

From Carol Black, Citizen of Whitman County

April 28, 2025

Whitman County Commissioners
Whitman County Planning Commission
Whitman County Planner

Dear Commissioners, Planning Commission members, and County Planner:

I have significant concerns about several county-referenced documents posted on the Planning Department website. Some have been touted as important to the decision-making by county officials. Certain documents should be removed since they are inappropriate, outdated, or a process study. Below, I describe concerns and findings and point out documents that should be reviewed and addressed.

Three articles by **American Clean Power** (ACP) that are posted to the website are inappropriate and should be removed. They are documents written by industry advocacy and are not peer-reviewed. It is very important to note that **American Clean Power** is a tax-exempt nonprofit with the goal of "Community Improvement, Capacity Building, and Promotion of Business," thus, advocacy. Their 2023 Form 990 reported that 10.5% of the revenue pays the salaries of their administrative team (source: ProPublica nonprofit explorer).

- CEO Jason Grumet - \$1,213,594
- Strategy Officer - \$1,119,388
- Chief Advocacy - \$1,043,69

The following three documents are outdated. As I noted in my earlier correspondence with you, the turbines being considered for Harvest Hills and other new installations will be much taller and create specific issues that older publications do not address. Referencing data from studies conducted on much older and shorter turbines is not comparable to the newest, taller ones.

- 2011 – 14 years out of date – **Canada Wind Turbine Noise Study** - not peer reviewed and the most important variable that characterizes the wind turbines referenced in the study was not given.
- 2009 – 26 years out of date. No reference to wind turbine heights that correspond to the data collected. Note: the data shows impacts on residences within one-mile. - **Ernest Orlando Lawrence BNL - Impact of Wind Power Projects on Residential Property Values.**
- 2009 – 26 years out of date. No reference to wind turbine heights that correspond to the data collected. **Mark Bastasch CH2M Hill - Memorandum on Noise 2009-09-10.** Note: the conclusion notes the misuse of the term infrasound when sound annoyances are from the "swish," which they note needs "to be focused on in order to reduce it and obtain a proper estimate of its effects. It will then be the responsibility of legislators to fix the criterion levels, However, although the needs of sensitive persons may influence decisions, limits are not normally set to satisfy the most sensitive."

This article is about "process" and does not report on impacts; thus it is not useful for review by interested parties. Its target audience is Humanities & Social Sciences Communications **Mihai Andrei - Wind Turbine Noise Studies 2025-03-12** – Science News. However, I give them full credit for characterizing the turbines that were affiliated with the study. Their findings:

- "we are uncertain whether we would observe no adverse effects if participants were exposed to noise longer, for example, several hours."

- “our goal was to investigate the direct impact of wind turbine noise **on the dynamics of mechanisms** controlling cognitive processes.”
- **This is a pilot study that evaluated a measurement process and not the overall effect.** 2MW wind turbine, young adults, 450 foot turbine/blade height, single experiment, very short-term exposure - not long-term exposure, 1 of 15 rated annoyance high (7%), note further research is needed to confirm and address duration.

Finally, this article supports my contention that the “precautionary principle” is needed to protect from the unknown and yet-to-be-determined effects of the newer, taller turbines. *JOEM Nov 2014 – literature review.* Again, it lacks references that characterize the wind turbines associated with the research. **Wind Turbines and Health - A Critical Review of the Scientific Literature (PDF.** Their final result:

- “Given the coarseness of measures used in many studies, the magnitude of these findings are likely attenuated and underestimate the effect of annoyance on QOL. Visual effect increases annoyance beyond sound exposure and noise sensitivity, but at present there is insufficient research to conclude that visual effect operates separately from noise sensitivity because the two variables are correlated.”

There is no reference date to the presentation, **Overview of Commercial Wind Ordinance.** The document notes that Whitman County started its wind ordinance in 2009 using Adams County as its template. It references a setback from non-participating occupied structures of **five times the height of the turbine, measured to the full extent of the rotor** (not the same as the current code). Additionally, it references two lawsuits filed based on:

- low frequency noise emissions from the turbines;
- setbacks from turbines to occupied structures; the measurement scale by which noise from turbines is determined;
- despoiling the views on the Palouse with turbines;
- insufficient protection in the code for birds and bats; and
- the lack of provisions for a technical advisory committee.

Lastly, listed below are two articles you may review and consider for posting to the County Planning Division website. I submitted these recently in my correspondence.

- **Science Direct.** February 2024 Volume 185. Commercial wind turbines and residential home values: New evidence from the universe of land-based wind projects in the United States. Eric J. Brunner, Ben Hoen, Joe Rand , David Schwegman
<https://www.sciencedirect.com/science/article/pii/S0301421523004226>
- **Proceeding of the National Academy of Sciences - PNAS.** March 18, 2024. The visual effect of wind turbines on property values is small and diminishing in space and time. Wei Guo, Leonie Wenz and Maximilian Auffhammer
<https://www.pnas.org/doi/10.1073/pnas.2309372121>

Respectfully,

Carol Black