

**DOCKETED**

<b>Docket Number:</b>	23-OPT-01
<b>Project Title:</b>	Fountain Wind Project
<b>TN #:</b>	248742
<b>Document Title:</b>	Deficiency letter
<b>Description:</b>	Letter and accompanying attachments identifying information deficiencies in the Fountain Wind application
<b>Filer:</b>	Lon Payne
<b>Organization:</b>	California Energy Commission
<b>Submitter Role:</b>	Commission Staff
<b>Submission Date:</b>	2/10/2023 2:03:57 PM
<b>Docketed Date:</b>	2/10/2023



**CALIFORNIA  
ENERGY COMMISSION**



**CALIFORNIA  
NATURAL  
RESOURCES  
AGENCY**

February 10, 2023

Henry Woltag  
Fountain Wind LLC  
1001 McKinney, Suite 700  
Houston, TX 77002

### **Determination of Incomplete Application and Request for Information for the Fountain Wind Project (23-OPT-01)**

Dear Henry Woltag:

On January 11, 2023, Fountain Wind LLC (applicant), completed its filing of an Opt-In Application to construct and operate a wind energy generation facility on approximately 4,500 acres of private, leased land in unincorporated Shasta County, California. The property is approximately one mile west of the existing Hatchet Ridge Wind Project, six miles west of Burney, 35 miles northeast of Redding, immediately south of California State Route 299, near the private recreational facility of Moose Camp2, and other private inholdings. Overall, the project would have a nameplate generating capacity of up to 205 megawatts.

The applicant proposes to construct up to 48 turbines, each with a generating capacity of up to 7.2 megawatts. Associated infrastructure and facilities would include a 34.5-kilovolt overhead and underground electrical collector system to connect turbines together and to an on-site collector substation; overhead and underground fiber-optic communication lines; an on-site switching station to connect the project to the existing regional grid operated by the Pacific Gas & Electric Company; a temporary construction and equipment laydown area; nine temporary laydown areas distributed throughout the project site to temporarily store and stage materials and equipment; an operation and maintenance facility with employee parking; up to four permanent meteorological evaluation towers (MET); temporary, episodic deployment of mobile Sonic Detection and Ranging (SoDAR) or Light Detection and Ranging (LiDAR) systems within identified disturbance areas (MET locations); two storage sheds; and three temporary batch plants. Up to 19 miles of new access roads would be constructed within the project site, and up to 19 miles of existing roads would be improved. No new transmission lines are proposed.

California Energy Commission (CEC) staff has completed its initial review of the project application pursuant to Public Resources Code section 25545.4(a), which states, "within

30 days of the submission of the application, the commission shall review the application and make a determination of completeness.”

Based on this review, the CEC has determined that the submitted application is incomplete.

Staff has identified deficiencies in the following technical areas: Air Quality, Alternatives, Biological Resources, Cultural Resources, Geological Hazards, Hazardous Materials Management, Land Use, Public Health, Socioeconomics, Soils, Traffic and Transportation, Transmission Line Safety and Nuisance, Transmission System Engineering, Visual Resources, Waste Management, Water Resources, and Worker Safety and Fire Protection. CEC staff also identified deficiencies with the Project Overview and Mandatory Requirements associated with the Opt-in Program. (Cal. Code Regs., tit. 20, §§ 1877, 1879.)

Under Public Resources Code section 25545.4(b), CEC requests the information described in the attachments to this memorandum, which consist of: 1) completed data adequacy worksheets covering the informational requirements specified in statute and regulations, 2) requests for additional information needed for CEC staff to complete its environmental analysis of the proposed project, and 3) input received from partner agencies that have a Memorandum of Understanding with the CEC to perform related reviews for opt-in applications.

In addition to the information requirements specified in Appendix B, pursuant to Public Resources Code section 25545.4(b), the CEC is requesting additional information in the technical areas of Cultural and Tribal Cultural Resources, Geologic Hazards, Hazards and Hazardous Materials, Soils, Water Resources, and Wildfire. The comment letter from Central Valley Regional Water Quality Control Board, which is attached, also includes additional requests for information.

All the requested information is reasonably necessary to prepare the environmental impact report and to support a decision on the application, including making all the findings required in Chapter 6.2 of Division 15 of the Public Resources Code.

For each deficiency identified in the data adequacy worksheets, CEC staff requests the applicant submit an estimate of when it believes the information can be provided. We also request an estimate of when responses to the Data Requests can be provided.

Since the information requested may take time to assemble and transmit, the CEC understands that a series of partial responses may be provided. In the case of a partial response, please note in a cover letter accompanying the information what identified deficiency the response is intended to make complete and whether the applicant considers the filing to be the final filing necessary to address the remaining identified

deficiencies. The CEC will endeavor to review materials on a rolling basis as they are received.

Consistent with Public Resources Code section 25545.4(c)(2) and California Code of Regulations, title 20, section 1878, upon receipt of all information responsive to this request, *accompanied by a statement from the Applicant that its response to this request for information is now complete and addresses all identified deficiencies*, CEC technical staff will finalize review of the information provided and document its determination regarding application completeness in a subsequent letter.

If you have any questions about the information identified as necessary to complete the application, please email Leonidas Payne, project manager, at [leonidas.payne@energy.ca.gov](mailto:leonidas.payne@energy.ca.gov).

Cordially,



-  
Drew Bohan  
Executive Director

#### Attachments

Attachment A: CEC Staff's Data Adequacy Worksheets for Appendix B topic areas

Attachment B: CEC Data Requests on additional topics

Attachment C: Correspondence from MOU agencies (Waterboards, DTSC)

## Attachment A

CEC Staff's Data Adequacy Worksheets for Appendix B topic areas

Adequacy Issue: Adequate \_\_\_\_\_ Inadequate **X**

**DATA ADEQUACY WORKSHEET**

Revision No. \_\_\_\_\_ Date 1/27/2023

Technical Area: Project Overview

Project: Fountain Wind

Technical Staff: Ken Salyphone/Laiping Ng

Project Manager: Leonidas Payne

Docket: 23-OPT-01

Technical Senior: Steven Kerr

SITING REGULATIONS	INFORMATION	AFC PAGE NUMBER AND SECTION NUMBER	ADEQUATE YES OR NO	INFORMATION REQUIRED TO MAKE AFC CONFORM WITH REGULATIONS
Cal. Code Regs., tit. 20, § 1877; § 1704, (a) (3) (A)	Descriptions of all significant assumptions, methodologies, and computational methods used in arriving at conclusions in the document.	Source Documents/Sections identified in TN 248321: Appendix B Opt-in Application Crosswalk Matrix	No	Please see information requirement deficiencies noted in this column throughout Data Adequacy Worksheets.
Cal. Code Regs., tit. 20, § 1877; § 1704, (a) (3) (B)	Descriptions, including methodologies and findings, of all major studies or research efforts undertaken and relied upon to provide information for the document; and a description of ongoing research of significance to the project (including expected completion dates; and	Source Documents/Sections identified in TN 248321: Appendix B Opt-in Application Crosswalk Matrix	No	Please see information requirement deficiencies noted in this column throughout Data Adequacy Worksheets.
Cal. Code Regs., tit. 20, § 1877; § 1704, (a) (3) (C)	A list of all literature relied upon or referenced in the documents, along with brief discussions of the relevance of each such reference	Source Documents/Sections identified in TN 248321: Appendix B Opt-in Application Crosswalk Matrix	No	Please see information requirement deficiencies noted in this column throughout Data Adequacy Worksheets.
Cal. Code Regs., tit. 20, § 1877; § 1704, (a) (4)	Each principal subject area covered in a notice or application shall be set forth in a separate chapter or section, each of which shall identify the person or persons responsible for its preparation.	Source Documents/Sections identified in TN 248321: Appendix B Opt-in Application Crosswalk Matrix	Yes	
Appendix B (a) (1) (A)	A general description of the proposed site and related facilities, including the location of the site or transmission routes, the type, size and capacity of the generating or transmission facilities, fuel characteristics, fuel supply routes and facilities, water supply routes and facilities, pollution control systems, and other general characteristics.	TN 248322: Executive Summary and Project Description  TN 248288-2: DEIR Description of Project and Alternatives	Yes	

Adequacy Issue: Adequate \_\_\_\_\_ Inadequate **X**

**DATA ADEQUACY WORKSHEET**

Revision No. \_\_\_\_\_ Date 1/27/2023

Technical Area: Project Overview

Project: Fountain Wind

Technical Staff: Ken Salyphone/Laiping Ng

Project Manager: Leonidas Payne

Docket: 23-OPT-01

Technical Senior: Steven Kerr

SITING REGULATIONS	INFORMATION	AFC PAGE NUMBER AND SECTION NUMBER	ADEQUATE YES OR NO	INFORMATION REQUIRED TO MAKE AFC CONFORM WITH REGULATIONS
Appendix B (a) (1) (B)	Identification of the location of the proposed site and related facilities by section, township, range, county and assessor's parcel numbers.	TN 248322: Executive Summary and Project Description  TN 248288-2: DEIR Description of Project and Alternatives  TN 248331: Lease with Oxbow Holdings	Yes	
Appendix B (a) (1) (C)	A description of and maps depicting the region, the vicinity, and the site and its immediate surroundings.	TN 248322: Executive Summary and Project Description  TN 248329-6: LSAA Figure 1 Project Overview  TN 248288-2: DEIR Description of Project and Alternatives	Yes	
Appendix B (a) (1) (D)	A full-page color photographic reproduction depicting the visual appearance of the site prior to construction, and a full-page color simulation or artist's rendering of the site and all project components at the site, after construction.	TN 248288-2: DEIR Description of Project and Alternatives Figure 2-1 – 2-5	No	TN 248322: Executive Summary and Project Description lacks a full-page color photographic reproduction depicting the visual appearance of the site prior to construction, and a full-page color simulation or artist's rendering of the site and all project components at the site, after construction, for the project as currently proposed.
Appendix B (a) (1) (E)	In an appendix to the application, a list of current assessor's parcel numbers and owners' names and addresses for all parcels within 500 feet of the proposed transmission line and other linear facilities, and within 1000 feet of the proposed powerplant and related facilities.	TN 248296-9: Parcel Owners List  248296-10: Figure - Parcels within 1000 ft	Yes	
Appendix B (a) (2)	Project Schedule: Proposed dates of initiation and completion of construction, initial start-up, and full-scale operation of the proposed facilities.	TN 248288-2: DEIR Description of Project and Alternatives Section 2.4.5.5: Construction Schedule and Workforce	Yes	

Adequacy Issue: Adequate \_\_\_\_\_ Inadequate **X**

**DATA ADEQUACY WORKSHEET**

Revision No. \_\_\_\_\_ Date 1/27/2023

Technical Area: Project Overview

Project: Fountain Wind

Technical Staff: Ken Salyphone/Laiping Ng

Project Manager: Leonidas Payne

Docket: 23-OPT-01

Technical Senior: Steven Kerr

SITING REGULATIONS	INFORMATION	AFC PAGE NUMBER AND SECTION NUMBER	ADEQUATE YES OR NO	INFORMATION REQUIRED TO MAKE AFC CONFORM WITH REGULATIONS
Appendix B (a) (3) (A)	A list of all owners and operators of the site(s), the power plant facilities, and, if applicable, thermal host, the geothermal leasehold, the geothermal resource conveyance lines, and the geothermal re-injection system, and a description of their legal interest in these facilities.	TN 248331: Lease with Oxbow Holdings TN 248322: Executive Summary and Project Description	Yes	
Appendix B (a) (3) (B)	A list of all owners and operators of the proposed electric transmission facilities.	TN 248322: Executive Summary and Project Description, pg. 7	Yes	
Appendix B (a) (3) (C)	A description of the legal relationship between the applicant and each of the persons or entities specified in subsections (a)(3)(A) and (B).	TN 248331: Lease with Oxbow Holdings	No	The legal relationship between the project owner and owner and operator of the proposed electric transmission facilities is not described. Please provide this description
Appendix B (b) (1)	In a section entitled, "Generation Facility Description, Design, and Operation" provide the following information:	-----	-----	-----
Appendix B (b) (1) (A)	Maps at a scale of 1:24,000 (1" = 2000'), (or appropriate map scale agreed to by staff) along with an identification of the dedicated leaseholds by section, township, range, county, and county assessor's parcel number, showing the proposed final locations and layout of the power plant and all related facilities;	TN 248288-2: <a href="#">DEIR Description of Project and Alternatives</a> , Figure 2-1 Project Location	No	Not to the scale of 1:24,000
Appendix B (b) (1) (B)	Scale plan and elevation drawings depicting the relative size and location of the power plant and all related facilities to establish the accuracy of the photo simulations required in Sections (a)(1)(D) and (g)(6)(F);	TN 248288-2: <a href="#">DEIR Description of Project and Alternatives</a> , Figure 3-4a	No	No site elevation drawing was provided.
Appendix B (b) (1) (C)	A detailed description of the design, construction and operation of the facilities, specifically including the power generation, cooling, water supply and treatment, waste handling and control, pollution control, fuel handling, and safety, emergency and auxiliary systems, and fuel types and fuel use scenarios; and	TN 248288-2: DEIR Description of Project and Alternatives Section 2.4: Description of the Project	Yes	



Adequacy Issue: Adequate \_\_\_\_\_ Inadequate **X**

**DATA ADEQUACY WORKSHEET**

Revision No. \_\_\_\_\_ Date 1/27/2023

Technical Area: Project Overview

Project: Fountain Wind

Technical Staff: Ken Salyphone/Laiping Ng

Project Manager: Leonidas Payne

Docket: 23-OPT-01

Technical Senior: Steven Kerr

SITING REGULATIONS	INFORMATION	AFC PAGE NUMBER AND SECTION NUMBER	ADEQUATE YES OR NO	INFORMATION REQUIRED TO MAKE AFC CONFORM WITH REGULATIONS
Appendix B (b) (1) (D)	A description of how the site and related facilities were selected and the consideration given to engineering constraints, site geology, environmental impacts, water, waste and fuel constraints, electric transmission constraints, and any other factors considered by the applicant.	TN 248288-2: DEIR Description of Project and Alternatives Section 2.3: Project Objectives thru Section 2.4.8.3 Hazardous Materials	Yes	
Appendix B (b) (2)	In a section entitled, "Transmission Lines Description, Design, and Operation" provide the following information:	-----	-----	-----
Appendix B (b) (2) (A)	Maps at a scale of 1:24,000 (or appropriate map scale agreed to by staff) of each proposed transmission line route, showing the settled areas, parks, recreational areas, scenic areas, and existing transmission lines within one mile of the proposed route(s);	TN 248297-2: <a href="#">CEQA Initial Study</a> Figure 2	No	Not to the scale of 1:24,000 and no settled areas, parks, recreational areas, scenic areas are shown.
Appendix B (b) (2) (B)	A full-page color photographic reproduction depicting a representative above ground section of the transmission line route prior to construction and a full-page color photographic simulation of that section of the transmission line route after construction.		No	The project proposes a short extension of the existing 230 kV transmission lines that will be routed to the switching station. The project also proposes 34.5 kV overhead lines.  A full-page color photographic reproduction depicting a representative above ground section of the transmission line route prior to construction and a full-page color photographic simulation of that section of the transmission line route after construction need to be provided.

