken global energy mix and offer hope to millions of people suffering climate impacts today. Climate promises and plans must be turned into reality and action, now. It is time to stop burning our planet and start investing in the abundant renewable energy all around us."

Here in Shasta County, we are facing the triple threat of excessive heat, devastating drought and disastrous wildfires. As we continue to emit heat-trapping greenhouse gases into the atmosphere, we are stealing our children's future. We don't have to do this. It is not too late. We need to dramatically transition away from dirty fuels and toward renewable energy like wind and solar as quickly as possible.

Banning Large Wind Energy Systems in Shasta County is madness and incredibly irresponsible. Are we going to stand on the sidelines while other communities step up to do all they can to preserve a livable planet for future generations? Will history show that Shasta County shirked its duty, ignored the science and betrayed its moral obligation to care for others?

I beg of you to not amend Shasta County's code to prohibit large wind energy systems. This would be insane. Instead, send a message to our community that we will join with the rest of the world in bringing about the clean energy revolution that the world's biosphere desperately requires now.

Sincere regards,

Douglas W. Craig

Subject: Zone Amendment 22-0001, Regulation of Wind Energy Systems County-Wide (Zoning Text Amendment) - Agenda Item R5, on Planning Commission Agenda for May 12th, 2022

Greetings Shasta County Planning Commissioners

I write you regarding resolution No. 2022-014, a resolution of the Shasta County Planning Commission recommending that the Shasta County Board of Supervisors approve Zone Amendment 22-0001, regulating small and large wind energy systems. I support the prohibition of large wind energy systems within the unincorporated areas of Shasta County for the purpose of protecting and promoting the public health, safety, and general welfare of all the residents of Shasta County.

This resolution came about as a result of our “community active efforts” involving the stopping of the Fountain Wind Project. Most importantly for myself, the protections of tribal prayer grounds, village sites, sacred places, tribal burials and other vital tribal cultural sources. The Pit River Tribal Nation, with over 4,000 Tribal members, passed and presented their Resolution opposing such industrial wind developments- the Fountain Wind Project. Tribal Band Representatives and Tribal members who testified with insurmountable evidence at both public hearings, stating how offensive these developments were with no regard for the unavoidable negative impacts to tribal cultural sacred places, burial grounds, the ecology, the biology, the wildlife (including raptors, bats, birds etc.), the aesthetics, and etc. Also, the continued and growing threat of wildfires that would be an impediment to fighting them when caused by industrial scale wind energy systems. Equally important, is the information provided by the staff and Commissioner Kerns in their presentation on the number of wildfires in Shasta County in the most recent past. The CalFire wildfire assessment Map was also presented in which over 95% of the County was rated “High” or “Very High” Wildfire Severity Zones. The above statements alone provide enough for you the vote YES!

This Commission discussed the need for zoning changes in January of 2022 and then directed Mr. Hellman’s staff to put together the Resolution to present to the Supervisors for consideration. Resolution No. 2022-014 captures the items discussed and requested by the Commission. Mr. Hellman, provided all the necessary background, including CEQA law review, which supports the decision to implement the zoning changes listed within the proposed Zone Amendment 22-0001, enabling the protection of the communities across Shasta County most affected by these types of industrial developments. Various experts provided overwhelming testimony, during the recent public hearings, that industrial wind turbine developments in forested areas only introduce unnecessary wildfire risk where wildfires could not be fought effectively within/surrounding the turbine fields. These expert testimonies were provided by at least 6 wildfire pilots whose careers have thousands of hours of wildfire fighting experience. One of those experts attended the Supervisor’s public hearing for the Fountain Wind Appeal, while on a break from fighting the Dixie Fire, where he had also dropped retardant on the Fawn Fire- it was powerful testimony!

This Commission denied the Fountain Wind Project in order to protect and promote the public health, safety, and general welfare of the community members. It has already been proven, even stated by the Fire Safety Representative from Shasta County, and addressed to Supervisor Moty, that the preparation work and clearing for these industrial projects bring their own risk so it is as not as “clear cut” for fire safety through the environmental review process. As stated on numerous occasions, by various experts, these types of industrial developments. Therefore, please continue taking the hard look and protect and promote the public health, safety, and general welfare of OUR WHOLE COMMUNITY!

I acknowledge your proactive efforts with these zoning amendments, just as has been done in other counties, which provide protections to the tribal cultural resources, environment, safety, protection, and general welfare of the community members. In the Big Bend area it is a fact that developers continue to test for wind resources, therefore, it is imperative that you pass this Resolution Zone Amendment now. It will only be a matter of time before the County receives the next special use permit for a mega-industrial wind development project in our forested areas. The Zone Amendment 22-0001 rightly seeks to ban industrial scale wind energy development in the unincorporated lands of Shasta County, it further accurately defines small scale wind energy systems in County Code and clearly defines how variations to allowed small wind energy systems would be considered by the County Planning Department. You know that the financial benefits do not outweigh the negative impacts and the risk to the lives of County residents. A “Yes” vote doesn’t ban clean energy, it just bans industrial size wind energy systems that pose a risk to our way of life and our lives themselves. Shasta County has provided well above their fair share of clean energy and can continue to do so through other clean technologies without the risk to life and property and our general welfare.

Approve Resolution No. 2022-014, which supports the zone changes for Zone Amendment 22-001, prohibiting additional large scale industrial wind developments within Shasta County. The approval of Resolution No. 2022-014 will support the communities targeted, even for their marginal wind resources, and stop the emotional and financial trauma brought to the community members who are threatened by these industrial developments. The approval will also remove the fear and threats of future desecration and the erasure of tribal cultural ceremonies and scared sites protections for the Pit River Tribe and other surrounding Tribes.

Sincerely,

Radley Davis, Concerned Resident
Tribal Citizen of the Pit River Nation belonging to the Illmawi Band

From: [cdjmd7160](#)
To: [SCPlanning](#)
Subject: R5 Zone Amendment 22-0001
Date: Wednesday, May 11, 2022 1:56:20 PM

EXTERNAL SENDER: Do not follow links or open attachments unless you recognize the sender and know the content is safe.

I have been a resident of Montgomery Creek since Feb. 1, 1990.

First of all, I wish to thank the Planning Department and particularly the Planning Commission for your 5-0 vote denying the Use Permit for ConnectGen, and the many hours of checking all the pros and cons before coming to that decision. It was a wonderful victory for the "little guy"! And you all are to be commended for this.

I believe these large environmental projects target low income and sparsely populated areas, because they think there will be no opposition from these areas, possibly because of little education. Of course, they care nothing about the land or its residents, out only to make millions in profits. But, they found out with the Stop Fountain Wind group, there are some very intelligent educated residents in this area, that helped to beat this project. It took almost 3 years of diligent work for our Committee of 12 to present the downside of this project. We also thank you for helping protect this area from wildfires. This year wildland fires are predicted to be much worse.

