

**DOCKETED**

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<b>Project Title:</b>	Fountain Wind Project
<b>TN #:</b>	263388
<b>Document Title:</b>	County of Shasta Letter Comments on Staff Assessment
<b>Description:</b>	County of Shasta Letter Comments on Staff Assessment
<b>Filer:</b>	Kari Cameron
<b>Organization:</b>	County of Shasta
<b>Submitter Role:</b>	Public Agency
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# Shasta County

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May 27, 2025

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**Re: Comments of the County of Shasta on the Staff Assessment, including the DEIR, for the Fountain Wind Project (TN# 262350)**

The County of Shasta ("County") is the local government with land use and related jurisdiction over the areas of the proposed Fountain Wind Energy Project (23-OPT-01) submitted to the California Energy Commission ("CEC") by Fountain Wind, LLC.

On March 25, 2025, the County received a Staff Assessment ("SA") from CEC staff which includes a Draft Environmental Impact Report ("DEIR") prepared by staff to evaluate the potential environmental effects of the construction and operation of the Fountain Wind Project ("Project") (23-OPT-01), in compliance with the California Environmental Quality Act ("CEQA"), the CEQA Guidelines, the Warren-Alquist State Energy Resources Conservation and Development Act, and California Code of Regulations, title 20, chapter 5, article 4.1 (Opt-In Certification Program) (TN# 262350). The SA also evaluates whether the construction and operation of the Project would conform with all applicable local, state, and federal laws, ordinances, regulations, and standards ("LORS").

Accordingly, the County hereby submits the following comments on the Staff Assessment, including the DEIR, for the Fountain Wind Project.

## **I. Standing Reservation of Rights**

The County's Comment Letter is filed pursuant to the County's Standing Reservation of Rights, filed with the CEC on September 28, 2023 (TN# 252439). This Standing Reservation of Rights details the County's standing objection to the jurisdiction of the CEC to proceed with the application process for the Fountain Wind Project. The County is participating in this proceeding to protect its rights and advocate for its constituents, while also being responsive to the CEC's

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request for review and comment with regard to the Project, but is not waiving or intending to waive the County's Standing Reservation of Rights.

## **II. County Comments On Staff Assessment**

### **A. Staff Assessment**

The County hereby submits the attached Comment Memos on the Staff Assessment:

1. Response to Fountain Wind Staff Assessment: Net Economic Impact Analysis – Stafford Nichols Research Manager, Beacon Economics
2. Memorandum Re Fountain Wind Project Staff Assessment Findings re Community Benefits Agreement(s) – Ryan Baron, Partner, Best Best & Krieger LLP
3. Evaluation of CEC's Staff Assessment for the Fountain Wind Energy Project – Project Alternatives and Public Convenience and Necessity – Gary S. Seleba, Strategic Energy Experts.

### **B. Draft Environmental Impact Report**

The County hereby submits the attached Comment Memos on the DEIR:

4. Evaluation of CEC's Staff Assessment for the Fountain Wind Energy Project – Visual Impacts - Bruce Grove, Regional Principal, SHN Engineers & Geologists, Inc.
5. Evaluation of CEC's Staff Assessment for the Fountain Wind Energy Project – Air Quality Impacts, Gary Rees, Planning & Biology Service Area Principal, SHN Engineers & Geologists, Inc.
6. Evaluation of the California Energy Commission's Staff Assessment for the Fountain Wind Energy Project – Biological Resources – Donald Burk, Environmental Services Manager, ENPLAN: Environmental and Geospatial Technologies.
7. Evaluation of CEC's Staff Assessment for the Fountain Wind Energy Project – Water Resource Impacts - Adam Fieseler, Assistant Director Department of Resource Management, County of Shasta.
8. Evaluation of CEC's Staff Assessment for the Fountain Wind Energy Project – Wildland Fire Impacts - David Rich, PhD, Principal, Reax Engineering Inc. and Maria Theodori, M.S., PE Fire Protection Engineer, Reax Engineering Inc.

9. Evaluation of CEC's Staff Assessment for the Fountain Wind Energy Project – Tribal Cultural Resource Impacts - Ethan "Red Eagle" Lawton, Tribal Liaison, SHN Engineers & Geologists, Inc.

Should the Project proceed, the County looks forward to reviewing the Final EIR. Please let me know if you have any questions regarding the points above.

Sincerely,



Adam Fieseler  
Assistant Director  
Department of Resource Management  
County of Shasta