Adequacy Issue: Adequate \_\_\_\_\_ Inadequate **X**

**DATA ADEQUACY WORKSHEET**

Revision No. \_\_\_\_\_ Date 1/27/2023

Technical Area: Project Overview

Project: Fountain Wind

Technical Staff: Ken Salyphone/Laiping Ng

Project Manager: Leonidas Payne

Docket: 23-OPT-01

Technical Senior: Steven Kerr

SITING REGULATIONS	INFORMATION	AFC PAGE NUMBER AND SECTION NUMBER	ADEQUATE YES OR NO	INFORMATION REQUIRED TO MAKE AFC CONFORM WITH REGULATIONS
Appendix B (b) (2) (C)	A detailed description of the design, construction, and operation of any electric transmission facilities, such as power lines, substations, switchyards, or other transmission equipment, which will be constructed or modified to transmit electrical power from the proposed power plant to the load centers to be served by the facility. Such description shall include the width of rights-of-way and the physical and electrical characteristics of electrical transmission facilities such as towers, conductors, and insulators.	TN 248288-2: DEIR Description of Project and Alternatives Section 2.4.1: Wind Generators thru Section 2.4.6: Operation and Maintenance	Yes	
Appendix B (b) (2) (D)	A description of how the route and additional transmission facilities were selected, and the consideration given to engineering constraints, environmental impacts, resource conveyance constraints, and electric transmission constraints; and	TN 248288-2: DEIR Description of Project and Alternatives Section 2.3: Project Objectives	Yes	
Appendix B (e) (1)	A discussion of how facility closure will be accomplished in the event of premature or unexpected cessation of operations.	TN 248322: Executive Summary and Project Description 4.4.6 Decommissioning and Site Restoration  TN 248288-2: DEIR Description of Project and Alternatives Section 2.4.7: Decommissioning and Site Restoration	Yes	

Adequacy Issue: Adequate \_\_\_\_\_ Inadequate **X**  
 Technical Area: **Mandatory Opt-in Requirements**

**DATA ADEQUACY WORKSHEET**

Revision No. \_\_\_\_\_ Date February 9, 2023

Project: Fountain Wind

Technical Staff: Negar Vahidi, Eileen Allen,  
Tatiana Inouye, Irene  
Kaufman

Project Manager: Leonidas Payne

Docket: 23-OPT-01

Technical Senior: Steven Kerr, Joseph  
Hughes

OPT-IN STATUTES/ REGULATIONS	INFORMATION	OPT-IN PAGE NUMBER AND SECTION NUMBER	ADEQUATE YES OR NO	INFORMATION REQUIRED TO MAKE OPT-IN CONFORM WITH REGULATIONS
<b>"FACILITY" OR "DISCRETIONARY PROJECT" DEFINITION MET</b>				
Cal. Code Regs., tit. 20, § 1877(b); Pub. Resources Code, 25545(§ 25545(b)	Explanation of how the facility meets one or more of the definitions of "facility":	TN 248322: Pg. # I Section 1.1 of Executive Summary and Project Description  TN 248321: Crosswalk Matrix pg. 43 (b)	Yes	
Pub. Resources Code, § 25545(b)(1)	A solar photovoltaic or terrestrial wind electrical generating powerplant with generating capacity of 50MW or more and any facilities appurtenant thereto.	TN 248322: Pg. # I Section 1.1 of Executive Summary and Project Description  TN 248321: Crosswalk Matrix pg. 43 (b)	Yes	
Pub. Resources Code, § 25545(b)(2)	An energy storage system as defined in Section 2835 of the Pub. Util. Code that can store 200 MWh or more of electrical energy.	N/A	N/A	
Pub. Resources Code, § 25545(b)(3)	A stationary electrical generating powerplant using any source of thermal energy, with a generating capacity of 50 MW or more, excluding any powerplant that burns, uses, or relies on fossil or nuclear fuels.	N/A	N/A	

Adequacy Issue: Adequate \_\_\_\_\_ Inadequate **X**  
 Technical Area: **Mandatory Opt-in Requirements**

**DATA ADEQUACY WORKSHEET**

Revision No. \_\_\_\_\_ Date February 9, 2023

Project: Fountain Wind

Technical Staff: Negar Vahidi, Eileen Allen,  
Tatiana Inouye, Irene Kaufman

Project Manager: Leonidas Payne

Docket: 23-OPT-01

Technical Senior: Steven Kerr, Joseph Hughes

OPT-IN STATUTES/ REGULATIONS	INFORMATION	OPT-IN PAGE NUMBER AND SECTION NUMBER	ADEQUATE YES OR NO	INFORMATION REQUIRED TO MAKE OPT-IN CONFORM WITH REGULATIONS
Pub. Resources Code, § 25545(b)(4); Cal. Code Regs., tit. 20, § 1877(b)	A discretionary project that applicant has certified that a capital investment of at least \$250,000,000 will be made over a period of 5 years. Provide what the facility would manufacture, produce, or assemble, and how the facility's products or services would be used in the manufacture, production, or assembly of the following: <ul style="list-style-type: none"> <li>a. Energy storage systems or component manufacturing,</li> <li>b. Wind systems or component manufacturing,</li> <li>c. Solar photovoltaic energy systems or component manufacturing, or</li> <li>d. Specialized products, components, or systems that are integral to renewable energy or energy storage technologies.</li> </ul>	N/A	N/A	
Pub. Resources Code, § 25545(b)(5)	An electric transmission line carrying electric power from a facility described in paragraph (b)(1), (2), or (3) that is located in the state to a point of junction with any interconnected electrical transmission system.	N/A	N/A	
<b>REQUIREMENTS FOR COVERED PROJECT UNDER THE LABOR CODE</b>				
Cal. Code Regs., tit. 20, § 1877(c)	Certifications required by Public Resources Code sections 25545.3.3 and 25545.3.5.	TN 248291-2: AB 205 Labor Certification  TN 248321: Crosswalk Matrix pg. 44 (h)	Yes	

Adequacy Issue: Adequate \_\_\_\_\_ Inadequate **X**  
 Technical Area: **Mandatory Opt-in Requirements**

**DATA ADEQUACY WORKSHEET**

Revision No. \_\_\_\_\_ Date February 9, 2023

Project: Fountain Wind

Technical Staff: Negar Vahidi, Eileen Allen,  
Tatiana Inouye, Irene  
Kaufman

Project Manager: Leonidas Payne

Docket: 23-OPT-01

Technical Senior: Steven Kerr, Joseph  
Hughes

OPT-IN STATUTES/ REGULATIONS	INFORMATION	OPT-IN PAGE NUMBER AND SECTION NUMBER	ADEQUATE YES OR NO	INFORMATION REQUIRED TO MAKE OPT-IN CONFORM WITH REGULATIONS
Pub. Resources Code, § 25545.3.3	Certification that the applicant will meet the requirements of a covered project and the commission shall make the requirements a condition of certification. Include the applicant's certification that either of the following is true:	TN 248322: Pg. # I Section 1.1 of Executive Summary and Project Description  TN 248291-2: AB 205 Labor Certification  TN 248321: Crosswalk Matrix pg. 44 (h)	Yes	
Pub. Resources Code, § 25545.3.3(a)	The entirety of the construction of the covered project is a public work.	N/A	N/A	
Pub. Resources Code, § 25545.3.3(b)	The construction of the covered project is not in its entirety a public work for which prevailing wages must be paid, but all construction workers employed on the project will be paid at least the general prevailing rate of per diem wages for the type of work and geographic area, pursuant the Labor Code sections 1773 and 1773.9, except that apprentices registered in programs approved by the Chief of the Division of Apprenticeship Standards may be paid at least the applicable apprentice prevailing rate. For portions of the project that are not a public work, all of the following apply:	N/A	N/A	
Pub. Resources Code, § 25545.3.3(b)(1)	Applicant ensures that the prevailing wage requirement is included in all contracts for the performance of all construction work.	TN 248321: Crosswalk Matrix pg. 44 (h)	Yes	

Adequacy Issue: Adequate \_\_\_\_\_ Inadequate **X**  
 Technical Area: **Mandatory Opt-in Requirements**

**DATA ADEQUACY WORKSHEET**

Revision No. \_\_\_\_\_ Date February 9, 2023

Project: Fountain Wind

Technical Staff: Negar Vahidi, Eileen Allen,  
Tatiana Inouye, Irene Kaufman

Project Manager: Leonidas Payne

Docket: 23-OPT-01

Technical Senior: Steven Kerr, Joseph Hughes

OPT-IN STATUTES/ REGULATIONS	INFORMATION	OPT-IN PAGE NUMBER AND SECTION NUMBER	ADEQUATE YES OR NO	INFORMATION REQUIRED TO MAKE OPT-IN CONFORM WITH REGULATIONS
Pub. Resources Code, § 25545.3.3(b)(2)	Contractors and subcontractors must pay all construction workers employed in the construction of the project at least the general prevailing rate of per diem wages, except that apprentices registered in programs approved by the Chief of the Division of Apprenticeship Standards may be paid at least the applicable apprentice prevailing rate.	TN 248291-2: AB 205 Labor Certification  TN 248321: Crosswalk Matrix pg. 44 (h)	Yes	
Pub. Resources Code, § 25545.3.3(b)(3)	Contractors and subcontractors performing construction work on the project shall employ apprentices at no less than the ratio required in the Labor Code section 1777.5.	TN 248291-2: AB 205 Labor Certification	Yes	
Pub. Resources Code, § 25545.3.3(b)(4)	Except as provided in (b)(6), all contractors and subcontractors performing construction work shall maintain and verify payroll records pursuant the Labor Code section 1776, make those records available for inspection and copying, and furnish those payroll records to the Labor Commissioner pursuant to the Labor Code section 1771.4.	TN 248291-2: AB 205 Labor Certification	Yes	
Pub. Resources Code, § 25545.3.3(b)(5)	Except as provided in (b)(6), the pay prevailing wage provisions listed within this section may be enforced by the Labor Commissioner through the issuance of a civil wage and penalty assessment pursuant to the Labor Code sections 1741, 1742, 1771.2, and 1742.1.	TN 248291-2: AB 205 Labor Certification	Yes	

Adequacy Issue: Adequate \_\_\_\_\_ Inadequate **X**  
 Technical Area: **Mandatory Opt-in Requirements**

**DATA ADEQUACY WORKSHEET**

Revision No. \_\_\_\_\_ Date February 9, 2023

Project: Fountain Wind

Technical Staff: Negar Vahidi, Eileen Allen,  
Tatiana Inouye, Irene  
Kaufman

Project Manager: Leonidas Payne

Docket: 23-OPT-01

Technical Senior: Steven Kerr, Joseph  
Hughes

OPT-IN STATUTES/ REGULATIONS	INFORMATION	OPT-IN PAGE NUMBER AND SECTION NUMBER	ADEQUATE YES OR NO	INFORMATION REQUIRED TO MAKE OPT-IN CONFORM WITH REGULATIONS
Pub. Resources Code, § 25545.3.3(b)(6)	Paragraphs (b)(4) and (b)(5) do not apply if all contractors and subcontractors performing construction work on the project are subject to a project labor agreement. The project labor agreement shall include, but not be limited to, the following:	TN 248291-2: AB 205 Labor Certification	Yes	
Pub. Resources Code, § 25545.3.3(b)(6)(A)	Provisions requiring payment of prevailing wages to all construction workers employed in the construction of the project and for enforcement of that obligation through an arbitration procedure.	TN 248291-2: AB 205 Labor Certification	Yes	
Pub. Resources Code, § 25545.3.3(b)(6)(B)	Targeted hiring provisions, including a targeted hiring plan, on a craft-by-craft basis to address job access for local, disadvantaged, or underrepresented workers, as defined by a relevant local agency.	TN 248291-2: AB 205 Labor Certification	Yes	
Pub. Resources Code, § 25545.3.3(b)(6)(C)	Apprenticeship utilization provisions that commit all parties to increasing the share of work performed by state-registered apprentices above the state-mandated minimum ratio required in the Labor Code section 1777.5.	TN 248291-2: AB 205 Labor Certification	Yes	
Pub. Resources Code, § 25545.3.3(b)(6)(D)	Apprenticeship utilization provisions that commit all parties to hiring and retaining a certain percentage of state-registered apprentices that have completed the Multi-Craft Core pre-apprenticeship training curriculum referenced in the Unemployment Insurance Code section 14005(t).	TN 248291-2: AB 205 Labor Certification	Yes	