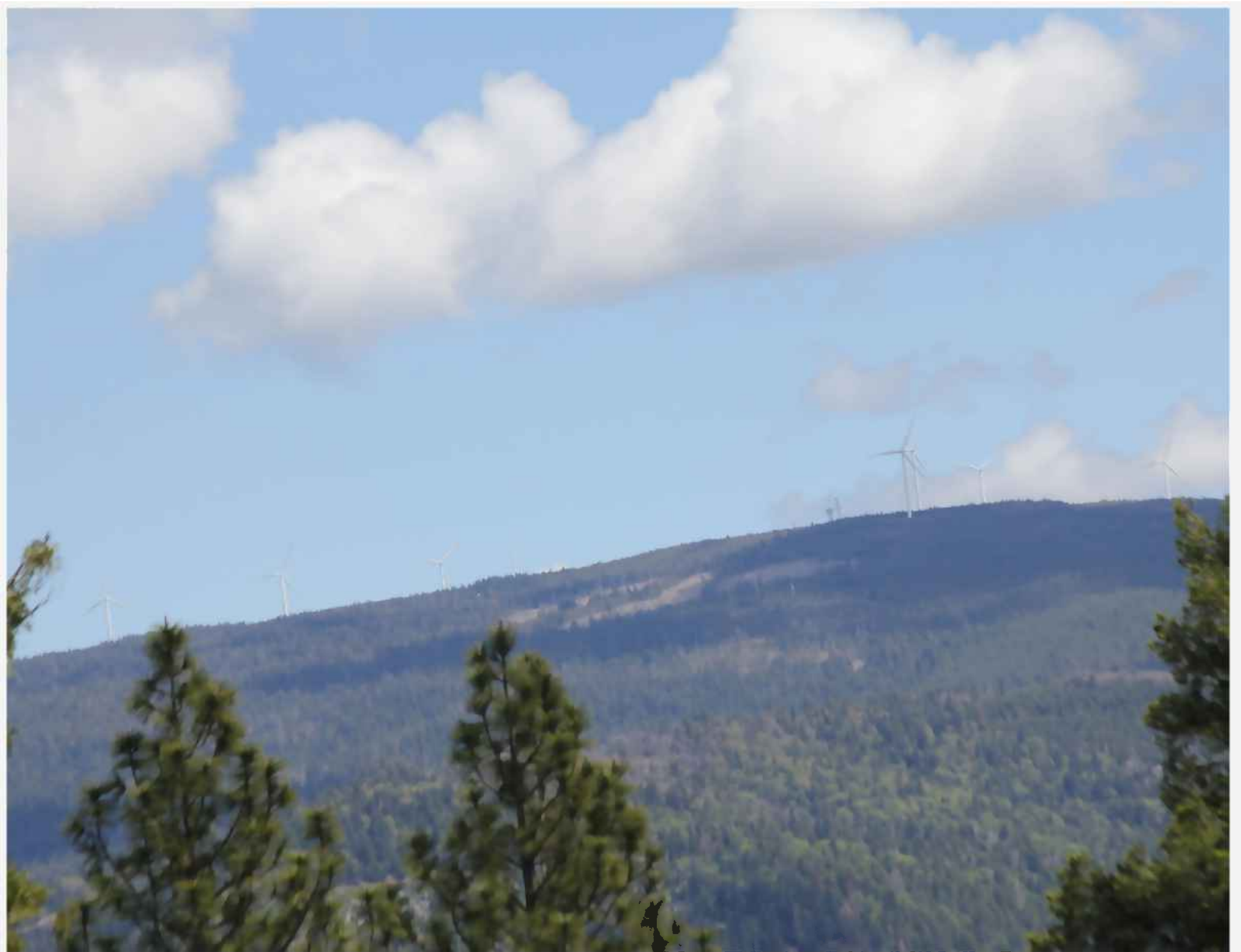
My husband and I were members of the Montgomery Creek Volunteer Fire Company 71 for 12 years; we had only been members of this Company for 6 months before the Fountain Fire came running through. I remember standing on the side of Highway 299E in Montgomery Creek watching the Fountain Fire coming up both sides of the highway, destroying everything in its path, and assisting those evacuating with nothing but their vehicle and the clothes on their back to the Montgomery Creek School parking lot. This fire went all the way over Hatchet Summit into the Burney area, which stunned many people.

I live on the side of a hill, and my view includes Hatchet Ridge Turbines, a photo of which I have attached. I would have seen all of the Fountain Wind Turbines from my home and they would also have been reflected off of a mirrored wall into my Living Room, making its value decrease and perhaps not sellable. In my 32 years here, I have had many people come here, for various reasons, and they always remark what a wonderful and great view I have. I call this my "little piece of Heaven"!

I would ask that you approve your Zoning Amendment to protect this area of wildland fire devastation; we thank you especially for the work you have done in these last few months to bring this Amendment forward, even though the Environmentalists are doing their best to get your Commission to not approve it.

I want to thank the commission for pursuing this amendment, regardless of opposition.

Sincerely, Joan DiMaio



From: [Diane Dobbins](#)
To: [SCPlanning](#)
Subject: Re: Wind farm future for Shasta County
Date: Tuesday, May 10, 2022 10:16:00 AM

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Thank you - yes, I hit send too quickly.

I want to add my voice in support of wind farms for this county. We moved here 5 years ago and are constantly beset with strong winds. Whether that's just the way it is in the north state or it's climate change is aside from the fact that we do have winds on a regular basis. That said, I think it is short sighted not to approve wind farms to produce electricity and reduce the burden on shasta county residents. I do not buy into conspiracy theories that they are killing all our eagles or that they cause cancer. The science does not back this up.

So here's my voice in support of wind farms and hope the planning commission is smart and doesn't succumb to people who just don't want change

Sincerely,
Diane Dobbins

Sent from my iPhone

> On May 10, 2022, at 8:11 AM, SCPlanning <scplanning@co.shasta.ca.us> wrote:

>

> Good Morning,

>

> There doesn't appear to be a message or an attachment to this email. If you had one of those, you might want to try this email again.

>

> Tracie Huff

> Administrative Secretary I

> Planning Division

> Shasta County Resource Management

> 1855 Placer Street STE 103

> Redding CA 96001

> (530) 225-5532 Phone

> (530) 245-6468 Fax

> resourcemanagement@co.shasta.ca.us

>

>

> -----Original Message-----

> From: Diane Dobbins <diane.dobbins@gmail.com>

> Sent: May 10, 2022 6:28 AM

> To: SCPlanning <scplanning@co.shasta.ca.us>

> Subject: Wind farm future for Shasta County

>

> EXTERNAL SENDER: Do not follow links or open attachments unless you recognize the sender and know the content is safe.

>

>

> Sent from my iPhone

From: [Ron Dykstra](#)
To: [Paul Hellman](#)
Subject: Re: Zone Amendment 22-0001 (Wind Energy Systems Ordinance)
Date: Thursday, May 12, 2022 11:26:28 AM

EXTERNAL SENDER: Do not follow links or open attachments unless you recognize the sender and know the content is safe.

Thank you for trying to contact me even going the extra mile with an email. I'm beginning to think there is some incompatibility between my phone and the county phone system. Seems I only have trouble getting county calls. Maybe I'll have to go to TMobile to troubleshoot the problem. Anyway, thanks again. Below are the comments I had planned to present today.

"Mr. Chairman and commissioners.

My name is Ron Dykstra and I'm a long time Shasta County resident. I had hoped to deliver these comments in person, but am recovering from Covid, so I've sent them in by email.

I hope you all had a chance to look at my written comments, which I transmitted on Monday. I respect the fact that you are concerned about the health and welfare of Shasta County residents, that is as it should be. But as I stated in my comments, no harm will come to our county if you don't adopt the proposed resolution. Potential adverse impacts from wind farms such as wildfires obviously can't occur until a project is built, if they occur at all. And your ability to reject a project is not affected if you don't adopt this resolution. One of you mentioned in the April meeting that one reason for these proposed ordinance changes was that it is too difficult to pick and choose which sites would be suitable for wind projects. But it's not necessary for the commission to do this picking and choosing ahead of time. Let the project proponents pick what they deem to be a suitable site along with proposed project mitigations, and then let them convince you of the project's merits, or not. You have the power to reject any future wind farm proposals if you deem them unsuitable. And that's the course you should take, reject this proposed amendment and then you can examine any future proposals on their merits. Don't completely eliminate the possibility of future wind projects that could benefit from better siting, improved technology, and additional mitigations.

Please don't adopt this resolution.

Thank you"

On Thursday, May 12, 2022, 09:26:34 AM PDT, Paul Hellman <phellman@co.shasta.ca.us> wrote:

Ron,

After unsuccessfully attempting to return your call at (530) 262-0271 several times, I thought I would send you an e-mail instead. There are no remote participation options available for Planning Commission meetings. I provided your May 9th comment letter to the commissioners. If you would like to provide any additional written comments, please send them to me and I'll provide them to the commissioners if they are received prior to around noon.

Thanks,

Paul Hellman, Director

Shasta County Department of Resource Management

(530) 225-5114

<https://www.co.shasta.ca.us/index/drm>

May 9 2022

Shasta County Planning Commission
1855 Placer St Suite 103,
Redding, CA 96001

Re: Proposed Amendment 22-0001 to Shasta County Zoning Code to Prohibit Large Wind Energy Systems, May 12th meeting, Item R5

Dear Chair and members of the Planning Commission:

On April 11th, I transmitted comments regarding this issue for a group of which I am a member, North State Climate Action (NSCA). My comments today represent solely my views and may not reflect the opinions of NSCA.

My comments primarily address firefighting information you discussed at the April 14th meeting. Other concerns were addressed in opposition comments transmitted for the April meeting. Fire fighting ability for any wind farm proposal should be analyzed on a site-specific basis, not on the assumption that any fire at any proposed county wind farm is un-fightable.

At the April 14th meeting, a commissioner stated incorrectly that wind towers “take out aerial attack.” CalFire’s Bret Gouvea addressed this issue at the Supervisor’s meeting last October (see the [recording of the meeting](#) at 8:19:39 to 8:28:00). Mr. Gouvea noted that the largest capacity aerial fire fighting equipment would not be usable close to wind towers such as at Fountain Wind, but other aerial fighting equipment would be. Mr. Gouvea stated “When you say a no fly zone, that’s a very broad term, I can’t agree to that.” And the configuration of wind towers in any project are critical to analyze fire fighting capabilities. In his comments Mr. Gouvea noted, as per the CalFire Tactical Air Unit, that “Obviously the placement and separation of those wind towers dictate the use of aircraft.” A future wind farm project would not be identical to Fountain Wind, and tower placement must be considered in assessing fire fighting ability, including aerial attack. If the Fountain Wind project had presented insurmountable fire fighting difficulties, it seems that Mr. Gouvea would have so stated. But he did not.