Adequacy Issue: Adequate \_\_\_\_\_ Inadequate **X**  
 Technical Area: **Mandatory Opt-in Requirements**

**DATA ADEQUACY WORKSHEET**

Project: Fountain Wind

Revision No. \_\_\_\_\_ Date February 9, 2023

Technical Staff: Negar Vahidi, Eileen Allen,  
Tatiana Inouye, Irene  
Kaufman

Project Manager: Leonidas Payne

Docket: 23-OPT-01

Technical Senior: Steven Kerr, Joseph  
Hughes

OPT-IN STATUTES/ REGULATIONS	INFORMATION	OPT-IN PAGE NUMBER AND SECTION NUMBER	ADEQUATE YES OR NO	INFORMATION REQUIRED TO MAKE OPT-IN CONFORM WITH REGULATIONS
Pub. Resources Code, § 25545.3.5	Certify that a skilled and trained workforce will be used to perform all construction work on the project and all of the following apply:	TN 248291-2: AB 205 Labor Certification	Yes	
Pub. Resources Code, § 25545.3.5(a)	Require in all contracts for the performance of work that every contractor and subcontractor at every tier will individually use a skilled and trained workforce to construct the project.	TN 248291-2: AB 205 Labor Certification	Yes	
Pub. Resources Code, § 25545.3.5(b)	Every contractor and subcontractor must use a skilled and trained workforce to construct the project.	TN 248291-2: AB 205 Labor Certification	Yes	
Pub. Resources Code, § 25545.3.5(c)	Except as provided in (e), contractors and subcontractors that fail to use a skilled and trained workforce shall be subject to the penalties provided in the Public Contract Code section 2603.	TN 248291-2: AB 205 Labor Certification	Yes	
Pub. Resources Code, § 25545.3.5(d)	Except as provided in (e), the applicant must retain records, including copies of monthly reports, that demonstrate compliance with the Public Contract Code section 2600 while the project or contract is being performed and for three years after completion of the project or contract. The applicant must submit these records immediately upon request of the commission. When submitted to the commission, these records shall be a public record under the California Public Records Act and shall be open to public inspection.	TN 248291-2: AB 205 Labor Certification	Yes	



Adequacy Issue: Adequate \_\_\_\_\_ Inadequate **X**  
 Technical Area: **Mandatory Opt-in Requirements**

**DATA ADEQUACY WORKSHEET**

Revision No. \_\_\_\_\_ Date February 9, 2023

Project: Fountain Wind

Technical Staff: Negar Vahidi, Eileen Allen,  
Tatiana Inouye, Irene Kaufman

Project Manager: Leonidas Payne

Docket: 23-OPT-01

Technical Senior: Steven Kerr, Joseph Hughes

OPT-IN STATUTES/ REGULATIONS	INFORMATION	OPT-IN PAGE NUMBER AND SECTION NUMBER	ADEQUATE YES OR NO	INFORMATION REQUIRED TO MAKE OPT-IN CONFORM WITH REGULATIONS
Pub. Resources Code, § 25545.3.5(e)	(c) and (d) do not apply if all contractors and subcontractors performing work on the project are subject to a project labor agreement. The project labor agreement shall also include, but not be limited to, all of the following:	TN 248291-2: AB 205 Labor Certification  TN 248321: Crosswalk Matrix pg. 44 (h)	Yes	
Pub. Resources Code, § 25545.3.5(e)(1)	Provisions requiring compliance with the skilled and trained workforce requirement and for enforcement of that obligation through an arbitration procedure.	TN 248291-2: AB 205 Labor Certification	Yes	
Pub. Resources Code, § 25545.3.5(e)(2)	Targeted hiring provisions, including a targeted hiring plan, on a craft-by-craft basis to address job access for local, disadvantaged, or underrepresented workers, as defined by a local agency.	TN 248291-2: AB 205 Labor Certification	Yes	
Pub. Resources Code, § 25545.3.5(e)(3)	Apprenticeship utilization provisions that commit all parties to increasing the share of work performed by state-registered apprentices above the state-mandated minimum ratio required in the Labor Code section 1777.5.	TN 248291-2: AB 205 Labor Certification	Yes	
Pub. Resources Code, § 25545.3.5(e)(4)	Apprenticeship utilization provisions that commit all parties to hiring and retaining a certain percentage of state-registered apprentices that have completed the Multi-Craft Core pre-apprenticeship training curriculum referenced in the Unemployment Insurance Code section 14005(t).	TN 248291-2: AB 205 Labor Certification	Yes	
<b>PERMIT APPLICATIONS SUBMITTED (LOCAL, STATE, AND FEDERAL)</b>				

Adequacy Issue: Adequate \_\_\_\_\_ Inadequate **X**  
 Technical Area: **Mandatory Opt-in Requirements**

**DATA ADEQUACY WORKSHEET**

Revision No. \_\_\_\_\_ Date February 9, 2023

Project: Fountain Wind

Technical Staff: Negar Vahidi, Eileen Allen,  
Tatiana Inouye, Irene Kaufman

Project Manager: Leonidas Payne

Docket: 23-OPT-01

Technical Senior: Steven Kerr, Joseph Hughes

OPT-IN STATUTES/ REGULATIONS	INFORMATION	OPT-IN PAGE NUMBER AND SECTION NUMBER	ADEQUATE YES OR NO	INFORMATION REQUIRED TO MAKE OPT-IN CONFORM WITH REGULATIONS
Cal. Code Regs., tit. 2, § 1877(d)	A discussion of whether the applicant has submitted any local, state, or federal permit applications. For any required permit that has not yet been submitted to the relevant state agency, include a plan for submitting the application and any discussions that have occurred with the state agency with authority over the project.	TN 248322: Executive Summary and Project Description; Section 5 (Project Permits), Table 3 (List of Potential Permits and Status), pgs. 16 to 17	No	<p><b>Permit Schedule.</b> The "List of Potential Permits and Status" provided in Table 3 does not identify the steps involved or the schedule for obtaining the permits that are outside the authority of the commission.</p> <p><b>Please provide the following:</b></p> <p>1. Provide the schedule for obtaining permits.</p>
<b>IDENTIFICATION OF WHETHER SITE IS LOCATED AT A PROHIBITED AREA</b>				
Cal. Code Regs., tit. 2, § 1877(e)	Identify whether the project is, on a prohibited site as identified in Public Resources Code section 25527 or on a site designated by the California Coastal Commission under Public Resources Code section 30413(b) or on a site designated by the San Francisco Bay Conservation and Development Commission under Government Code section 66645(b). Include documentation of the approval of the public agency having ownership or control of the land.	TN 248321: Crosswalk Matrix pg. 43 (e)	Yes	

Adequacy Issue: Adequate \_\_\_\_\_ Inadequate **X**  
 Technical Area: **Mandatory Opt-in Requirements**

**DATA ADEQUACY WORKSHEET**

Revision No. \_\_\_\_\_ Date February 9, 2023

Project: Fountain Wind

Technical Staff: Negar Vahidi, Eileen Allen,  
Tatiana Inouye, Irene Kaufman

Project Manager: Leonidas Payne

Docket: 23-OPT-01

Technical Senior: Steven Kerr, Joseph Hughes

OPT-IN STATUTES/ REGULATIONS	INFORMATION	OPT-IN PAGE NUMBER AND SECTION NUMBER	ADEQUATE YES OR NO	INFORMATION REQUIRED TO MAKE OPT-IN CONFORM WITH REGULATIONS
Pub. Resources Code, § 25527	<p>The following areas of the state shall not be approved as a site for a facility, unless the commission finds that such use is not inconsistent with the primary uses of such lands and that there will be no substantial adverse environmental effects and the approval of any public agency having ownership or control of such lands is obtained:</p> <ol style="list-style-type: none"> <li>1. State, regional, county and city parks; wilderness, scenic or natural reserves; areas for wildlife protection, recreation, historic preservation; or natural preservation areas in existence on the effective date of this division.</li> <li>2. Estuaries in an essentially natural and undeveloped state.</li> </ol> <p>In considering applications for certification, the commission shall give the greatest consideration to the need for protecting areas of critical environmental concern, including, but not limited to, unique and irreplaceable scientific, scenic, and educational wildlife habitats; unique historical, archaeological, and cultural sites; lands of hazardous concern; and areas under consideration by the state or the United States for wilderness, or wildlife and game reserves.</p>	TN 248321: Crosswalk Matrix pg. 43 (e)	Yes	
<b>NET POSITIVE ECONOMIC BENEFIT TO THE LOCAL GOVERNMENT</b>				

Adequacy Issue: Adequate \_\_\_\_\_ Inadequate **X**  
 Technical Area: **Mandatory Opt-in Requirements**

**DATA ADEQUACY WORKSHEET**

Revision No. \_\_\_\_\_ Date February 9, 2023

Project: Fountain Wind

Technical Staff: Negar Vahidi, Eileen Allen,  
Tatiana Inouye, Irene  
Kaufman

Project Manager: Leonidas Payne

Docket: 23-OPT-01

Technical Senior: Steven Kerr, Joseph  
Hughes

OPT-IN STATUTES/ REGULATIONS	INFORMATION	OPT-IN PAGE NUMBER AND SECTION NUMBER	ADEQUATE YES OR NO	INFORMATION REQUIRED TO MAKE OPT-IN CONFORM WITH REGULATIONS
Cal. Code Regs., tit. 2, § 1877(f)	Identify preliminary information demonstrating overall net positive economic benefit to the local government that would have had permitting authority over the site and related facility, consistent with Public Resources Code section 25545.9. Staff must provide the submitted information to the local government for review and comment.	TN 248292-2: Economic and Public Revenue Impact Study; pg. 4  TN 248322: Pg. X and Xi Section: 1.3 & 1.3.1.1 of Executive Summary and Project Description  TN 248292-3: Local Economics Memo  TN 248321: Crosswalk Matrix pg. 43 (e)	No	See item <i>Cal. Code Regs., tit. 20 § 1879(a)(7); Pub. Resources Code § 25545.9</i> , below.

Adequacy Issue: Adequate \_\_\_\_\_ Inadequate **X**  
 Technical Area: **Mandatory Opt-in Requirements**

**DATA ADEQUACY WORKSHEET**

Project: Fountain Wind

Revision No. \_\_\_\_\_ Date February 9, 2023

Technical Staff: Negar Vahidi, Eileen Allen,  
Tatiana Inouye, Irene  
Kaufman

Project Manager: Leonidas Payne

Docket: 23-OPT-01

Technical Senior: Steven Kerr, Joseph  
Hughes

OPT-IN STATUTES/ REGULATIONS	INFORMATION	OPT-IN PAGE NUMBER AND SECTION NUMBER	ADEQUATE YES OR NO	INFORMATION REQUIRED TO MAKE OPT-IN CONFORM WITH REGULATIONS
Cal. Code Regs., tit. 20 § 1879(a)(7); Pub. Resources Code § 25545.9	... economic benefits may include, but are not limited to the following: (a) Employment growth. (b) Housing development. (c) Infrastructure and environmental improvements. (d) Assistance to public schools and education. (e) Assistance to public safety agencies and departments. (f) Property taxes and sales and use tax revenues.	TN 248292-2: Economic and Public Revenue Impact Study; pg. 4  TN 248322: Pg. X and Xi Section: 1.3 & 1.3.1.1 of Executive Summary and Project Description  TN 248292-3: Local Economics Memo	No	<p><b><u>Economic Characteristics.</u></b> Page 4 of the            Economic and Public Revenue Impact Study            (TN# 248292-2) states,</p> <p><i>60M in property tax revenue is estimated to be            generated over the lifetime of the Project,            accruing to Shasta County, Cities, Special            Districts, Redevelopment Property Tax Agencies,            the Educational Revenue Augmentation Fund,            and Schools. Under current tax allocation            factors, of this total, about \$7.5 million would            accrue to the County, \$4 million to Cities, \$3.6M            to Special Districts, \$8M to Redevelopment            Property Tax, \$9M to the Educational Revenue            Augmentation Fund, and \$28 million to Schools.</i></p> <p>However, there are no further details provided in            this study on the economic base, fiscal            resources, and the applicable local agencies with            taxing powers and their most recent and            projected revenues.</p> <p><b>Please provide the following:</b></p> <p>1. Provide a discussion of economic base, fiscal            resources. Please provide a list of the applicable            local agencies with taxing powers and their most            recent and projected revenues.</p>

**LEGALLY BINDING ENFORCEABLE AGREEMENT(S) FOR COMMUNITY BENEFITS OF THE PROJECT**

Adequacy Issue: Adequate \_\_\_\_\_ Inadequate **X**  
 Technical Area: **Mandatory Opt-in Requirements**