The commission should have been more precise in its framing of the firefighting issue. The commission characterized all of Shasta County as an “extreme” fire hazard zone. This is not how CalFire characterizes county fire danger. CalFire mostly regards the county as high and very high fire danger, not extreme. Also, approximately 12,000 acres in Shasta County are not designated either high or very high fire danger by the [CalFire Fire Hazard Severity Zones in SRA](#) map. This map does not provide fire hazard designations for those areas that are federal firefighting responsibility so this 12,000 acre value could be an underestimate. The [map that was shown at the April](#) meeting designates about 150,000 acres as less than a very high fire danger area, but does not further categorize those areas. As you know, the Fountain Wind project was in a very high fire danger zone in accordance with that map. Future wind projects may not be in that zone or even in a high fire hazard zone. [The County fire hazard map](#), although outdated, designated about 30,000 acres as moderate fire danger areas, and about 50,000 acres were unclassified. Over 300,000 acres were designated as high fire danger (as opposed to very high). I don’t know the property ownership or wind resources in areas designated as less than very high fire hazard, but the county will be prohibiting wind farms in lesser fire concern areas if the ordinance changes are implemented.

The commission displayed a map showing relatively recent fires in Shasta County. I don't understand the purpose of this graphic. We all know that the county has suffered from many severe fires in the recent past. But how is that relevant to vetting future wind farms for fire fighting ability near them? And future proposals would need an identical fire impact analysis as Fountain Wind, through CEQA.

The commission stated the issue of wind farms in Shasta County has been studied for the last 2-1/2 to three years, but is that the case? The commission has been primarily studying the Fountain Wind project, and that is not equivalent to studying wind projects in general in the county. The impacts of the Fountain Wind project are not necessarily relevant to a proposed future project. Site specific configuration, benefits, and impacts of future projects should be considered on a case by case basis.

The commission stated that everything about wind farms had been discussed, and no new information has been presented since the commission denied the Fountain Wind project in June. But a new proposed wind project, by its differing location and configuration, would necessarily include new information.

Lastly, a photograph of spent fiberglass turbine blades in a landfill was presented by the commission. I hate to see these blades not being recycled, but fiberglass is hardly a dangerous or hazardous waste that will result in groundwater or surface water contamination, or any other adverse outcome. Previously, formaldehyde had been used in turbine blade manufacture, but that is being phased out. Wind power is not yet a mature industry and land filling of spent turbine material is not a given. The reuse of spent fiber glass is now being studied and even implemented in certain cases. In addition, turbine blade manufacture using thermosetting resins is being studied. Thermoplastic resin blades would be recyclable, and also lighter and cheaper than fiberglass.

You should not recommend a county wide prohibition on wind farms, and you should analyze any future wind farm proposals considering their unique benefits and impacts. Shasta County can be a leader in supporting appropriate renewable wind projects. Before you make a decision on these ordinance changes, you must ask yourselves what is the harm done to the county if the changes are not adopted. The simple and correct answer is that there is no harm. If a project is proposed in the future, that is the time to examine its health, safety, and other environmental issues.

Please do not recommend that the Board of Supervisors adopt the proposed ordinance changes.

Thank you

Ron Dykstra

From: [Ginny Erickson](#)
To: [SCPlanning](#)
Cc: [Virginia Erickson](#)
Subject: Wind Farm
Date: Saturday, May 7, 2022 1:38:59 PM

EXTERNAL SENDER: Do not follow links or open attachments unless you recognize the sender and know the content is safe.

Please know that many of us approve of and have hopes that the wind farms will become a reality in Shasta County.

Virginia Erickson

From: [Daniel Fehr](#)
To: [SCPlanning](#)
Subject: Wind Farm Resolution
Date: Tuesday, May 10, 2022 10:52:23 AM

EXTERNAL SENDER: Do not follow links or open attachments unless you recognize the sender and know the content is safe.

May 10, 2022

Honorable Shasta County Planning Commissioners:

The purpose of this email is to vociferously oppose the pending resolution banning wind farms in unincorporated Shasta County, slated for consideration on May 12, 2022.

Support of this resolution represents the ultimate myopia, resulting in the limitation of an available renewable energy option. If humanity is to reverse this carbon-based climate crisis, Shasta County will require all available tools in our toolbox.

We implore the Planning Commission to oppose consideration of this asinine NIMBY and politically-motivated resolution.

Daniel & Susan Fehr
1705 Verda Street
Redding, California 96001

From: [Jon Ferauson](#)
To: [SCPlanning](#)
Subject: Resolution No. 2022-014
Date: Thursday, May 12, 2022 9:17:58 AM

EXTERNAL SENDER: Do not follow links or open attachments unless you recognize the sender and know the content is safe.

Please vote yes on Resolution No. 2022-014.

From: [John Gable](#)
To: [SCPlanning](#)
Subject: Industrial Wind Turbine Ban
Date: Wednesday, May 11, 2022 8:52:47 PM

EXTERNAL SENDER: Do not follow links or open attachments unless you recognize the sender and know the content is safe.

I write this letter on behalf of all the residents of Moose Camp. First I would like to thank you for researching, deliberating and ultimately rejecting the Fountain Wind project. Second I commend you for proposing the ban on industrial size wind projects in the unincorporated areas of Shasta County. The obvious fire danger in the county along with the inability to fight wildfires from the air within and around turbine farms makes a ban the right thing to do. Los Angeles county banned industrial wind turbines in 2017 and San Bernardino county banned them in 2019. Wind energy production in California has barely increased in the past five years with very few new projects coming online. The future of industrial size turbine farms in California has moved from onshore to offshore. Shasta county should be proud of its ability to already provide enormous amounts of renewable energy to the county and clearly does not need to risk the lives of its residents by adding any more industrial size wind turbines. **Please vote yes on the large wind turbine ban.**

Sincerely,
John Gable
Moose Camp Board President

From: [Betty Harner](#)
To: [SCPlanning](#)
Subject: Ban of Wind Farms
Date: Wednesday, May 11, 2022 11:41:15 AM

EXTERNAL SENDER: Do not follow links or open attachments unless you recognize the sender and know the content is safe.

Shasta County Planning Commissioners:

What are the non-political justifications for banning wind farms in Shasta County? There are so many reasons for developing alternate sources of energy that we have to question this action.

All means of producing electricity seem to have drawbacks, from inconveniently unaesthetic (fields of oil pumps, acres of solar panels) to dangerous pollution (coal fired generators), and the windmills seem to be less offensive than these.

With the continuing drought our reliance on hydroelectric power may not be as assured as in the past, just when the higher temperatures we have been experiencing will mean an even greater need for electricity to power our air conditioners. Wind is one of the natural resources we have in Shasta County; it can provide energy with less pollution and, possibly, bring jobs to the area. Why not use it?

We ask that you consider the long-term effects of your actions today. Banning, or even just delaying the development of, energy production here may negatively affect all of us in the future.

Thank you,

Marion and Betty Harner

Sent from [Mail](#) for Windows

From: [Nancy Kirkland](#)
To: [SCPlanning](#)
Subject: Vote YES on Resolution No. 2022-014
Date: Wednesday, May 11, 2022 5:30:12 PM

EXTERNAL SENDER: Do not follow links or open attachments unless you recognize the sender and know the content is safe.

Please recommend that the Board of Supervisors adopt the ordinance amending title 17, Zoning Plan to prohibit large wind energy systems within the unincorporated areas of Shasta County.

As heard previously in public hearings for the Fountain Wind Project, pilot testimonials provided conclusive evidence that the turbine fields will prohibit aerial firefighting efforts.

Also, please consider that preparing the ground for turbines includes excavation, hauling components to the sites, much concrete is needed, roads will need to be put in for access, Miles of converter cables and stations would owe needed as well as thousands of gallons of diesel needed to set up and maintain them.

There are verified complaints about the nonstop noise that the turbines generate. Right now, half a million birds and bats are killed yearly by them. Some estimate that these deaths will increase to a million and a half deaths/year within 3 years. Also, consider that there the recycling of the rare-earth metals that are contained within the system have not been well studied. Unfortunately, while other components are recyclable, the blades themselves are not. These blades can reach 351 feet long and require large trucks to transport them. Currently, the life of a wind turbine is only 20 years.

The actual CO2 savings that these wind farms are designed to reduce are miniscule, due to the inherent nature of wind energy. There is a study by BENTEK (How Less Became More) which has found that ZERO scientific empirical proof provided by the wind industry to support their claims of consequential CO@ reduction. How much CO2 is generated by a half - two million pound concrete base for each turbine?

Turbines do not provide local jobs nor will they provide 'low cost' energy. Wind energy is much more expensive than anything we have now. Wind is 100% undependable as well. We can never depend on wind to blow consistently or within a certain range.

Energy sources should be abundant, reliable, and low-cost. Wind energy does not fit the need. Wind energy is our least sustainable form of energy-it depends on fossil fuel for construction, delivery, maintenance, and operation.

Please vote YES on Resolution No. 2022-014 on Thursday, May 12.

Thank you, Nancy Kirkland: a Shasta County resident

From: [Michael Knight](#)
To: [SCPlanning](#)
Subject: vote yes on Resolution No. 2022-014
Date: Thursday, May 12, 2022 6:56:15 AM

EXTERNAL SENDER: Do not follow links or open attachments unless you recognize the sender and know the content is safe.

I strongly ask you to vote Yes on Resolution No. 2022-014.

We must do everything in our power ahead of time to reduce the danger of out-of-control wildfires and this area is ripe for one again. Having these huge towers up in this area is an invitation for disaster. Shasta county, not the corporation who owns the towers, will be the one who pays and suffers if wildfire occurs. Stay true to Shasta county residents and keep us safe. Money can be garnered in safer ways than selling us out.

Thank you.

Michael Knight
Round Mountain, CA

knighttoday@gmail.com

From: [Michael Koterba](#)
To: [SCPlanning](#)
Subject: Windmill Ban
Date: Tuesday, May 10, 2022 7:21:04 AM

EXTERNAL SENDER: Do not follow links or open attachments unless you recognize the sender and know the content is safe.

Dear Council Members

To simply ban windmills strikes me as a knee-jerk reaction that reduces the likelihood we will ever have clean sustainable renewable energy at a reasonable cost. We already are losing our ability to produce hydroelectric energy as we have more frequent and multi annual years of drought and reservoirs remain at levels too low to provide consistent electrical power generation. Solar and wind are the only suitable local alternatives. So actions such as this simply mean we will depend on others for our power generation. So who will that be? Companies such as PGE who will simply charge what they want to ensure their stockholders make a profit at our expense. For a county that continuously bristles at outsiders dictating how we live I find actions such as this to be simply demonstrating that we actually haven't got the will to control locally what we really need to be sustainability independent.

From: [Barbara Lawson](#)
To: [SCPlanning](#)
Subject: Wind Developments
Date: Wednesday, May 11, 2022 6:00:12 PM

EXTERNAL SENDER: Do not follow links or open attachments unless you recognize the sender and know the content is safe.

Dear Madam or Sirs,
Please, **vote yes** on Resolution No. 2022-014.
Thank you
B. A. Lawson
Shasta County Resident

RESOLUTION NO. 2022-003

**RESOLUTION OF INTENTION OF THE SHASTA COUNTY PLANNING
COMMISSION TO CONSIDER AMENDMENTS TO THE SHASTA COUNTY
ZONING PLAN REGULATING LARGE WIND ENERGY SYSTEMS**

WHEREAS, the County of Shasta has adopted a Zoning Plan identified as Title 17 (Zoning) of the Shasta County Code.

WHEREAS, the County of Shasta may make and enforce within its limits all local, police, sanitary, and other ordinances and regulations not in conflict with general laws.

WHEREAS, California Government Code section 65850 authorizes the County of Shasta to adopt ordinances that regulate the use of buildings, structures, and land and the intensity of land uses.

WHEREAS, the Zoning Plan regulates small wind energy systems, which are defined as wind energy conversion systems consisting of a wind turbine, a tower, and associated control or conversion electronics used primarily to reduce on-site consumption of utility power.

WHEREAS, private wind energy production systems not classified as small wind energy systems are regulated by the Zoning Plan as public utilities, which are permissible in all zone districts with the approval of a use permit.

WHEREAS, the adverse impacts of private wind energy production systems not classified as small wind energy systems, particularly with respect to wildfire, aerial firefighting, aesthetics, biological resources, and historical, cultural, and tribal resources, are of significant concern to many residents of Shasta County as evidenced by the numerous public comments received regarding the proposed Fountain Wind Project between 2019 and 2021.

WHEREAS, the vast majority of the unincorporated area of Shasta County is designated as being in the High and Very High Fire Hazard Severity Zones as recommended by the California Department of Forestry and Fire Protection.

WHEREAS, the Shasta County Planning Commission is of the opinion that private wind energy production systems not classified as small wind energy systems are incompatible in the High and Very High Fire Hazard Severity Zones.

WHEREAS, amendments to the Zoning Plan to define and regulate private wind energy production systems not classified as small wind energy systems in the unincorporated area of Shasta County, should be considered, in furtherance of the public necessity, convenience, and general welfare.

NOW, THEREFORE, BE IT RESOLVED, that the Shasta County Planning Commission, pursuant to section 17.92.080(B) of the Shasta County Code, hereby intends to consider amendments to the Zoning Plan to regulate private wind energy production systems not classified as small wind energy systems in furtherance of the public necessity, convenience, and general welfare.

BE IT FURTHER RESOLVED, that such proposed regulations consist of defining private wind energy production systems not classified as small wind energy systems as large wind energy systems and prohibiting the development of such systems in the unincorporated area of Shasta County.

BE IT FURTHER RESOLVED, that the Shasta County Department of Resource Management is directed to study the matter, propose amendments to the Zoning Plan, and submit any proposed amendments to the Shasta County Planning Commission, in accordance with section 17.92.080 of the Shasta County Code, for the Planning Commission's consideration and recommended action.

DULY PASSED AND ADOPTED this 13th day of January 2022, by the following vote:

AYES: CHAPIN, KERNS, MACLEAN, WALLNER

NOES:

ABSENT: WALGAMUTH

ABSTAIN:

RECUSE:



TIM MACLEAN, Chair
Planning Commission
County of Shasta, State of California

ATTEST:



PAUL A. HELLMAN, Secretary
Planning Commission
County of Shasta, State of California

RESOLUTION NO. 2022-014

**A RESOLUTION OF THE SHASTA COUNTY PLANNING COMMISSION
RECOMMENDING THAT THE SHASTA COUNTY BOARD OF SUPERVISORS
APPROVE ZONE AMENDMENT 22-0001
REGULATING SMALL AND LARGE WIND ENERGY SYSTEMS**

WHEREAS, the County of Shasta (County) has adopted a Zoning Plan identified as Title 17 (Zoning) of the Shasta County Code (SCC); and

WHEREAS, based on Planning Commission Resolution No. 2022-003, a resolution of intention to consider amendments to the Shasta County Zoning Plan to prohibit wind energy conversion systems other than small wind energy systems, County staff drafted an ordinance to define wind energy conversion systems not classified as small wind energy systems as large wind energy systems and to prohibit the development of such systems in the unincorporated area of Shasta County; and

WHEREAS, duly noticed public hearings were held on April 14, 2022, and May 12, 2022, at which time all interested persons were given an opportunity to comment and those comments were considered by the Planning Commission.

WHEREAS, the Shasta County Planning Commission has considered public comments and a report from the Planning Division.

NOW, THEREFORE BE IT RESOLVED, by the Shasta County Planning Commission that:

1. The foregoing recitals are true and correct.
2. The Planning Commission has independently reviewed and considered the proposed zone amendment, together with all public comments and a report from the Planning Division.
3. Adoption of the ordinance is not subject to the California Environmental Quality Act (CEQA) pursuant to State CEQA Guidelines section 15060(c)(2) since it can be seen with certainty that this ordinance will not result in a direct or reasonably foreseeable indirect physical change in the environment.
4. The proposed Zone Amendment is consistent with the Shasta County General Plan on the basis that the ordinance prohibits a type of development that is incompatible in high risk fire hazard areas from locating in such areas (Objective FS-1), protects the natural scenery along scenic highways from new development which would diminish the aesthetic value of the scenic corridor (Objective SH-1), and guides development in a pattern that will respect the natural resource values of County lands and their contributions to the County's economic base and that will minimize land use conflicts between adjacent land uses (Objectives CO-3 & CO-4).
5. The Planning Commission recommends that the Shasta County Board of Supervisors introduce, waive the reading of, and enact an ordinance amending the Zoning Plan of the County of Shasta, identified as Zone Amendment 22-0001, by adding SCC Section 17.88.335 to define and prohibit large wind energy systems within the unincorporated area of Shasta County, amending SCC Section 17.88.035 to modify the definition of, and development regulations for, small wind energy systems, and amending SCC Section 17.88.100 to exclude large wind energy systems from being a permissible public utility with the approval of a use permit.

DULY PASSED AND ADOPTED this 12th day of May, 2022, by the following vote:

AYES:

NOES:

ABSENT:

ABSTAIN:

RECUSE:

TIM MACLEAN, Chair
Planning Commission
County of Shasta, State of California

ATTEST:

PAUL A. HELLMAN, Secretary
Planning Commission
County of Shasta, State of California

STRIKEOUT VERSION OF ORDINANCE NO. SCC 2022-_____

**AN ORDINANCE OF THE BOARD OF SUPERVISORS
OF THE COUNTY OF SHASTA
REGULATING SMALL AND LARGE WIND ENERGY SYSTEMS**

The Board of Supervisors of the County of Shasta ordains as follows:

SECTION I.