**DATA ADEQUACY WORKSHEET**

Revision No. \_\_\_\_\_ Date February 9, 2023

Project: Fountain Wind

Technical Staff: Negar Vahidi, Eileen Allen,  
Tatiana Inouye, Irene Kaufman

Project Manager: Leonidas Payne

Docket: 23-OPT-01

Technical Senior: Steven Kerr, Joseph Hughes

OPT-IN STATUTES/ REGULATIONS	INFORMATION	OPT-IN PAGE NUMBER AND SECTION NUMBER	ADEQUATE YES OR NO	INFORMATION REQUIRED TO MAKE OPT-IN CONFORM WITH REGULATIONS
Cal. Code Regs., tit. 2, § 1877(g)	Discussion of applicant's plan or strategy, including a timeline for execution, to obtain legally binding and enforceable agreement(s) with, or that benefit, a coalition of one or more community-based organizations.	TN 248296-2: Community Benefits Program  TN 248321: Crosswalk Matrix pg. 43 (g)	Yes	
Pub. Resources Code § 25545.10(a)	... such as workforce development and training organizations, labor unions, social justice advocates, local governmental entities, California Native American tribes, or other organizations that represent community interests, where there is mutual benefit to the parties to the agreement. The topics and specific terms in the community benefits agreements may vary and may include workforce development, job quality, and job access provisions that include, but are not limited to, any of the following:	TN 248296-2: Community Benefits Program  TN 248291-2: AB 205 Labor Certification	Yes	
Pub. Resources Code § 25545.10(a)(1)	Terms of employment, such as wages and benefits, employment status, workplace health and safety, scheduling, and career advancement opportunities.	TN 248296-2: Community Benefits Program  TN 248291-2: AB 205 Labor Certification	Yes	
Pub. Resources Code § 25545.10(a)(2)	Worker recruitment, screening, and hiring strategies and practices, targeted hiring planning and execution, investment in workforce training and education, and worker voice and representation in decision making affecting employment and training.	TN 248296-2: Community Benefits Program  TN 248291-2: AB 205 Labor Certification	Yes	

Adequacy Issue: Adequate \_\_\_\_\_ Inadequate **X**  
 Technical Area: **Mandatory Opt-in Requirements**

**DATA ADEQUACY WORKSHEET**

Project: Fountain Wind

Revision No. \_\_\_\_\_ Date February 9, 2023

Technical Staff: Negar Vahidi, Eileen Allen,  
Tatiana Inouye, Irene  
Kaufman

Project Manager: Leonidas Payne

Docket: 23-OPT-01

Technical Senior: Steven Kerr, Joseph  
Hughes

OPT-IN STATUTES/ REGULATIONS	INFORMATION	OPT-IN PAGE NUMBER AND SECTION NUMBER	ADEQUATE YES OR NO	INFORMATION REQUIRED TO MAKE OPT-IN CONFORM WITH REGULATIONS
Pub. Resources Code § 25545.10(a)(3)	Establishing a high road training partnership, as defined in the Unemployment Insurance Code section 14005.	TN 248296-2: Community Benefits Program  TN 248291-2: AB 205 Labor Certification	Yes	
Pub. Resources Code § 25545.10(b)	Funding for or providing specific community improvements or amenities such as park and playground equipment, urban greening, enhanced safety crossings, paving roads and bike paths, and annual contributions to a nonprofit or community-based organization that awards grants to organizations delivering community-based services and amenities.	TN 248296-2: Community Benefits Program, Pg. 17-18, SCT Wind Project Community Access Memorandum  TN 248322: Pgs. ix, x Section: 1.3 of Executive Summary and Project Description	No	The Shasta County Timberlands (SCT) Wind Project Community Access Memorandum indicates limited public access to members of the Moose Camp, Round Mountain, Montgomery Creek, and Burney communities for specific recreational or culturally important activities, including hunting, that will be managed by wind farm staff.  <b>Please provide the following:</b>  1. Provide additional information and address each item outlined in the community access program indicated in the SCT Wind Project Community Access Memorandum. Does the Applicant intend "...[t]o allow members of the Moose Camp, Round Mountain, Montgomery Creek, and Burney communities the ability to access portions of SCT property for specific recreational or culturally important activities under a program that will be managed by wind farm staff" as stated in the memorandum on page 1?

Adequacy Issue: Adequate \_\_\_\_\_ Inadequate **X**  
 Technical Area: **Mandatory Opt-in Requirements**

**DATA ADEQUACY WORKSHEET**

Revision No. \_\_\_\_\_ Date February 9, 2023

Project: Fountain Wind

Technical Staff: Negar Vahidi, Eileen Allen,  
Tatiana Inouye, Irene Kaufman

Project Manager: Leonidas Payne

Docket: 23-OPT-01

Technical Senior: Steven Kerr, Joseph Hughes

OPT-IN STATUTES/ REGULATIONS	INFORMATION	OPT-IN PAGE NUMBER AND SECTION NUMBER	ADEQUATE YES OR NO	INFORMATION REQUIRED TO MAKE OPT-IN CONFORM WITH REGULATIONS
Pub. Resources Code § 25545.10(c)	The topics and specific terms in agreements with California Native American tribes may include, but not be limited to, cultural preservation and revitalization programs, joint management and stewardship agreements, open-space preservation agreements, repatriation and reparations agreements, and other compensatory mitigation programs.	TN 248296-2: Community Benefits Program	Yes	
<b>IDENTIFICATION OF PUBLIC AGENCIES THAT RECEIVED NOTICE OF THE APPLICATION</b>				
Cal. Code Regs., tit. 20, § 1879(a)(5)	Identify the public agencies that received notice of the opt-in application.	TN 248322: Pg. v Section: 1.2.5 of Executive Summary and Project Description	Yes	
<b>ENVIRONMENTAL LEADERSHIP DEVELOPMENT PROJECT REQUIREMENTS</b>				
Cal. Code Regs., tit. 20, § 1877(h)	A discussion of whether the project meets the requirements of Public Resources Code sections 21183 and 21183.6.	TN 248321: Crosswalk Matrix pg. 44 (h)	Yes	
Pub. Resources Code § 21183(b)	The project creates high-wage, highly skilled jobs that pay prevailing wages and living wages, provides construction jobs and permanent jobs for Californians, helps reduce unemployment, and promotes apprenticeship training.	TN 248321: Crosswalk Matrix pg. 15 (g1), pg. 16 (A). TN 248292-2: Economics Memo TN 248292-3: Local Economics Memo	Yes	



Adequacy Issue: Adequate \_\_\_\_\_ Inadequate **X**  
 Technical Area: **Mandatory Opt-in Requirements**

**DATA ADEQUACY WORKSHEET**

Revision No. \_\_\_\_\_ Date February 9, 2023

Project: Fountain Wind

Technical Staff: Negar Vahidi, Eileen Allen,  
Tatiana Inouye, Irene  
Kaufman

Project Manager: Leonidas Payne

Docket: 23-OPT-01

Technical Senior: Steven Kerr, Joseph  
Hughes

OPT-IN STATUTES/ REGULATIONS	INFORMATION	OPT-IN PAGE NUMBER AND SECTION NUMBER	ADEQUATE YES OR NO	INFORMATION REQUIRED TO MAKE OPT-IN CONFORM WITH REGULATIONS
Pub. Resources Code § 21183(c)	For a project described in Public Resources Code Section 21180(b)(1), (2), and (3), including a wind or solar energy project or a project that manufactures products, equipment, or components used for renewable energy generation, energy efficiency, or to produce clean alternative fuel vehicles, the project does not result in any net additional emission of greenhouse gases, including greenhouse gas emissions from employee transportation. A project is deemed to meet the requirements of this paragraph if the applicant demonstrates compliance with Public Resources Code section 21183.6.	TN 248288-12: Shasta County DEIR, Section 3.10 Greenhouse Gas Emissions  TN 248291-4: Shasta County DEIR Appendix B Air Quality and Greenhouse Gas Emissions  TN 248321: Crosswalk Matrix pg. 44 (h)	Yes	
Pub. Resources Code § 21183(d)	Demonstrates compliance with the requirements of recycling commercial solid waste and organic solid waste as required under Public Resources Code sections 42649 and 42649.8.	TN 248321: Crosswalk Matrix pg. 44 (h)  TN 248322: Pg. 7 Section: 4.3.2 of Executive Summary and Project Description  TN 248288-13: DEIR Hazards and Hazardous Materials	Yes	

Adequacy Issue: Adequate \_\_\_\_\_ Inadequate **X**  
 Technical Area: **Mandatory Opt-in Requirements**

**DATA ADEQUACY WORKSHEET**

Revision No. \_\_\_\_\_ Date February 9, 2023

Project: Fountain Wind

Technical Staff: Negar Vahidi, Eileen Allen,  
Tatiana Inouye, Irene Kaufman

Project Manager: Leonidas Payne

Docket: 23-OPT-01

Technical Senior: Steven Kerr, Joseph Hughes

OPT-IN STATUTES/ REGULATIONS	INFORMATION	OPT-IN PAGE NUMBER AND SECTION NUMBER	ADEQUATE YES OR NO	INFORMATION REQUIRED TO MAKE OPT-IN CONFORM WITH REGULATIONS
Pub. Resources Code § 21183(e)	Applicant entered into a binding and enforceable agreement that all mitigation measures required to certify the project under this chapter shall be conditions of approval of the project, and those conditions will be fully enforceable by the lead agency or another agency designated by the lead agency. In the case of environmental mitigation measures, the applicant agrees, that those measures will be monitored and enforced by the lead agency for the life of the obligation.	TN 248321: Crosswalk Matrix pg. 44 (h)	Yes	
Pub. Resources Code § 21183(f)	Applicant agrees to pay the costs of the trial court and the court of appeal in hearing and deciding any case challenging a lead agency's action on a certified project under this division...	TN 248321: Crosswalk Matrix pg. 44 (h)	Yes	
Pub. Resources Code § 21183(g)	Applicant agrees to pay the costs of preparing the record of proceedings for the project concurrent with review and consideration of the project under this division...	TN 248321: Crosswalk Matrix pg. 44 (h)	Yes	
Pub. Resources Code § 21183(h)	For a project for which environmental review has commenced, the applicant demonstrates that the record of proceedings is being prepared in accordance with Public Resources section 21186.	TN 248321: Crosswalk Matrix pg. 44 (h)	Yes	

Adequacy Issue: Adequate \_\_\_\_\_ Inadequate **X**  
 Technical Area: **Mandatory Opt-in Requirements**

**DATA ADEQUACY WORKSHEET**

Revision No. \_\_\_\_\_ Date February 9, 2023

Project: Fountain Wind

Technical Staff: Negar Vahidi, Eileen Allen,  
Tatiana Inouye, Irene  
Kaufman

Project Manager: Leonidas Payne

Docket: 23-OPT-01

Technical Senior: Steven Kerr, Joseph  
Hughes

OPT-IN STATUTES/ REGULATIONS	INFORMATION	OPT-IN PAGE NUMBER AND SECTION NUMBER	ADEQUATE YES OR NO	INFORMATION REQUIRED TO MAKE OPT-IN CONFORM WITH REGULATIONS
Pub. Resources Code § 21183.6(a)	The quantification and mitigation of the greenhouse gas emission impacts of a project described in 211880(b)(1), (2), or (3), including a wind or solar energy project or a project that manufactures products, equipment, or components used for renewable energy generation, energy efficiency, or to produce clean alternative fuel vehicles must be as follows:	248288-12: Shasta County DEIR, Section 3.10 Greenhouse Gas Emissions TN  TN 248291-4: Shasta County DEIR Appendix B Air Quality and Greenhouse Gas Emissions	Yes	
Pub. Resources Code § 21183.6(a)(1)	The environmental baseline for greenhouse gas emissions must be established based upon the physical environmental conditions in the vicinity of the project site at the time the application is submitted.	TN 248288-12: Shasta County DEIR, Section 3.10 Greenhouse Gas Emissions  TN 248291-4: Shasta County DEIR Appendix B Air Quality and Greenhouse Gas Emissions	Yes	

<p>Pub. Resources Code § 21183.6(a)(2)</p>	<p>Demonstrate that the mitigation of the impacts resulting from the emissions of greenhouse gases are achieved in the following priority:</p> <ol style="list-style-type: none"> <li>1. Direct emissions reductions from the project that also reduce emissions of criteria air pollutants or toxic air contaminants through implementation of project features, project design, or other measures, including, but not limited to, energy efficiency, installation of renewable energy electricity generation, and reductions in vehicle miles traveled.</li> <li>2. The remaining unmitigated impacts shall be mitigated by direct emissions reductions that also reduce emissions of criteria air pollutants or toxic air contaminants within the same air pollution control district or air quality management district in which the project is located.</li> <li>3. The remaining unmitigated impacts shall be mitigated through the use of offsets that originate within the same air pollution control district or air quality management district in which the project is located. The offsets shall be undertaken in a manner consistent with the Health and Safety Code section 38500, including, but not limited to, the requirement that the offsets be real, permanent, quantifiable, verifiable, and enforceable, and shall be undertaken from sources in the community in which the project is located or in adjacent communities.</li> <li>4. The remaining unmitigated impacts shall be mitigated through the use of offsets that originate from sources that provide a specific, quantifiable, and direct environmental and public health benefit to the region in which the project is located.</li> </ol>	<p>TN 48288-5: Shasta County DEIR, Section 3.3 Air Quality</p> <p>TN 248288-12: Shasta County DEIR, Section 3.10 Greenhouse Gas Emissions</p> <p>TN 248291-4: Shasta County DEIR Appendix B Air Quality and Greenhouse Gas Emissions</p>	<p>Yes</p>	
--	---	--	------------	--

**POTENTIAL FOR RESTORING THE SITE IF APPLICATION REJECTED**

Adequacy Issue: Adequate \_\_\_\_\_ Inadequate **X**  
 Technical Area: **Mandatory Opt-in Requirements**