Section 17.88.035, “Small wind energy systems,” of the Shasta County Code is amended as follows:

Small wind energy systems may be permitted with either an approved administrative permit or use permit, subject to the following requirements. ~~Wind energy systems which do not meet the following requirements may be permitted with an approved use permit.~~

A. The following definitions govern this section:

“Small wind energy system” means a wind energy conversion system consisting of a wind turbine(s), a tower(s), and associated control or conversion electronics, ~~which has a rated capacity that does not exceed the allowable rated capacity under the Emerging Renewables Fund of the Renewables Investment Plan administered by the California Energy Commission, and~~ which will be used primarily to reduce on-site consumption of utility electricity obtained via the electric grid or to enable on-site generation of electricity in lieu of connecting to the electric grid.

“Tower height” means the height above grade of the fixed position of the tower, excluding the wind turbine.

- B. One wind turbine may be permitted with an approved administrative permit. Two or more wind turbines may be permitted with an approved use permit.
- C. With an approved administrative permit, Tower heights of not more than sixty-five feet shall be allowed on parcels between one and five acres, and tower heights of not more than eighty feet shall be allowed on parcels of greater than five acres or more, provided that the application includes evidence that the proposed height does not exceed the height recommended by the manufacturer or distributor of the system. Tower heights in excess of the aforementioned limits may be permitted with an approved use permit.
- D. Setbacks for the system tower from the property line shall be no less than the height of the system, provided that it also complies with any applicable fire setback requirements including, but not limited to, pursuant to Section 4290 of the Public Resources Code as it may be amended from time to time.

- E. Decibel levels for the system shall not exceed the noise standards established in the Noise Element of the General Plan, except during short-term events such as utility outages and severe wind storms.
- ~~F. The system's turbine must have been approved by the California Energy Commission as qualifying under the Emerging Renewables Fund of the Commissions' Renewables Investment Plan or certified by a national program recognized and approved by the Energy Commission.~~
- ~~G. The application shall include standard drawings and an engineering analysis of the system's tower, showing compliance with the Uniform Building Code or the California Building Standards Code and certification by a professional mechanical, structural, or civil engineer licensed by this state. However, a wet stamp shall not be required, provided that the application demonstrates that the system is designed to meet the most stringent wind requirements (Uniform Building Code wind exposure D), the requirement for the worst seismic class (Seismic 4), and the weakest soil class, with a soil strength of not more than one thousand pounds per square foot, or other relevant conditions normally required by the current Building Code as adopted by the county.~~
- F. The system shall comply with all applicable Federal Aviation Administration requirements, including Subpart B (commencing with Section 77.11) of Part 77 of Title 14 of Code of Federal Regulations regarding installations close to airports, and the State Aeronautics Act (Part 1 [commencing with Section 21001] of Division 9 of the Public Utilities Code) as those requirements may be amended from time to time.
- ~~G. The application shall include a line drawing of the electrical components of the system in sufficient detail to allow for a determination that the manner of installation conforms to the National Electric Code.~~
- G. The applicant shall provide information demonstrating that the system will be used primarily to reduce on-site consumption of electricity obtained via the electric grid or to enable on-site generation of electricity in lieu of connecting to the electric grid. The application shall include evidence, unless the applicant does not plan to connect the system to the electricity grid, that the electric utility service provider that serves the proposed site has been informed of the applicant's intent to install an interconnected customer-owned electricity generator.
- H. A small wind energy system shall not be allowed where otherwise prohibited by any of the following:
 - 1. A comprehensive land use plan and implementing regulations adopted by an airport land use commission pursuant to Article 3.5 (commencing with Section 21670) of Chapter 4 of Division 9 of Part 1 of the Public Utilities Code.
 - 2. The Alquist-Priolo Earthquake Fault Zoning Act, Chapter 7.5 (commencing with Section 2621) of Division 2 of the Public Resources Code.

3. The county to protect the scenic appearance of the scenic highway corridor pursuant to Article 2.5 (commencing with Section 260) of Chapter 2 of Division 1 of Streets and Highways Code.
 4. The terms of a conservation easement entered into pursuant to the Open-space Easement Act of 1974, Chapter 6.6 (commencing with Section 51070) of Division 1 of Title 5 of the Government Code.
 5. The terms of an agricultural conservation easement entered into pursuant to the California Farmland Conservancy Program Act, Division 10.23 (commencing with Section 10200) of the Public Resources Code.
 6. The terms of a contract entered into pursuant to the Williamson Act, Chapter 7 (commencing with Section 51200) of Division 1 of Title 5 of the Government Code.
 7. The listing of the proposed site in the National Register of Historic Places or the California Register of Historical Resources pursuant to Section 5024.1 of the Public Resources Code.
- I. In the event a small wind energy system is proposed to be sited in an agricultural area that may have aircraft operating at low altitudes, the county may take reasonable steps, concurrent with other notices issued pursuant to this subdivision, to notify aircraft pilots registered to operate in the county pursuant to Section 11921 of the Food and Agriculture Code as it may be amended from time to time.

SECTION II.

Section 17.88.100, "Public uses, public utilities, and high voltage electrical transmission and distribution projects," of the Shasta County Code is amended as follows:

- A. High voltage electrical transmission and distribution projects are permitted if a use permit is issued. Section 17.92.025 of this title governs those projects and sets forth various standards and requirements for applications, permit review, and related matters. In some cases, state and federal laws may regulate certain types or characteristics of these projects. This section shall be construed to provide the county with the maximum control consistent with such other laws.
- B. Public uses and public utilities, with the exception of large wind energy systems as defined in subsection 17.88.335.B. of this chapter, are permitted if a use permit is issued, except that public utility transmission lines, towers, distribution poles and lines, regardless of height, and gas pipelines, which are not associated with high voltage electrical transmission and distribution projects, are permitted uses.

- C. A use permit shall not be issued for a public use or utility or a high voltage electrical transmission and distribution project in a resource district unless findings are made that there is not a reasonable alternative site outside of a resource district, and the impacts from the project on the resource land have been reduced to the lowest reasonable level.
- D. Notwithstanding subsections A and B and C of this section and Section 17.94.040, minor additions or alterations to existing public utility facilities or high voltage electrical transmission and distribution projects, such as construction of small, unmanned buildings or addition of microwave dishes to an existing tower, are permitted uses, and shall not require amendment of a use permit.
- E. Notwithstanding subsections A and B and C of this section, small, new public utility facilities or small, new facilities associated with existing high voltage electrical transmission and distribution projects, such as unmanned telecommunication relay or booster stations, are permitted if an administrative permit is issued.

SECTION III.

Section 17.88.335, Large wind energy systems,” is added to the Shasta County Code as follows:

17.88.335 Large wind energy systems.

A. Legislative Findings.

The Board of Supervisors finds as follows:

1. California Government Code section 65850 authorizes the County of Shasta to adopt ordinances that regulate the use of buildings, structures, and land and the intensity of land uses.
2. Pursuant to Article XI, Section 7, of the California Constitution, the County of Shasta may adopt and enforce ordinances and regulations not in conflict with general laws to protect and promote the public health, safety, and general welfare of its citizens.
3. The adverse impacts of large wind energy systems, particularly with respect to wildfire, aerial firefighting, aesthetics, biological resources, and historical, cultural, and tribal resources, are of significant concern to many residents of Shasta County as evidenced by the numerous public comments received between 2019 and 2021 regarding the proposed Fountain Wind Project.
4. The vast majority of the unincorporated area of Shasta County is designated as being in the High and Very High Fire Hazard Severity Zones as recommended by the California Department of Forestry and Fire Protection. Large wind energy systems are incompatible in the High and Very High Fire Hazard Severity Zones.

5. Regulations are needed to protect the public health, safety, and welfare of residents from the adverse impacts of large wind energy systems.
6. The Board of Supervisors enacts this section to prohibit large wind energy systems in furtherance of the public necessity, health, safety, convenience, and general welfare.

B. Definitions.

The following definition governs this section:

“Large wind energy system” means a wind energy conversion system that is not defined as a small wind energy system pursuant to subsection 17.88.035.A. of this chapter.

C. Prohibition.

Large wind energy systems are prohibited in all zone districts of the unincorporated area of the County of Shasta and no permit or approval of any type shall be issued therefor.

SECTION IV.

The County finds that this ordinance is not subject to the California Environmental Quality Act (CEQA) pursuant to State CEQA Guidelines section 15060(c)(2) since it can be seen with certainty that this ordinance will not result in a direct or reasonably foreseeable indirect physical change in the environment.

SECTION V.

If any section, subsection, sentence, clause, phrase, or provision of this ordinance or its application to any person or circumstance is held invalid for any reason, the invalidity does not affect other provisions or applications of this ordinance that can be given effect without the invalid provision or application, and to this end the provisions of this ordinance are severable. The Board of Supervisors hereby declares that it would have passed this ordinance and every section, subsection, sentence, clause, phrase, or provision thereof irrespective of the fact that any one or more sections, subsections, sentences, clauses, phrases, or provisions be declared unconstitutional or invalid.

SECTION VI.