**DATA ADEQUACY WORKSHEET**

Project: Fountain Wind

Revision No. \_\_\_\_\_ Date February 9, 2023

Technical Staff: Negar Vahidi, Eileen Allen,  
Tatiana Inouye, Irene  
Kaufman

Project Manager: Leonidas Payne

Docket: 23-OPT-01

Technical Senior: Steven Kerr, Joseph  
Hughes

OPT-IN STATUTES/ REGULATIONS	INFORMATION	OPT-IN PAGE NUMBER AND SECTION NUMBER	ADEQUATE YES OR NO	INFORMATION REQUIRED TO MAKE OPT-IN CONFORM WITH REGULATIONS
Cal. Code Regs., tit. 20, § 1879(a)(3)	Demonstrate the potential for restoring the site as necessary to protect the environment if the Energy Commission denies approval of the application.	TN 248322: Pg. 13 Section: 4.4.6 of Executive Summary and Project Description	Yes	
<b>PUBLIC BENEFITS INHERENT IN THE PROJECT INCLUDING ECONOMIC, ENVIRONMENTAL AND ELECTRIC RELIABILITY BENEFITS</b>				
Cal. Code Regs., tit. 20 § 1879(a)(4)	Demonstrate the public benefits from the project including economic benefits, environmental benefits, and electricity reliability benefits.	TN 248322: Pg. ix Section: 1.3 4.4.6 of Executive Summary and Project Description  TN 248292-2: Economics Memo  TN 248292-3: Local Economics Memo  TN 248296-2: Community Benefits Program	Yes	

Technical Area: Alternatives  
 Project Manager: Lon Payne

Project: Fountain Wind Project  
 Docket: 23-OPT-01

Technical Staff: Negar Vahidi, Tatiana Inouye  
 Technical Senior: Steve Kerr

SITING REGULATIONS	INFORMATION	AFC PAGE NUMBER AND SECTION NUMBER	ADEQUATE YES OR NO	INFORMATION REQUIRED TO MAKE AFC CONFORM WITH REGULATIONS
Appendix B (b) (1) (D)	A description of how the site and related facilities were selected, and the consideration given to engineering constraints, site geology, environmental impacts, water, waste and fuel constraints, electric transmission constraints, and any other factors considered by the applicant.	TN 248288: DEIR Description of Project and Alternatives; pages 2-1 to 2-40	No	<b>Please discuss how the project location was selected as the proposed site, and what factors were used to screen alternatives (i.e., site suitability, location of sensitive resources, jurisdictional boundaries, etc.)</b> The 2020 DEIR does not disclose the process used to identify and select the project location as the proposed site for analysis. This site selection criteria is necessary to screen the alternatives for site suitability.
Appendix B (f) (1)	A discussion of the range of reasonable alternatives to the project, or to the location of the project, including the no project alternative, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project, and an evaluation of the comparative merits of the alternatives. In accordance with Public Resources Code section 25540.6(b), a discussion of the applicant's site selection criteria, any alternative sites considered for the project, and the reasons why the applicant chose the proposed site.	TN 248288: DEIR Description of Project and Alternatives; Sections 2.3 and 2.5; pages 2-6, 2-28 to 2-30  TN 248322: Executive Summary and Project Description; Section 1.3.1.3; page xii  <b>NOT DOCKETED:</b> Fountain Wind Project Draft EIR Chapter 1 (Introduction); pages 1-1 to 1-8  File was obtained from the following site: <a href="https://www.shastacounty.gov/planning/page/draft-eir-fountain-wind-project">https://www.shastacounty.gov/planning/page/draft-eir-fountain-wind-project</a>	No	<b>Please explain the purpose or need for each of the 9 project objectives.</b> CEQA Guidelines Section 15126.6(a) requires that the alternatives evaluation discuss a reasonable range of alternatives that feasibly attain most of the basic objectives. The 2020 DEIR Project Description (Section 2.3) provides a wide range of 9 project objectives, but does not explain how or why these objectives are essential to the project. CEQA Guidelines Section 15124(b) requires that the statement of objectives include the underlying purpose of the project, which will facilitate the development of a reasonable range of alternatives. Please include the following details in the Description of Project/Alternatives: how and why the proposed site was selected, how capacity and generation targets were identified, and why job creation and revenue is a basic objective of the project.  <b>Please provide a feasible off-site alternative for evaluation.</b> The 2020 DEIR

Technical Area: Alternatives  
 Project Manager: Lon Payne

Project: Fountain Wind Project  
 Docket: 23-OPT-01

Technical Staff: Negar Vahidi, Tatiana Inouye  
 Technical Senior: Steve Kerr

SITING REGULATIONS	INFORMATION	AFC PAGE NUMBER AND SECTION NUMBER	ADEQUATE YES OR NO	INFORMATION REQUIRED TO MAKE AFC CONFORM WITH REGULATIONS
				<p>did not evaluate an off-site alternative because the project site was considered consistent with the County's existing plans, policies and zoning (DEIR page 2-29). However, the Shasta County Board of Supervisors adopted an ordinance in July 2022 to amend Section 17.88.035 of the County's Zoning Plan prohibiting large wind energy systems in all zone districts. The proposed project is no longer consistent with existing zoning, and an off-site alternative should be included for evaluation to avoid or reduce the effect (per CEQA Guidelines Section 15126.6(b)) of a significant and unavoidable land use impact.</p>
<p>Appendix B (f) (2)</p>	<p>An evaluation of the comparative engineering, economic, and environmental merits of the alternatives discussed in (f)(1).</p>	<p>TN 248288: DEIR Comparison of Alternatives; Section 4.2; page 4-2 to 4-7</p>	<p>No</p>	<p><b>Please include the No Project Alternative in the Comparative Analysis of Alternatives.</b> CEQA Guidelines Section 15126.6(e)(2) explains that the No Project Alternative must discuss two scenarios: (1) the existing conditions at the time that the NOP is published, and (2) what would be reasonably expected to occur in the foreseeable future if the project were not approved, based on current plans and consistent with available infrastructure and community services.</p> <p>Note that since the application was recently filed with the Energy Commission and a new CEQA environmental review process will be conducted for the proposed project, the previous date of NOP publication cannot be used for baseline conditions (for example, there are new site</p>

Technical Area: Alternatives  
 Project Manager: Lon Payne

Project: Fountain Wind Project  
 Docket: 23-OPT-01

Technical Staff: Negar Vahidi, Tatiana Inouye  
 Technical Senior: Steve Kerr

SITING REGULATIONS	INFORMATION	AFC PAGE NUMBER AND SECTION NUMBER	ADEQUATE YES OR NO	INFORMATION REQUIRED TO MAKE AFC CONFORM WITH REGULATIONS
				<p>development restrictions by County ordinance). Therefore, the updated baseline condition of the proposed project site must be considered in the development of the No Project alternative scenarios.</p> <p>The 2020 DEIR Section 4.2 does not provide a full analysis of the No Project Alternative. It is inadequate to state that there are no impacts because there is no project without providing a resource specific discussion of the activities that would occur in the foreseeable future. The Comparison of Alternatives analysis should include the No Project Alternative in its analysis of each alternative for each resource area.</p>



Adequacy Issue: Adequate \_\_\_\_\_ Inadequate  X   
 Technical Area:  Air Quality   
 Project Manager:  Leonidas Payne

**DATA ADEQUACY WORKSHEET**

Project:  Fountain Wind Project   
 Docket:  23-OPT-01

Revision No.  0  Date  1/31/2023   
 Technical Staff:  Joseph Hughes   
 Technical Senior:  Joseph Hughes

SITING REGULATIONS	INFORMATION	AFC PAGE NUMBER AND SECTION NUMBER	ADEQUATE YES OR NO	INFORMATION REQUIRED TO MAKE AFC CONFORM WITH REGULATIONS
Appendix B (g) (1)	...provide a discussion of the existing site conditions, the expected direct, indirect and cumulative impacts due to the construction, operation and maintenance of the project, the measures proposed to mitigate adverse environmental impacts of the project, the effectiveness of the proposed measures, and any monitoring plans proposed to verify the effectiveness of the mitigation.	Shasta County DEIR, Section 3.3 Air Quality (TN 48288-5); Shasta County DEIR, Section 3.10 Greenhouse Gas Emissions (TN 248288-12); Shasta County DEIR Appendix B Air Quality and Greenhouse Gas Emissions (TN 248291-4)	No	<p><b>Background: Construction and Operational Emissions and Assumptions</b> - The construction and operational emission estimates and assumptions provided in the DEIR were based on the first revision to the original project proposal from 2019 (published by Shasta County in July 2020). The current proposal would, among other things, reduce the number of wind turbines being constructed from 72 to 48, decrease the permanent disturbance area from 180 acres to 120 acres, reduce the vehicle and equipment miles traveled on onsite unpaved roads and access roads, reduce the number of turbine deliveries from the port, and other proposed changes that could reduce or change the construction and operational related emissions.</p> <p><b>Request: Construction and Operational Emissions and Assumptions</b> - Please update the construction and operational related emission estimates to reflect the emissions that would be generated from the currently proposed project. Please provide a detailed construction schedule that explains the activities that would occur during each phase of construction, including a description of how long construction would occur at each wind turbine tower pad, whether the turbines and pads would be installed one at a time or in groups, and whether construction activities would be occurring</p>

Adequacy Issue: Adequate \_\_\_\_\_ Inadequate  X   
 Technical Area:  Air Quality   
 Project Manager:  Leonidas Payne

**DATA ADEQUACY WORKSHEET**

Project:  Fountain Wind Project   
 Docket:  23-OPT-01

Revision No.  0  Date  1/31/2023   
 Technical Staff:  Joseph Hughes   
 Technical Senior:  Joseph Hughes

SITING REGULATIONS	INFORMATION	AFC PAGE NUMBER AND SECTION NUMBER	ADEQUATE YES OR NO	INFORMATION REQUIRED TO MAKE AFC CONFORM WITH REGULATIONS
				<p>continuously throughout the entirety of the project site or if construction activities would move throughout the site as completion of the installation of the turbines and pads are completed. This will help staff identify when and where construction related impacts are occurring and for how long. Please provide the locations and distances of sensitive receptors with respect to these activities. Please provide a detailed discussion on all assumptions used to generate the updated construction and operational emission estimates. Please update all aspects of DEIR Appendix B Air Quality and Greenhouse Gas Emissions as necessary based on the revised project description. Please provide the Excel spreadsheets with live, embedded calculations so staff can verify the emission estimates and assumptions.</p> <p><b>Background: Emergency Generator</b> - DEIR page 3.3-23 explains that a 268 horsepower (hp) emergency generator would be used.</p> <p><b>Request: Emergency Generator</b> – Please provide information on the engine manufacturer, including the manufacturer specification sheets and emissions data. Please provide a description or figure explaining where the engine would be located. Please provide the distances of sensitive receptors to the emergency engine location.</p>

Adequacy Issue: Adequate \_\_\_\_\_ Inadequate  X   
 Technical Area:  Air Quality   
 Project Manager:  Leonidas Payne

**DATA ADEQUACY WORKSHEET**  
 Project:  Fountain Wind Project   
 Docket:  23-OPT-01

Revision No.  0  Date  1/31/2023   
 Technical Staff:  Joseph Hughes   
 Technical Senior:  Joseph Hughes

SITING REGULATIONS	INFORMATION	AFC PAGE NUMBER AND SECTION NUMBER	ADEQUATE YES OR NO	INFORMATION REQUIRED TO MAKE AFC CONFORM WITH REGULATIONS
Appendix B (g) (8) (A)	The information necessary for the air pollution control district where the project is located to complete a Determination of Compliance.	Shasta County DEIR, Section 3.3 Air Quality (TN 48288-5); Shasta County DEIR, Section 3.10 Greenhouse Gas Emissions (TN 248288-12); Shasta County DEIR Appendix B Air Quality and Greenhouse Gas Emissions (TN 248291-4)	No	<p><b>Background: Emergency Generator</b> - The project would utilize a 268 horsepower (hp) emergency generator that would operate for testing and maintenance purposes. The emergency generator would require a permit to operate (PTO) from the Shasta County AQMD. Energy Commission staff will need to incorporate portions of the Shasta County AQMD engineering evaluation and PTO into its EIR.</p> <p><b>Request: Emergency Generator</b> - Please provide a completeness determination from the Shasta County AQMD confirming that the district has everything it needs to complete its review of this project and provide an engineering evaluation and permit to operate.</p>
Appendix B (g) (8) (B)	The heating value and chemical characteristics of the proposed fuels, the stack height and diameter, the exhaust velocity and temperature, the heat rate and the expected capacity factor of the proposed facility.	N/A	Yes	
Appendix B (g) (8) (C)	A description of the control technologies proposed to limit the emission of criteria pollutants.	Shasta County DEIR, Section 3.3 Air Quality (TN 48288-5); Shasta County DEIR Appendix B Air Quality and Greenhouse Gas Emissions (TN 248291-4)	Yes	
Appendix B (g) (8) (D)	A description of the cooling system, the estimated cooling tower drift rate, the rate of water flow through the cooling tower, and the	N/A	Yes	

Adequacy Issue: Adequate \_\_\_\_\_ Inadequate **X**  
 Technical Area: **Air Quality**  
 Project Manager: Leonidas Payne

**DATA ADEQUACY WORKSHEET**  
 Project: **Fountain Wind Project**  
 Docket: 23-OPT-01

Revision No. 0 Date 1/31/2023  
 Technical Staff: Joseph Hughes  
 Technical Senior: Joseph Hughes