All former ordinances and resolutions, or parts thereof, conflicting or inconsistent with the provisions of this ordinance are hereby superseded by this ordinance. The adoption of this ordinance shall not in any manner affect any action or prosecution for violation of ordinances, which violations were committed prior to the effective date hereof, be construed as a waiver of any license, fee, or penalty required by or resulting from any such ordinance,

or affect the validity of any bond (or cash deposit in lieu thereof) required to be posted, filed, or deposited pursuant to such ordinance.

SECTION VII.

This ordinance shall take effect and be in full force and effect 30 days after its passage. The Clerk shall cause this ordinance to be published as required by law.

DULY PASSED AND ADOPTED this XX day of XXXX, 2022, by the Board of Supervisors of the County of Shasta, State of California, by the following vote:

AYES: X
NOES: X
ABSENT: X
ABSTAIN: X
RECUSE: X

LES BAUGH, CHAIR
Board of Supervisors
County of Shasta
State of California

ATTEST:

MATTHEW P. PONTES
Clerk of the Board of Supervisors

By: _____
Deputy

ORDINANCE NO. SCC 2022-_____

**AN ORDINANCE OF THE BOARD OF SUPERVISORS
OF THE COUNTY OF SHASTA
REGULATING SMALL AND LARGE WIND ENERGY SYSTEMS**

The Board of Supervisors of the County of Shasta ordains as follows:

SECTION I.

Section 17.88.035, “Small wind energy systems,” of the Shasta County Code is amended as follows:

Small wind energy systems may be permitted with either an approved administrative permit or use permit, subject to the following requirements.

A. The following definitions govern this section:

“Small wind energy system” means a wind energy conversion system consisting of a wind turbine(s), a tower(s), and associated control or conversion electronics which will be used to reduce on-site consumption of utility electricity obtained via the electric grid or to enable on-site generation of electricity in lieu of connecting to the electric grid.

“Tower height” means the height above grade of the fixed position of the tower, excluding the wind turbine.

- B. One wind turbine may be permitted with an approved administrative permit. Two or more wind turbines may be permitted with an approved use permit.
- C. With an approved administrative permit, tower heights of not more than sixty-five feet shall be allowed on parcels between one and five acres, and tower heights of not more than eighty feet shall be allowed on parcels greater than five acres, provided that the application includes evidence that the proposed height does not exceed the height recommended by the manufacturer or distributor of the system. Tower heights in excess of the aforementioned limits may be permitted with an approved use permit.
- D. Setbacks for the system tower from the property line shall be no less than the height of the system, provided that it also complies with any applicable fire setback requirements including, but not limited to, Section 4290 of the Public Resources Code as it may be amended from time to time.
- E. Decibel levels for the system shall not exceed the noise standards established in the Noise Element of the General Plan, except during short-term events such as utility outages and severe wind storms.

- F. The system shall comply with all applicable Federal Aviation Administration requirements, including Subpart B (commencing with Section 77.11) of Part 77 of Title 14 of Code of Federal Regulations regarding installations close to airports, and the State Aeronautics Act (Part 1 [commencing with Section 21001] of Division 9 of the Public Utilities Code) as those requirements may be amended from time to time.
- G. The applicant shall provide information demonstrating that the system will be used to reduce on-site consumption of electricity obtained via the electric grid or to enable on-site generation of electricity in lieu of connecting to the electric grid. The application shall include evidence, unless the applicant does not plan to connect the system to the electric grid, that the electric utility service provider that serves the proposed site has been informed of the applicant's intent to install an interconnected customer-owned electricity generator.
- H. A small wind energy system shall not be allowed where otherwise prohibited by any of the following:
 - 1. A comprehensive land use plan and implementing regulations adopted by an airport land use commission pursuant to Article 3.5 (commencing with Section 21670) of Chapter 4 of Division 9 of Part 1 of the Public Utilities Code.
 - 2. The Alquist-Priolo Earthquake Fault Zoning Act, Chapter 7.5 (commencing with Section 2621) of Division 2 of the Public Resources Code.
 - 3. The county to protect the scenic appearance of the scenic highway corridor pursuant to Article 2.5 (commencing with Section 260) of Chapter 2 of Division 1 of Streets and Highways Code.
 - 4. The terms of a conservation easement entered into pursuant to the Open-space Easement Act of 1974, Chapter 6.6 (commencing with Section 51070) of Division 1 of Title 5 of the Government Code.
 - 5. The terms of an agricultural conservation easement entered into pursuant to the California Farmland Conservancy Program Act, Division 10.23 (commencing with Section 10200) of the Public Resources Code.
 - 6. The terms of a contract entered into pursuant to the Williamson Act, Chapter 7 (commencing with Section 51200) of Division 1 of Title 5 of the Government Code.
 - 7. The listing of the proposed site in the National Register of Historic Places or the California Register of Historical Resources pursuant to Section 5024.1 of the Public Resources Code.
- I. In the event a small wind energy system is proposed to be sited in an agricultural area that may have aircraft operating at low altitudes, the county may take reasonable steps,

concurrent with other notices issued pursuant to this subdivision, to notify aircraft pilots registered to operate in the county pursuant to Section 11921 of the Food and Agriculture Code as it may be amended from time to time.

SECTION II.

Section 17.88.100, “Public uses, public utilities, and high voltage electrical transmission and distribution projects,” of the Shasta County Code is amended as follows:

- A. High voltage electrical transmission and distribution projects are permitted if a use permit is issued. Section 17.92.025 of this title governs those projects and sets forth various standards and requirements for applications, permit review, and related matters. In some cases, state and federal laws may regulate certain types or characteristics of these projects. This section shall be construed to provide the county with the maximum control consistent with such other laws.
- B. Public uses and public utilities, with the exception of large wind energy systems as defined in subsection 17.88.335.B. of this chapter, are permitted if a use permit is issued, except that public utility transmission lines, towers, distribution poles and lines, regardless of height, and gas pipelines, which are not associated with high voltage electrical transmission and distribution projects, are permitted uses.
- C. A use permit shall not be issued for a public use or utility or a high voltage electrical transmission and distribution project in a resource district unless findings are made that there is not a reasonable alternative site outside of a resource district, and the impacts from the project on the resource land have been reduced to the lowest reasonable level.
- D. Notwithstanding subsections A and B and C of this section and Section 17.94.040, minor additions or alterations to existing public utility facilities or high voltage electrical transmission and distribution projects, such as construction of small, unmanned buildings or addition of microwave dishes to an existing tower, are permitted uses, and shall not require amendment of a use permit.
- E. Notwithstanding subsections A and B and C of this section, small, new public utility facilities or small, new facilities associated with existing high voltage electrical transmission and distribution projects, such as unmanned telecommunication relay or booster stations, are permitted if an administrative permit is issued.

SECTION III.

Section 17.88.335, Large wind energy systems,” is added to the Shasta County Code as follows:

17.88.335 Large wind energy systems.

A. Legislative Findings.

The Board of Supervisors finds as follows:

1. California Government Code section 65850 authorizes the County of Shasta to adopt ordinances that regulate the use of buildings, structures, and land and the intensity of land uses.
2. Pursuant to Article XI, Section 7, of the California Constitution, the County of Shasta may adopt and enforce ordinances and regulations not in conflict with general laws to protect and promote the public health, safety, and general welfare of its citizens.
3. The adverse impacts of large wind energy systems, particularly with respect to wildfire, aerial firefighting, aesthetics, biological resources, and historical, cultural, and tribal resources, are of significant concern to many residents of Shasta County as evidenced by the numerous public comments received between 2019 and 2021 regarding the proposed Fountain Wind Project.
4. The vast majority of the unincorporated area of Shasta County is designated as being in the High and Very High Fire Hazard Severity Zones as recommended by the California Department of Forestry and Fire Protection. Large wind energy systems are incompatible in the High and Very High Fire Hazard Severity Zones.
5. Regulations are needed to protect the public health, safety, and welfare of residents from the adverse impacts of large wind energy systems.
6. The Board of Supervisors enacts this section to prohibit large wind energy systems in furtherance of the public necessity, health, safety, convenience, and general welfare.

B. Definitions.

The following definition governs this section:

“Large wind energy system” means a wind energy conversion system that is not defined as a small wind energy system pursuant to subsection 17.88.035.A. of this chapter.

C. Prohibition.

Large wind energy systems are prohibited in all zone districts of the unincorporated area of the County of Shasta and no permit or approval of any type shall be issued therefor.

SECTION IV.

The County finds that this ordinance is not subject to the California Environmental Quality Act (CEQA) pursuant to State CEQA Guidelines section 15060(c)(2) since it can be seen with certainty that this ordinance will not result in a direct or reasonably foreseeable indirect physical change in the environment.

SECTION V.