SITING REGULATIONS	INFORMATION	AFC PAGE NUMBER AND SECTION NUMBER	ADEQUATE YES OR NO	INFORMATION REQUIRED TO MAKE AFC CONFORM WITH REGULATIONS
	maximum concentrations of total dissolved solids.			
Appendix B (g) (8) (E)	The emission rates of criteria pollutants and greenhouse gases (CO <sub>2</sub> , CH <sub>4</sub> , N <sub>2</sub> O, and SF <sub>6</sub> ) from the stack, cooling towers, fuels and materials handling processes, delivery and storage systems, and from all on-site secondary emission sources.	Shasta County DEIR, Section 3.3 Air Quality (TN 48288-5); Shasta County DEIR, Section 3.10 Greenhouse Gas Emissions (TN 248288-12); Shasta County DEIR Appendix B Air Quality and Greenhouse Gas Emissions (TN 248291-4)	Yes	
Appendix B (g) (8) (F)(i)	A description of typical operational modes, and start-up and shutdown modes for the proposed project, including the estimated frequency of occurrence and duration of each mode, and estimated emission rate for each criteria pollutant during each mode.	N/A	Yes	
Appendix B (g) (8) (F)(ii)	A description of the project's planned initial commissioning phase, which is the phase between the first firing of emissions sources and the commercial operations date, including the types and durations of equipment tests, criteria pollutant emissions, and monitoring techniques to be used during such tests.	N/A	Yes	
Appendix B (g) (8) (G)	The ambient concentrations of all criteria pollutants for the previous three years as measured at the three Air Resources Board certified monitoring stations located closest to the project site, and an analysis of whether this data is representative of conditions at the	Shasta County DEIR, Section 3.3 Air Quality (TN 48288-5)	Yes	

Adequacy Issue: Adequate \_\_\_\_\_ Inadequate **X**  
 Technical Area: **Air Quality**  
 Project Manager: Leonidas Payne

**DATA ADEQUACY WORKSHEET**  
 Project: **Fountain Wind Project**  
 Docket: 23-OPT-01

Revision No. 0 Date 1/31/2023  
 Technical Staff: Joseph Hughes  
 Technical Senior: Joseph Hughes

SITING REGULATIONS	INFORMATION	AFC PAGE NUMBER AND SECTION NUMBER	ADEQUATE YES OR NO	INFORMATION REQUIRED TO MAKE AFC CONFORM WITH REGULATIONS
	project site. The applicant may substitute an explanation as to why information from one, two, or all stations is either not available or unnecessary.			
Appendix B (g) (8) (H)	One year of meteorological data collected from either the Federal Aviation Administration Class 1 station nearest to the project or from the project site, or meteorological data approved by the California Air Resources Board or the local air pollution control district.	Not included	No	If it's determined that an air quality modeling analysis is required under Appendix B (g)(8)(I)(i) or Appendix B (g)(8)(I)(ii) below, then please provide the meteorological data approved by the California Air Resources Board or the local air pollution control district.
Appendix B (g) (8) (H) (i)	If the data is collected from the project site, the applicant shall demonstrate compliance with the requirements of the U.S. Environmental Protection Agency document entitled "On-Site Meteorological Program Guidance for Regulatory Modeling Applications" (EPA - 450/4-87-013 (August 1995)), which is incorporated by reference in its entirety.	N/A	Yes	
Appendix B (g) (8) (H) (ii)	The data shall include quarterly wind tables and wind roses, ambient temperatures, relative humidity, stability and mixing heights, upper atmospheric air data, and an analysis of whether this data is representative of conditions at the project site.	Not included	No	If it's determined that an air quality modeling analysis is required under Appendix B (g)(8)(I)(i) or Appendix B (g)(8)(I)(ii) below, then please provide the meteorological data with the information required under Appendix B (g)(8)(H)(ii).
Appendix B (g) (8) (I)	An evaluation of the project's direct and cumulative air quality impacts, consisting of:			
Appendix B (g) (8) (I) (i)	A screening level air quality modeling analysis, or a more detailed modeling analysis if so desired by the applicant, of the direct criteria pollutant impacts of project construction activities on ambient air quality conditions,	Shasta County DEIR, Section 3.3 Air Quality (TN 48288-5); Shasta County DEIR Appendix B Air Quality and Greenhouse	No	Provide the air quality modeling analysis to determine construction related impacts consistent with the revised construction emission estimates and assumptions as requested under Appendix B (g)(8)(A) requirements above.

Adequacy Issue: Adequate \_\_\_\_\_ Inadequate **X**  
 Technical Area: **Air Quality**  
 Project Manager: Leonidas Payne

**DATA ADEQUACY WORKSHEET**  
 Project: **Fountain Wind Project**  
 Docket: 23-OPT-01

Revision No. 0 Date 1/31/2023  
 Technical Staff: Joseph Hughes  
 Technical Senior: Joseph Hughes

SITING REGULATIONS	INFORMATION	AFC PAGE NUMBER AND SECTION NUMBER	ADEQUATE YES OR NO	INFORMATION REQUIRED TO MAKE AFC CONFORM WITH REGULATIONS
	including fugitive dust (PM <sub>10</sub> ) emissions from grading, excavation and site disturbance, as well as the combustion emissions [nitrogen oxides (NO <sub>x</sub> ), sulfur dioxide (SO <sub>2</sub> ), carbon monoxide (CO), and particulate matter less than 10 microns in diameter (PM <sub>10</sub> ) and particulate matter less than 2.5 microns in diameter (PM <sub>2.5</sub> ) from construction-related equipment;	Gas Emissions (TN 248291-4)		Otherwise, provide a detailed justification of why such modeling isn't required for this project based on the revised construction emission estimates and assumptions as requested under Appendix B (g)(8)(A) requirements above.
Appendix B (g) (8) (I) (ii)	A screening level air quality modeling analysis, or a more detailed modeling analysis if so desired by the applicant, of the direct criteria pollutant (NO <sub>x</sub> , SO <sub>2</sub> , CO, PM <sub>10</sub> , and PM <sub>2.5</sub> ) impacts on ambient air quality conditions of the project during typical (normal) operation, and during shutdown and startup modes of operation. Identify and include in the modeling of each operating mode the estimated maximum emissions rates and the assumed meteorological conditions;	Shasta County DEIR, Section 3.3 Air Quality (TN 48288-5); Shasta County DEIR Appendix B Air Quality and Greenhouse Gas Emissions (TN 248291-4)	No	Provide the air quality modeling analysis for the readiness testing and maintenance of the 268 hp emergency generator.  Otherwise, provide a detailed justification of why such modeling isn't required for this project. Including a description of the engine location on the site, the distance to sensitive receptors, etc.
Appendix B (g) (8) (I) (iii)	A protocol for a cumulative air quality modeling impacts analysis of the project's typical operating mode in combination with other stationary emissions sources within a 6-mile radius that have received construction permits but are not yet operational or are in the permitting process. The cumulative inert pollutant impact analysis should assess whether estimated emissions concentrations will cause or contribute to a violation of any ambient air quality standard; and	N/A	Yes	

Adequacy Issue: Adequate \_\_\_\_\_ Inadequate **X**  
 Technical Area: **Air Quality**  
 Project Manager: Leonidas Payne

**DATA ADEQUACY WORKSHEET**  
 Project: **Fountain Wind Project**  
 Docket: 23-OPT-01

Revision No. 0 Date 1/31/2023  
 Technical Staff: Joseph Hughes  
 Technical Senior: Joseph Hughes

SITING REGULATIONS	INFORMATION	AFC PAGE NUMBER AND SECTION NUMBER	ADEQUATE YES OR NO	INFORMATION REQUIRED TO MAKE AFC CONFORM WITH REGULATIONS
Appendix B (g) (8) (I) (iv)	An air dispersion modeling analysis of the impacts of the initial commissioning phase emissions on state and federal ambient air quality standards for NO <sub>x</sub> , SO <sub>2</sub> , CO, PM <sub>10</sub> , and PM <sub>2.5</sub> .	N/A	Yes	
Appendix B (g) (8) (J)	If an emission offset strategy is proposed to mitigate the project's impacts under (g)(1), provide:			
Appendix B (g) (8) (J) (i)	The quantity of offsets or emission reductions that are needed to satisfy air permitting requirements of local permitting agencies (such as the air district), state and federal oversight air agencies, and the California Energy Commission. Identify by criteria air pollutant, and if appropriate, greenhouse gas; and	N/A	Yes	
Appendix B (g) (8) (J) (ii)	Potential offset sources, including location, and quantity of emission reductions;	N/A	Yes	
Appendix B (g) (8) (K)	A detailed description of the mitigation, if any, which an applicant may propose, for all projects impacts from criteria pollutants that currently exceed state or federal ambient air quality standards but are not subject to offset requirements under the district's new source review rule.	Shasta County DEIR, Section 3.3 Air Quality (TN 48288-5); Shasta County DEIR, Section 3.10 Greenhouse Gas Emissions (TN 248288-12); Shasta County DEIR Appendix B Air Quality and Greenhouse Gas Emissions (TN 248291-4)	Yes	
Appendix B (i) (1) (A)	Tables that identify laws, regulations, ordinances, standards, adopted local, regional, state, and federal land use plans, leases, and permits applicable to the proposed project, and	Shasta County DEIR, Section 3.3 Air Quality (TN 48288-5); Shasta County DEIR, Section 3.10	No	Please provide the tables and information required by Appendix B (i)(1)(A) related to air quality.

Adequacy Issue: Adequate \_\_\_\_\_ Inadequate **X**  
 Technical Area: **Air Quality**  
 Project Manager: Leonidas Payne

**DATA ADEQUACY WORKSHEET**  
 Project: **Fountain Wind Project**  
 Docket: 23-OPT-01

Revision No. 0 Date 1/31/2023  
 Technical Staff: Joseph Hughes  
 Technical Senior: Joseph Hughes

SITING REGULATIONS	INFORMATION	AFC PAGE NUMBER AND SECTION NUMBER	ADEQUATE YES OR NO	INFORMATION REQUIRED TO MAKE AFC CONFORM WITH REGULATIONS
	a discussion of the applicability of, and conformance with each. The table or matrix shall explicitly reference pages in the application wherein conformance, with each law or standard during both construction and operation of the facility is discussed; and	Greenhouse Gas Emissions (TN 248288-12)		
Appendix B (i) (1) (B)	Tables that identify each agency with jurisdiction to issue applicable permits, leases, and approvals or to enforce identified laws, regulations, standards, and adopted local, regional, state and federal land use plans, and agencies that would have permit approval or enforcement authority, but for the exclusive authority of the Commission to certify sites and related facilities.	Shasta County DEIR, Section 3.3 Air Quality (TN 48288-5); Shasta County DEIR, Section 3.10 Greenhouse Gas Emissions (TN 248288-12)	No	Please provide the information required by Appendix B (i)(1)(B), including the contact information to the permit engineer from the Shasta County AQMD assigned to this project.
Appendix B (i) (2)	The name, title, phone number, address (required), and email address (if known), of an official who was contacted within each agency, and provide the name of the official who will serve as a contact person for Commission staff.	Shasta County DEIR, Section 3.3 Air Quality (TN 48288-5); Shasta County DEIR, Section 3.10 Greenhouse Gas Emissions (TN 248288-12)	Yes	
Appendix B (i) (3)	A schedule indicating when permits outside the authority of the commission will be obtained and the steps the applicant has taken or plans to take to obtain such permits.	Shasta County DEIR, Section 3.3 Air Quality (TN 48288-5)	No	Please provide a schedule indicating when the necessary permits from the Shasta County AQMD will be obtained.



Adequacy Issue: Adequate \_\_\_\_\_ Inadequate **X** **DATA ADEQUACY WORKSHEET**  
 Technical Area: **Biological Resources** Project: **Fountain Wind Project**

Revision No. 1 Date 1-31-2023  
 Technical Staff: Carol Watson, Chris Huntley, Justin Wood, Leane Dunn, Elliot Maldonado  
 Technical Senior: Jon Hilliard

Project Manager: Leonidas Payne Dock et: 23-OPT-01

SITING REGULATIONS	INFORMATION	AFC PAGE NUMBER AND SECTION NUMBER	ADEQUATE YES OR NO	INFORMATION REQUIRED TO MAKE AFC CONFORM WITH REGULATIONS
Appendix B (g) (1)	...provide a discussion of the existing site conditions, the expected direct, indirect and cumulative impacts due to the construction, operation and maintenance of the project, the measures proposed to mitigate adverse environmental impacts of the project, the effectiveness of the proposed measures, and any monitoring plans proposed to verify the effectiveness of the mitigation.	DEIR Biological Resources TN # 248288-6 Pages 3.4-9 to 3.4-14 (Table 3.4-3) Pages 3.4-38 to 3.4-39 Pages 3.4-59-3.4-59 Pages 3.4-45-3.4-48 (California Spotted Owl) TN # 24318 (Fountain Site Characteristic Study) Pages 15-21, 29-31, 38-39, 42-45, 48-50, and 55-59.	No	<p><b>Topic:</b> Table 3.4-3 (Special-Status Wildlife Species with Potential to Occur Within the Project Site and supporting text must include a discussion of all sensitive gastropods, which may be subject to direct and/or indirect effects. Some of these species include canary dusksnail (<i>Colligyrus convexus</i>), nugget pebblesnail (<i>Fluminicola seminalis</i>), western ridged mussel (<i>Gonidea angulata</i>), Oregon shoulderband (<i>Helminthoglypta hertleini</i>), scalloped juga (<i>Juga occata</i>), kneecap lanx (<i>Lanx patelloides</i>), western pearlshell (<i>Margaritifera falcata</i>), Klamath sideband (<i>Monadenia churchi</i>), Wintu sideband (<i>Monadenia troglodytes wintu</i>), Shasta chaparral (<i>Trilobopsis roperi</i>).</p> <p>In addition, the DEIR must minimally include sensitive species as identified during CEC staff's independent nine-quad topographic quadrangle search (a standard CNDDDB search criterion). This query yielded 2 amphibian species, 11 bird species (2 of the 9 were mentioned in text), 10 fish species, (5 of 10 mentioned in text), 16 invertebrate species, and 3 mammal species (mentioned in text but not listed in Table 3.4-3). While staff concurs that some of these species</p>