If any section, subsection, sentence, clause, phrase, or provision of this ordinance or its application to any person or circumstance is held invalid for any reason, the invalidity does not affect other provisions or applications of this ordinance that can be given effect without the invalid provision or application, and to this end the provisions of this ordinance are severable. The Board of Supervisors hereby declares that it would have passed this ordinance and every section, subsection, sentence, clause, phrase, or provision thereof irrespective of the fact that any one or more sections, subsections, sentences, clauses, phrases, or provisions be declared unconstitutional or invalid.

SECTION VI.

All former ordinances and resolutions, or parts thereof, conflicting or inconsistent with the provisions of this ordinance are hereby superseded by this ordinance. The adoption of this ordinance shall not in any manner affect any action or prosecution for violation of ordinances, which violations were committed prior to the effective date hereof, be construed as a waiver of any license, fee, or penalty required by or resulting from any such ordinance, or affect the validity of any bond (or cash deposit in lieu thereof) required to be posted, filed, or deposited pursuant to such ordinance.

SECTION VII.

This ordinance shall take effect and be in full force and effect 30 days after its passage. The Clerk shall cause this ordinance to be published as required by law.

DULY PASSED AND ADOPTED this XX day of XXXX, 2022, by the Board of Supervisors of the County of Shasta, State of California, by the following vote:

AYES: X
NOES: X
ABSENT: X
ABSTAIN: X
RECUSE: X

LES BAUGH, CHAIR
Board of Supervisors
County of Shasta
State of California

ATTEST:

MATTHEW P. PONTES
Clerk of the Board of Supervisors

By: _____
Deputy

April 13, 2022

Shasta County Planning Commission
1855 Placer St Suite 103,
Redding, CA 96001

*Re: Proposed Amendments to Shasta County Zoning Code to Prohibit Large Wind
Energy Systems*

Dear Chair and Members of the Planning Commission:

This firm represents ConnectGen LLC. ConnectGen LLC is a leading developer of renewable energy with projects throughout the United States. I am writing about the proposed amendments to Shasta County's zoning code (Zone Amendment 22-0001) which, if approved, would prohibit "private wind energy production systems not classified as small wind energy systems" (also referred to as "large wind energy systems") in almost all areas of unincorporated Shasta County. The Planning Commission is scheduled to hear this item at its April 14, 2022 regularly scheduled meeting.

Poor Public Policy. There are compelling policy reasons why Shasta County should not adopt the proposed zoning code amendments:

- Large wind energy systems can safely and compatibly be developed in Shasta County, including in areas of high fire risk.
- Shasta County's professional planning staff recommended approval of both the Hatchett Ridge and Fountain Wind Project because they determined, based on substantial and highly credible evidence that, properly designed and mitigated, large wind energy systems are compatible with high fire risk lands and are not detrimental to health, safety, peace, morals, comfort and general welfare of persons residing or working in the neighborhood or be detrimental or injurious to property or improvements in the neighborhood or to the general welfare of the County.
- No wildfires have resulted from the construction and operation of the Hatchett Ridge project, which has been operational for over 10 years. There is simply no basis to conclude that other wind projects will cause wildfires.
- Small wind energy systems do not supply electricity to the retail market and do appreciably reduce carbon emissions on regional or statewide scale
- Large wind energy systems are a critical part of how California plans to address climate change, which will help reduce wildfire risk.

- Electricity produced from large wind energy systems displaces carbon emissions from fossil fuel power plants.
- Large wind energy systems create jobs and substantial tax benefits for Shasta County.
- Under the existing zoning code, the County can already carefully consider individual large wind energy systems on their merits through the conditional use permit process.

Violation of CEQA. In addition to these policy reasons, there are legal reasons the County should not proceed with the proposed amendments. Based on the current record, adoption of these zoning changes without environmental review would violate the California Environmental Quality Act (CEQA), Public Resources Code section 21100 et seq. Unless a project is exempt, CEQA requires an agency to conduct an environmental review to determine whether a project may have a significant effect on the environment. *Muzzy Ranch Co. v. Solano County Airport Land Use Commission* (2007) 41 Cal. App. 4th 372 at 380-381.) A "[s]ignificant effect on the environment" means a substantial, or potentially substantial, *adverse change in the environment*." Public Resources Code section 21068, italics added.) The Guidelines define "[s]ignificant effect on the environment" as "a substantial, or potentially substantial, *adverse change* in any of the physical conditions within the area affected by the project including land [and] . . . flora" (Guidelines, § 15382, italics added.)

Draft Resolution 2022-013 claims that Zone Amendment 22-0001 is exempt pursuant to CEQA Guidelines sections 15060(c)(2) since "it can be seen with certainty that this ordinance will not result in a direct or reasonably foreseeable indirect physical change in the environment." But this exemption -- known as the "common sense exemption" -- does not apply here for the reasons stated below. Before it can approve these amendments, the County is therefore required to prepare an environmental document in compliance with CEQA.¹

In its entirety, CEQA Guidelines section 15061, subdivision (b)(3) provides: "(b) A project is exempt from CEQA if: [¶] . . . [¶] (3) The activity is covered by the general rule that CEQA applies only to projects which have the potential for causing a significant effect on the environment. Where it can be seen with certainty that there is no possibility that the activity in question may have a significant effect on the environment, the activity is not subject to CEQA."

The common sense exemption can be relied on only if a factual evaluation of the agency's proposed activity reveals that it applies. *Davidon Homes vs City of San Jose* (1997) 54 Cal. App, 4th 106 at 114. The agency invoking the exemption has the burden of demonstrating that it applies. *Id.* at p. 116. Further, it applies only when it is *undisputed* that a project will enhance rather than degrade existing environmental conditions. *CREED-21 v. City of San Diego* (215) 234 Cal. App. 4th 488, 512.

As recognized by the leading treatise on CEQA (see Kostka & Zischke, *Practice under the Environmental Quality Act*, CEB, section 5.112) certain projects ostensibly adopted to protect or

¹ As a threshold matter, the proposed amendment of the zoning ordinance clearly constitutes a "project" subject to CEQA. The staff report makes no argument that the amendment is not a project and immediately addresses the second tier of analysis—whether the project is exempt from CEQA under the commonsense exemption.

improve the environment can have collateral effects on the environment that preclude application of the exemption. As a result, agencies cannot simply assume that measures intended to protect the environment are entirely benign. For example, the court in *Dunn-Edwards Corp. v. Bay Area Air Quality Management District* (1992) 9 Cal. App. 4th 644 overturned amendments to air district regulations designed to reduce the amount of volatile organic carbons (VOCs) in paint and other architectural coatings for failure to comply with CEQA. Because there was evidence that the new regulations would require lower quality products that would result in a net increase in VOC emissions, an exemption under 14 Cal Code Regs §15061(b)(3) was held to be improper. See also *Muzzy Ranch Co. v. Solano County Airport Land Use Commission*, supra, 41 Cal. App. 4th 372 at 380-381 (displacement of development pressure can be environmental impact, but common sense exemption applied to airport land use plan but chiefly because it kept preexisting designations in place); *Wildlife Alive v. Chickering* (1976) 18 Cal. 3d 190 (Fish and Game Commission action setting fishing and hunting seasons has potential for both beneficial and adverse effects on survival of certain species); *Building Code Action v. Energy Resources Coserv. & Dev. Comm'n* (1980) 102 CA 3d 577 (adoption of energy conservation regulations establishing double-glazing standards for new residential construction could have significant impact on air quality as result of increased glass production).

Here, the County's zoning code currently allows wind energy generation projects as a "public utility" in any zoning district with a conditional use permit. As in the *Dunn-Edwards* case and in stark contrast to the *Muzzy Ranch* case (which merely maintained existing zoning regulations and did not change them), the amendments here propose a prohibition on large scale wind energy in the vast majority of the unincorporated area of Shasta County where they are currently conditionally allowed. Draft Resolution 2022-013 defends the application of the common sense exemption on the ground that the prohibition would potentially educe wildfire risk and reduce biological and other impacts *in the County*. However, the Resolution fails to address or acknowledge the indirect but very real adverse regional and statewide impacts of precluding the potential development of approximately 2012 MW of emissions-free wind energy in Shasta County.² Precluding the development of these wind energy projects could result in a lost opportunity to displace 2,143,241 metric tons of CO₂ per year, the equivalent of removing 461,802 gasoline powered passenger vehicles driven for one year³ from the road as well as thwart the California Public Utility Commission's Adopted Plan for procurement of approximately 3500 MW of on-shore wind by 2025. This prohibition would also thwart the State of California's goals contained in SB 100 requiring renewable energy and zero-carbon resources to supply 100% of electric retail sales to end use customers by 2045. It would also undermine the state's goal of reducing GHG emissions by 40% by 2030 compared to 1990 levels under AB 32. A prohibition on all large wind energy systems in Shasta County would also undermine the Shasta County Air Quality Management District's Regional Climate Action Plan

² This figure is derived from the number of acres of private land in the unincorporated part of the County where wind speed would be commercial (above 6 m/s) based on California Energy Commission and National Renewal Energy Laboratories wind maps, then assuming 80 acres per MW.