Adequacy Issue: Adequate \_\_\_\_\_ Inadequate **X** **DATA ADEQUACY WORKSHEET**  
 Technical Area: **Biological Resources** Project: **Fountain Wind Project**

Revision No. 1 Date 1-31-2023  
 Technical Staff: Carol Watson, Chris Huntley, Justin Wood, Leane Dunn, Elliot Maldonado  
 Technical Senior: Jon Hilliard

Project Manager: Leonidas Payne Docket: 23-OPT-01

SITING REGULATIONS	INFORMATION	AFC PAGE NUMBER AND SECTION NUMBER	ADEQUATE YES OR NO	INFORMATION REQUIRED TO MAKE AFC CONFORM WITH REGULATIONS															
				<p>would not occur because of their proximity to the project, they should be addressed and dismissed from analysis if appropriate. See table below for a summary of some of the species which must be addressed.</p> <table border="1" data-bbox="1436 732 2045 1386"> <thead> <tr> <th data-bbox="1436 732 1661 948">Species</th> <th data-bbox="1667 732 1864 948">Name</th> <th data-bbox="1871 732 2045 948">Mentioned in Applicant's DEIR Table 3.4-3</th> </tr> </thead> <tbody> <tr> <td data-bbox="1436 953 1661 1086"><i>Hydromantes samweli</i></td> <td data-bbox="1667 953 1864 1086">Samwel Shasta salamander</td> <td data-bbox="1871 953 2045 1086">No</td> </tr> <tr> <td data-bbox="1436 1091 1661 1187"><i>Hydromantes wintu</i></td> <td data-bbox="1667 1091 1864 1187">Wintu shasta salamander</td> <td data-bbox="1871 1091 2045 1187">No</td> </tr> <tr> <td data-bbox="1436 1192 1661 1287"><i>Ardea herodias</i></td> <td data-bbox="1667 1192 1864 1287">great blue heron</td> <td data-bbox="1871 1192 2045 1287">No</td> </tr> <tr> <td data-bbox="1436 1292 1661 1386"><i>Baeolophus inornatus</i></td> <td data-bbox="1667 1292 1864 1386">Oak Titmouse</td> <td data-bbox="1871 1292 2045 1386">No</td> </tr> </tbody> </table>	Species	Name	Mentioned in Applicant's DEIR Table 3.4-3	<i>Hydromantes samweli</i>	Samwel Shasta salamander	No	<i>Hydromantes wintu</i>	Wintu shasta salamander	No	<i>Ardea herodias</i>	great blue heron	No	<i>Baeolophus inornatus</i>	Oak Titmouse	No
Species	Name	Mentioned in Applicant's DEIR Table 3.4-3																	
<i>Hydromantes samweli</i>	Samwel Shasta salamander	No																	
<i>Hydromantes wintu</i>	Wintu shasta salamander	No																	
<i>Ardea herodias</i>	great blue heron	No																	
<i>Baeolophus inornatus</i>	Oak Titmouse	No																	

Adequacy Issue: Adequate \_\_\_\_\_ Inadequate **X** **DATA ADEQUACY WORKSHEET**  
 Technical Area: **Biological Resources** Project: **Fountain Wind Project**

Revision No. 1 Date 1-31-2023  
 Technical Staff: Carol Watson, Chris Huntley, Justin Wood, Leane Dunn, Elliot Maldonado  
 Technical Senior: Jon Hilliard

Project Manager: Leonidas Payne Docket: 23-OPT-01

SITING REGULATIONS	INFORMATION	AFC PAGE NUMBER AND SECTION NUMBER	ADEQUATE YES OR NO	INFORMATION REQUIRED TO MAKE AFC CONFORM WITH REGULATIONS		
				<i>Coccothraustes vespertinus</i>	Evening Grosbeak	No
				<i>Cypseloides niger</i>	black swift	No
				<i>Laterallus jamaicensis coturniculus</i>	California black rail	No
				<i>pelecanus erythrorhynchos</i>	American White Pelican	3.4-24 Paragraph 1 not in table
				<i>Pandion haliaetus</i>	osprey	3.4-23 Paragraph 1 & 2 not in table
				<i>Phalacrocorax auritus</i>	double-crested cormorant	No

Adequacy Issue: Adequate \_\_\_\_\_ Inadequate **X** **DATA ADEQUACY WORKSHEET**

Technical Area: **Biological Resources** Project: **Fountain Wind Project**

Revision No. 1 Date 1-31-2023

Technical Staff: Carol Watson, Chris Huntley, Justin Wood, Leane Dunn, Elliot Maldonado

Project Manager: Leonidas Payne Docket: 23-OPT-01

Technical Senior: Jon Hilliard

SITING REGULATIONS	INFORMATION	AFC PAGE NUMBER AND SECTION NUMBER	ADEQUATE YES OR NO	INFORMATION REQUIRED TO MAKE AFC CONFORM WITH REGULATIONS		
				<i>Progne subis</i>	purple martin	No
				<i>Riparia riparia</i>	bank swallow	No
				<i>selasphorus rufus</i>	Rufous Hummingbird	No
				<i>Acipenser medirostris pop. 1</i>	green sturgeon - southern DPS	No
				<i>Cottus asperimus</i>	rough sculpin	No
				<i>Cottus klamathensis macrops</i>	bigeye marbled sculpin	3.4-16 Paragraph 2, not in table
				<i>Entosphenus lethophagus</i>	Pit-Klamath brook lamprey	No

Adequacy Issue: Adequate \_\_\_\_\_ Inadequate **X** **DATA ADEQUACY WORKSHEET**  
 Technical Area: **Biological Resources** Project: **Fountain Wind Project**

Revision No. 1 Date 1-31-2023  
 Technical Staff: Carol Watson, Chris Huntley, Justin Wood, Leane Dunn, Elliot Maldonado  
 Technical Senior: Jon Hilliard

Project Manager: Leonidas Payne Docket: 23-OPT-01

SITING REGULATIONS	INFORMATION	AFC PAGE NUMBER AND SECTION NUMBER	ADEQUATE YES OR NO	INFORMATION REQUIRED TO MAKE AFC CONFORM WITH REGULATIONS		
				<i>Entosphenus tridentatus</i>	Pacific lamprey	3.4-16 Paragraph 2, not in table
				<i>Hypomesus transpacificus</i>	Delta Smelt	No
				<i>Mylopharodon conocephalus</i>	hardhead	3.4-16 Paragraph 2, not in table
				<i>Oncorhynchus mykiss ssp. 2</i>	McCloud River redband trout	3.4-16 Paragraph 2, not in table
				<i>Spirinchus thaleichthys</i>	Longfin Smelt	No

Adequacy Issue: Adequate \_\_\_\_\_ Inadequate **X** **DATA ADEQUACY WORKSHEET**  
 Technical Area: **Biological Resources** Project: **Fountain Wind Project**

Revision No. 1 Date 1-31-2023  
 Technical Staff: Carol Watson, Chris Huntley, Justin Wood, Leane Dunn, Elliot Maldonado  
 Technical Senior: Jon Hilliard

Project Manager: Leonidas Payne  
 Docket: 23-OPT-01

SITING REGULATIONS	INFORMATION	AFC PAGE NUMBER AND SECTION NUMBER	ADEQUATE YES OR NO	INFORMATION REQUIRED TO MAKE AFC CONFORM WITH REGULATIONS		
				<i>Oncorhynchus mykiss ssp. 2</i>	McCloud River redband trout	3.4-16 Paragraph 2, not in table
				<i>Atractelmis wawona</i>	Wawona riffle beetle	No
				<i>Bombus occidentalis</i>	western bumble bee	No
				<i>Danaus plexippus</i>	Monarch Butterfly	No
				<i>Lepidurus cryptus</i>	cryptic tadpole shrimp	No
				<i>Ariolimax buttoni</i>	Button's banana slug	No
				<i>Colligyrus convexus</i>	canary dusksnail	No

Adequacy Issue: Adequate \_\_\_\_\_ Inadequate **X** **DATA ADEQUACY WORKSHEET**  
 Technical Area: **Biological Resources** Project: **Fountain Wind Project**

Revision No. 1 Date 1-31-2023  
 Technical Staff: Carol Watson, Chris Huntley, Justin Wood, Leane Dunn, Elliot Maldonado  
 Technical Senior: Jon Hilliard

Project Manager: Leonidas Payne Docket: 23-OPT-01

SITING REGULATIONS	INFORMATION	AFC PAGE NUMBER AND SECTION NUMBER	ADEQUATE YES OR NO	INFORMATION REQUIRED TO MAKE AFC CONFORM WITH REGULATIONS		
				<i>Fluminicola seminalis</i>	nugget pebblesnail	No
				<i>Gonidea angulata</i>	western ridged mussel	No
				<i>Helminthoglypta hertleini</i>	Oregon shoulderband	No
				<i>Juga occata</i>	scalloped juga	No
				<i>Lanx patelloides</i>	kneecap lanx	No
				<i>Margaritifera falcata</i>	western pearlshell	No
				<i>Monadenia churchi</i>	Klamath sideband	No
				<i>Monadenia troglodytes wintu</i>	Wintu sideband	No

Adequacy Issue: Adequate \_\_\_\_\_ Inadequate **X** **DATA ADEQUACY WORKSHEET**  
 Technical Area: **Biological Resources** Project: **Fountain Wind Project**

Revision No. 1 Date 1-31-2023  
 Technical Staff: Carol Watson, Chris Huntley, Justin Wood, Leane Dunn, Elliot Maldonado  
 Technical Senior: Jon Hilliard

Project Manager: Leonidas Payne Docket: 23-OPT-01

SITING REGULATIONS	INFORMATION	AFC PAGE NUMBER AND SECTION NUMBER	ADEQUATE YES OR NO	INFORMATION REQUIRED TO MAKE AFC CONFORM WITH REGULATIONS		
				<i>Trilobopsis roperi</i>	Shasta chaparral	No
				<i>Vespericola shasta</i>	Shasta hesperian	No
				<i>Erethizon dorsatum</i>	North American porcupine	3.4-15 Paragraph 1, not in table
				<i>Lasionycteris noctivagans</i>	silver-haired bat	3.4-15 Paragraph 1, not in table
				<i>Martes caurina sierrae</i>	Sierra marten	3.4-15 Paragraph 1, not in table



Adequacy Issue: Adequate \_\_\_\_\_ Inadequate **X** **DATA ADEQUACY WORKSHEET**

Technical Area: **Biological Resources** Project: **Fountain Wind Project**

Revision No. 1 Date 1-31-2023

Technical Staff: Carol Watson, Chris Huntley, Justin Wood, Leane Dunn, Elliot Maldonado

Project Manager: Leonidas Payne Docket: 23-OPT-01

Technical Senior: Jon Hilliard

SITING REGULATIONS	INFORMATION	AFC PAGE NUMBER AND SECTION NUMBER	ADEQUATE YES OR NO	INFORMATION REQUIRED TO MAKE AFC CONFORM WITH REGULATIONS
				<p>These species have state designations that range from S1- Critically Imperiled to S2 – Imperiled and should be evaluated in the CEQA process.</p> <p>In addition, please provide a discussion of direct, indirect, and operational impacts to the above-mentioned species, as well as provide any necessary mitigation measures to reduce project-related impacts and discuss anticipated effectiveness of the measures.</p> <p><b>Request for Information:</b> Please provide any reports or background data regarding the potential for above-mentioned special-status species to occur and identify any protective measures that would be proposed.</p> <p><b>Topic:</b> Table 3.4-3 (Special-Status Wildlife Species with Potential to Occur Within the Project Site) lists the Northern Spotted Owl (<i>Strix occidentalis caurina</i>) as having no potential to occur in the project area despite numerous positive location data on the species as verified via staff’s independent data searches (CNNDDB, etc). See Appendix B</p>

Adequacy Issue: Adequate \_\_\_\_\_ Inadequate  X  **DATA ADEQUACY WORKSHEET**

Technical Area: **Biological Resources** Project: **Fountain Wind Project**

Revision No.  1  Date  1-31-2023

Technical Staff: Carol Watson, Chris Huntley, Justin Wood, Leane Dunn, Elliot Maldonado

Project Manager: Leonidas Payne Docket: 23-OPT-01

Technical Senior: Jon Hilliard

SITING REGULATIONS	INFORMATION	AFC PAGE NUMBER AND SECTION NUMBER	ADEQUATE YES OR NO	INFORMATION REQUIRED TO MAKE AFC CONFORM WITH REGULATIONS
				<p>(g) (13) (A) (v) below for additional information on Northern spotted owl.</p> <p>In addition, the EIR does not include any direct, indirect, or operational impacts to this species, nor provide mitigation measures to reduce project related impacts. Measures should include pre-construction surveys. Further, Designated Critical Habitat for Northern Spotted Owl is located approximately 1.3 miles north of the project area and was not evaluated in the DEIR or FEIR.</p> <p><b>Request for Information:</b> Please provide any reports or background data regarding the potential for these species to occur and identify any protective measures that would be proposed. Please provide maps that show Critical Habitat for this species.</p> <p><b>Topic:</b> Table 3.4-3 (Special-Status Wildlife Species with Potential to Occur Within the Project Site) does not include ringtail (<i>Bassariscus astutus</i>) as occurring in the project area. However, this species is known from the region, suitable habitat is present, and it is known from the Shasta Trinity National Forest. In addition, the EIR does not</p>

Adequacy Issue: Adequate \_\_\_\_\_ Inadequate **X** **DATA ADEQUACY WORKSHEET**  
 Technical Area: **Biological Resources** Project: **Fountain Wind Project**

Revision No. 1 Date 1-31-2023  
 Technical Staff: Carol Watson, Chris Huntley, Justin Wood, Leane Dunn, Elliot Maldonado  
 Technical Senior: Jon Hilliard