³ <https://www.epa.gov/energy/greenhouse-gas-equivalencies-calculator>

which reduce community GHG emissions to 49% below 2008 levels by 2035 (i.e. 291,340 MT CO₂e/yr.) This loss of clean electricity from large wind energy systems that could be produced in Shasta County could lead to higher levels of carbon emissions for a longer period, a diminished capacity to slow global warming and potentially higher risk of wildfires. Furthermore, the conclusion that the prohibition would potentially reduce wildfire risk ignores the record from the Fountain Wind conditional use permit which demonstrated that project actually enhanced the fire safety in the area of the project. The record also demonstrated that any impacts to wildlife would be mitigated under CEQA and applicable state and federal laws.

Given these potential results, it is abundantly clear that it *cannot* be seen *with certainty* that there is *no possibility* that the proposed amendments to the zoning code may have a significant effect on the environment. To the contrary, the proposed amendments *quite possibly* may have an adverse impact on the state's ability to address climate change, fight wildfires and reduce carbon emissions, all of which could result in significant adverse impacts on the environment. As such, the common sense exemption does not apply and the County must prepare an environmental analysis in compliance with CEQA before approving such amendments.

Inconsistent with the General Plan. Approval of these amendments would also be in violation of state planning law requiring that the zoning code be consistent with the General Plan. Shasta County's General Plan recognizes that renewable energy, including wind energy, are important features in the County's energy future. An outright prohibition on large wind energy systems would be inconsistent with the stated importance of renewable energy, including wind energy in the County's General Plan:

"Renewable energy resources, coupled with strategies to encourage conservation, are important features in the Shasta County region's energy future. In 2002, the Governor signed the Renewable Portfolio Standard (RPS), SB 1078. This standard requires an annual increase in renewable generation equivalent to at least 1 percent of electricity sales, with an aggregate goal of 20 percent by 2017. Currently renewable generation accounts for 11 percent of retail sales. California's Energy Action Plan has targeted a goal of 20 percent by 2010. 21 Achieving the RPS could displace 20,000 tons of nitrogen oxide (Nox) emissions from gas and coal-fired generation in the Western states over the 2004-2013 time frame. Also, the use of renewable resources can reduce carbon dioxide and greenhouse gas emissions associated with global climate change. Generation of electricity from renewable energy rather than by fossil fuels can reduce CO₂ and other green-house gas emissions associated with climate change. Model simulations in one instance indicate that achieving the RPS by 2010 could reduce annual CO₂ emissions by about 62 million tons by 2013. This is equivalent to estimated annual CO₂ emissions from more than 6 million automobiles. Geothermal energy provides the largest portion of renewable electricity in California where such generation is by systems 30 MW or smaller. Renewable energy (excluding small and large hydropower) provided four percent for the region's energy production in the Western Electricity Coordinating Council (WECC) states. If renewable energy could be used to replace the estimated growth in gas-fired generation from 2004- 2017, the total amount of

renewable energy by 2017 would reach about 38 percent. This would make renewable energy the largest source of electricity generation in California. Overall, existing renewable energy facilities utilize a small proportion of the technical potential for renewable energy in California.

Important renewable energy sources in Shasta County include solar, hydroelectricity, biomass, and cogeneration. There is also potential for development of wind, geothermal, and waste-to-energy as alternative sources of energy production. Technology improvements associated with renewable energy development will be a key to its rate of success. Renewable energy sources can be most effectively applied for space heating and cooling and for electrical generation. For the oil dependent transportation sector, renewable energy solutions involve developing marketable alternative fuel types as the cost of oil rises. Collectively, renewable energy offers a diverse and virtually inexhaustible resource, opportunities for developing new base industries, and all at substantially less environmental cost.

Conclusion: The proposal to prohibit all large wind energy systems in almost all of Shasta County based on the common sense exemption would violate CEQA, be poor public policy, and violate state planning and zoning laws requiring consistency with the General Plan. The County already has the ability to use its discretion to allow or disallow specific projects under the conditional use process. For all of the above reasons, we urge the Planning Commission to reject the proposed amendments.

Very truly yours,



Anne E. Mudge

Item R5:

Zone Amendment 22-0001

Regulation of Wind Energy Systems

Background

On January 13, 2022, the Planning Commission adopted a resolution of intention to consider amendments to the Zoning Plan to regulate large wind energy systems.

Resolution of Intention

The adverse impacts of large wind energy systems are of significant concern to many residents of Shasta County as evidenced by the numerous public comments received regarding the Fountain Wind Project.

Resolution of Intention

The vast majority of the unincorporated area of Shasta County is in the High and Very High Fire Hazard Severity Zones.

Resolution of Intention

The Planning Commission is of the opinion that large wind energy systems are incompatible in the High and Very High Fire Hazard Severity Zones.

Resolution of Intention

The Planning Commission directed staff to propose amendments which define and prohibit large wind energy systems.

Draft Ordinance

- Amends definition and regulations for “Small wind energy systems”
- Amends regulations for public utilities
- Adds section defining and prohibiting “Large wind energy systems”

Small Wind Energy Systems

A wind energy conversion system consisting of a wind turbine(s), a tower(s), and associated control or conversion electronics which will be used to reduce on-site consumption of utility electricity or to enable on-site generation in lieu of connecting to the electric grid.

Small Wind Energy Systems

- One turbine permitted with an administrative permit
- Two or more turbines permitted with a use permit

Small Wind Energy Systems

- 65' max. tower height on parcels between 1 and 5 acres
- 80' max. tower height on parcels greater than 5 acres
- Tower heights in excess of these limits would require a use permit

Public Utilities

Precludes large wind energy systems from the provision allowing for public utilities to be permitted with a use permit.

Large Wind Energy Systems

A wind energy conversion system not defined as a small wind energy system.

Large Wind Energy Systems

Prohibited in all zone districts of the
unincorporated area of Shasta County.

Public Comments

In opposition: Michael & Linda Wopat, Carole Crowe,
Doug Mandel, MaryAnn McCrary, Warren Swanson,
North State Climate Action (NSCA),
Shasta Environmental Alliance,
Cox, Castle & Nicholson on behalf of ConnectGen,
California Wind Energy Association

In support: Jim Wiegand

Ron Dykstra/NSCA

- Potential conflicts must be weighed along with the potential benefits to everyone in the County
- Impacts and benefits should be considered on a site-specific basis
- Does not recommend a blanket prohibition

Michael & Linda Wopat

- Evaluate each proposal based on its individual merits
- Do not support a blanket prohibition
- Prohibition would not serve our greater need of addressing clean energy challenges in an ever-changing climate threat

Carole Crowe

- Each proposal should be evaluated separately and appropriate mitigation should be required to reduce negative impacts
- Wind power is a relatively clean energy that can help reduce dependence on fossil fuels
- Prohibiting all large-scale wind energy projects is short-sighted

Doug Mandel

- Wind energy benefits include mitigation of climate change effects, reduction of air pollution, and decreased water use
- Impacts and benefits should be considered on a site-specific basis
- Does not recommend a blanket prohibition

Shasta Environmental Alliance

- Threat of wildfire from wind farms is extremely small and much less than other sources
- Aerial firefighting would be possible if wind farms are located in terrain that is not steep or heavily forested
- Wind farms could be an important source of energy, jobs and taxable income

Shasta Environmental Alliance

- Height limit of 80 feet for small wind energy systems is too restrictive (300-foot limit would be more appropriate)
- Could result in the State Legislature enacting a law banning extremely restrictive ordinances such as this

MaryAnn McCrary

- There are large areas in the County not in a high fire hazard zone
- Mitigations for wind farm impacts are improving
- Need to reduce reliance on fossil fuels that have many negative impacts on the environment and our climate

Warren Swanson

- ?????
- ?????
- ?????

Cox, Castle & Nicholson/ ConnectGen

- Poor public policy
- Ordinance may have an adverse impact on the state's ability to address climate change, fight wildfires and reduce carbon emissions, all of which could result in significant adverse impacts on the environment

Cox, Castle & Nicholson/ ConnectGen

- County must prepare an environmental analysis in compliance with CEQA before approving the ordinance
- Inconsistent with the General Plan
- County has the discretion to allow or disallow large wind energy projects

California Wind Energy Assoc.

- County must prepare an environmental analysis in compliance with CEQA before approving the ordinance
- Realizing the state's clean energy goals will require counties to recognize that wind energy projects must be a part of the solution to the most pressing environmental problem of our time

California Wind Energy Assoc.

- County planning staff have previously found that two properly designed large wind projects are compatible with high fire risk lands
- Hatchet Ridge Wind Project has safely operated for more than 10 years
- Wind energy projects bring important economic benefits to local communities

Jim Wiegand

- Supports the proposed prohibition because turbines catch fire on a regular basis
- Wind turbines result in much greater bald eagle mortality than is reported
- Wind energy's contribution to the electrical grid are overstated
- County's approval of the Hatchet Ridge Wind Project was a monumental mistake