Project Manager: Leonidas Payne Docket: 23-OPT-01

SITING REGULATIONS	INFORMATION	AFC PAGE NUMBER AND SECTION NUMBER	ADEQUATE YES OR NO	INFORMATION REQUIRED TO MAKE AFC CONFORM WITH REGULATIONS		
				<p>include any direct, indirect, or operational impacts to this species nor does it provide mitigation measures to reduce project related impacts.</p> <p><b>Request for Information:</b> Please provide any reports or background data regarding the potential for these species to occur and identify any protective measures that would be proposed.</p> <p><b>Topic:</b> 3.4.3.2 Direct and Indirect Effects of the Project, Impact 3.4-1 Construction of the Project could, unless mitigated, cause a significant impact to special-status plant species.</p> <p>The document does not adequately evaluate several sensitive plant species that have the potential to occur in the project area (See Appendix B (g) (13) (A) (v) below for additional details).</p> <p>A review of existing databases including iNaturalist identified 33 plants not addressed in the DEIR. These include:</p> <table border="1" data-bbox="1434 1295 2041 1357"> <tr> <td><i>Adiantum shastense</i></td> <td>Shasta maidenhair fern</td> </tr> </table>	<i>Adiantum shastense</i>	Shasta maidenhair fern
<i>Adiantum shastense</i>	Shasta maidenhair fern					

Adequacy Issue: Adequate \_\_\_\_\_ Inadequate **X** **DATA ADEQUACY WORKSHEET**  
 Technical Area: **Biological Resources** Project: **Fountain Wind Project**

Revision No. 1 Date 1-31-2023  
 Technical Staff: Carol Watson, Chris Huntley, Justin Wood, Leane Dunn, Elliot Maldonado  
 Technical Senior: Jon Hilliard

Project Manager: Leonidas Payne Docket: 23-OPT-01

SITING REGULATIONS	INFORMATION	AFC PAGE NUMBER AND SECTION NUMBER	ADEQUATE YES OR NO	INFORMATION REQUIRED TO MAKE AFC CONFORM WITH REGULATIONS	
				<i>Allium sanbornii</i> var. <i>sanbornii</i>	Sanborn's onion
				<i>Arctostaphylos malloryi</i>	Mallory's manzanita
				<i>Astragalus inversus</i>	Susanville milk-vetch
				<i>Brodiaea coronariarosea</i>	Indian Valley Brodiaea
				<i>Calochortus uniflorus</i>	pink star-tulip
				<i>Cardamine bellidifolia</i> var. <i>pachyphylla</i>	fleshy toothwort
				<i>Crataegus castlegarensis</i>	Castlegar hawthorne
				<i>Cypripedium montanum</i>	mountain lady's-slipper
				<i>Diplacus pygmaeus</i>	Egg Lake monkeyflower
				<i>Erigeron inornatus</i> var. <i>calidipetris</i>	hot rock daisy

Adequacy Issue: Adequate \_\_\_\_\_ Inadequate **X** **DATA ADEQUACY WORKSHEET**  
 Technical Area: **Biological Resources** Project: **Fountain Wind Project**

Revision No. 1 Date 1-31-2023  
 Technical Staff: Carol Watson, Chris Huntley, Justin Wood, Leane Dunn, Elliot Maldonado  
 Technical Senior: Jon Hilliard

Project Manager: Leonidas Payne Docket: 23-OPT-01

SITING REGULATIONS	INFORMATION	AFC PAGE NUMBER AND SECTION NUMBER	ADEQUATE YES OR NO	INFORMATION REQUIRED TO MAKE AFC CONFORM WITH REGULATIONS	
				<i>Eriophorum gracile</i>	slender cottongrass
				<i>Erythranthe inflatula</i>	ephemeral monkeyflower
				<i>Erythronium klamathense</i>	Klamath fawn lily
				<i>Helianthella californica</i>	California dwarf sunflower
				<i>Hesperocyparis bakeri</i>	Baker cypress
				<i>Leptosiphon rattanii</i>	Rattan's leptosiphon
				<i>Lewisia kelloggii</i> ssp. <i>hutchisonii</i>	Hutchison's lewisia
				<i>Limnanthes floccosa</i> ssp. <i>floccosa</i>	woolly meadowfoam
				<i>Lycopus uniflorus</i>	northern bugleweed
				<i>Navarretia subuligera</i>	awl-leaved navarretia

Adequacy Issue: Adequate \_\_\_\_\_ Inadequate **X** **DATA ADEQUACY WORKSHEET**  
 Technical Area: **Biological Resources** Project: **Fountain Wind Project**

Revision No. 1 Date 1-31-2023  
 Technical Staff: Carol Watson, Chris Huntley, Justin Wood, Leane Dunn, Elliot Maldonado  
 Technical Senior: Jon Hilliard

Project Manager: Leonidas Payne Docket: 23-OPT-01

SITING REGULATIONS	INFORMATION	AFC PAGE NUMBER AND SECTION NUMBER	ADEQUATE YES OR NO	INFORMATION REQUIRED TO MAKE AFC CONFORM WITH REGULATIONS	
				<i>Penstemon cinicola</i>	ash beardtongue
				<i>Penstemon heterodoxus var. shastensis</i>	Shasta beardtongue
				<i>Pinus coulteri</i>	Coulter pine
				<i>Piperia colemanii</i>	Coleman's rein orchid
				<i>Polygonum bidwelliae</i>	Bidwell's knotweed
				<i>Sidalcea celata</i>	Redding checkerbloom
				<i>Sidalcea gigantea</i>	giant checkerbloom
				<i>Streptanthus longisiliquus</i>	long-fruit jewelflower
				<i>Taxus brevifolia</i>	Pacific yew
				<i>Triteleia crocea var. crocea</i>	yellow triteleia
				<i>Utricularia minor</i>	lesser bladderwort

Adequacy Issue: Adequate \_\_\_\_\_ Inadequate **X** **DATA ADEQUACY WORKSHEET**  
 Technical Area: **Biological Resources** Project: **Fountain Wind Project**

Revision No. 1 Date 1-31-2023  
 Technical Staff: Carol Watson, Chris Huntley, Justin Wood, Leane Dunn, Elliot Maldonado  
 Technical Senior: Jon Hilliard

Project Manager: Leonidas Payne Docket: 23-OPT-01

SITING REGULATIONS	INFORMATION	AFC PAGE NUMBER AND SECTION NUMBER	ADEQUATE YES OR NO	INFORMATION REQUIRED TO MAKE AFC CONFORM WITH REGULATIONS			
				<table border="1" data-bbox="1434 570 2022 670"> <tr> <td data-bbox="1434 570 1745 670"><i>Wakerobin trillium ovatum oettingeri</i></td> <td data-bbox="1745 570 2022 670">Salmon mountains wakerobin</td> </tr> </table> <p data-bbox="1434 708 2022 862">Additionally, there is a likelihood that the first species listed, Shasta maidenhair fern (<i>Adiantum shastense</i>), may occur in the project area, as it has been detected in close proximity to the project.</p> <p data-bbox="1434 899 2022 995">Table 3 of the Fountain Site Characteristic Study (TN # 24318) included additional plants and wildlife not fully evaluated in the DEIR.</p> <p data-bbox="1434 1032 2022 1179">In addition, the EIR does not include any direct, indirect, or operational impacts to these species nor does it provide adequate mitigation measures to reduce project related impacts. Measures should include pre-construction surveys.</p> <p data-bbox="1434 1216 2022 1424"><b>Request for Information:</b> An updated rare plant survey of the entire project area should be completed, and the results of this survey shall be provided in an updated rare plant survey report. The surveys should not be deferred to preconstruction surveys alone for areas not surveyed within five years.</p>		<i>Wakerobin trillium ovatum oettingeri</i>	Salmon mountains wakerobin
<i>Wakerobin trillium ovatum oettingeri</i>	Salmon mountains wakerobin						

Adequacy Issue: Adequate \_\_\_\_\_ Inadequate **X** **DATA ADEQUACY WORKSHEET**

Technical Area: **Biological Resources** Project: **Fountain Wind Project**

Revision No. 1 Date 1-31-2023

Technical Staff: Carol Watson, Chris Huntley, Justin Wood, Leane Dunn, Elliot Maldonado

Project Manager: Leonidas Payne Docket: 23-OPT-01

Technical Senior: Jon Hilliard

SITING REGULATIONS	INFORMATION	AFC PAGE NUMBER AND SECTION NUMBER	ADEQUATE YES OR NO	INFORMATION REQUIRED TO MAKE AFC CONFORM WITH REGULATIONS
				<p><b>Topic:</b> Impact 3.4-5: Construction, operation and decommissioning of the Project could result in adverse impacts to California spotted owls.</p> <p>The DEIR does not adequately assess potential impacts to this species nor does the proposed mitigation measure provide adequate protection during proposed construction activities. The DEIR states "Areas of the Project Site containing moderate to high suitability for nesting habitat are present only within the southeastern third of the Project Site, with approximately 945 acres classified as having moderate suitability for the species and 50 acres classified as having high suitability. These areas of predicted high suitability for nesting and roosting, are present in small, isolated patches in the Project Site which may limit the potential for these areas to support California spotted owl roosts or nests."</p> <p>Considering the loss of any suitable habitat for this and other species in the region that has occurred from recent landscape level wildfires, the DEIR should not discount use of the site nor its importance to this species in the region. In addition, the current mitigation measure indicates that one survey for this species would be</p>



Adequacy Issue: Adequate \_\_\_\_\_ Inadequate **X** **DATA ADEQUACY WORKSHEET**

Technical Area: **Biological Resources** Project: **Fountain Wind Project**

Revision No. 1 Date 1-31-2023

Technical Staff: Carol Watson, Chris Huntley, Justin Wood, Leane Dunn, Elliot Maldonado

Project Manager: Leonidas Payne Docket: 23-OPT-01

Technical Senior: Jon Hilliard

SITING REGULATIONS	INFORMATION	AFC PAGE NUMBER AND SECTION NUMBER	ADEQUATE YES OR NO	INFORMATION REQUIRED TO MAKE AFC CONFORM WITH REGULATIONS
				<p>conducted or presence would be assumed. Conducting one surveys season would not likely ensure that impacts to this species are assessed or reduced to less than significant levels.</p> <p><b>Required Information:</b> Please provide updated information on occurrences of spotted owl within and near the Project site.</p> <p><b>Topic:</b> Impact 3.4-12: Site preparation and construction, operations, and maintenance, and decommissioning and site restoration of the Project could result in habitat loss and water quality impacts on Pit roach, special-status amphibians and western pond turtle.</p> <p>The EIR does not include specific measures with clear methods to identify and protect areas supporting these species. The document does not discuss potential barriers to upstream passage from culverts or crossings, overwintering sites, egg deposition areas, or provide an analysis of potential impacts to these resources. It is also unclear which areas were specifically surveyed for amphibians. Was only modeled habitat searched, moderate and High, or all potential habitat?</p>

Adequacy Issue: Adequate \_\_\_\_\_ Inadequate **X** **DATA ADEQUACY WORKSHEET**

Technical Area: **Biological Resources** Project: **Fountain Wind Project**

Revision No. 1 Date 1-31-2023

Technical Staff: Carol Watson, Chris Huntley, Justin Wood, Leane Dunn, Elliot Maldonado

Project Manager: Leonidas Payne Docket: 23-OPT-01

Technical Senior: Jon Hilliard

SITING REGULATIONS	INFORMATION	AFC PAGE NUMBER AND SECTION NUMBER	ADEQUATE YES OR NO	INFORMATION REQUIRED TO MAKE AFC CONFORM WITH REGULATIONS
				<p><b>Request for Information:</b> Please provide any reports or background data regarding the potential for these species to occur and identify any protective measures that would be proposed. Please clarify if all potential habitat for amphibians was searched vs, moderate and High, or all potential habitat. Please provide analysis of the potential direct, indirect, and operational impacts to these species.</p> <p><b>Topic:</b> Impact 3.4-13: Operation and maintenance of the Project could result in direct mortality and injury to bats, including special-status species. The DEIR does not evaluate construction impacts to bats, their roosts or potential hibernaculum. There is no mitigation measures that specifically address construction related impacts to bats.</p> <p><b>Request for Information:</b> Please provide information on the number and type of cavities, and other habitat features that occur in the Project area that could be used by bats.</p> <p><b>Topic:</b> Impact 3.4-14: Site Preparation and Construction and Decommissioning and Site Restoration of the Project could result in temporary adverse impacts to special-status</p>

Adequacy Issue: Adequate \_\_\_\_\_ Inadequate **X** **DATA ADEQUACY WORKSHEET**

Technical Area: **Biological Resources** Project: **Fountain Wind Project**

Revision No. 1 Date 1-31-2023

Technical Staff: Carol Watson, Chris Huntley, Justin Wood, Leane Dunn, Elliot Maldonado

Project Manager: Leonidas Payne Docket: 23-OPT-01

Technical Senior: Jon Hilliard

SITING REGULATIONS	INFORMATION	AFC PAGE NUMBER AND SECTION NUMBER	ADEQUATE YES OR NO	INFORMATION REQUIRED TO MAKE AFC CONFORM WITH REGULATIONS
				<p>mammals.</p> <p>The DEIR concludes that impacts to special status mammals would be less than significant because of current land management practices. However, it is likely that some of these and other mammals could be directly impacted by construction of the project. Staff considers these impacts significant absent mitigation. In addition, the current mitigation measure if adopted does not provide the specific actions required to ensure the protection of Fisher and other sensitive mammals.</p> <p><b>Request for Information:</b> Please provide information on the number and the type of cavities, and other habitat features (brush or rock piles, downed logs, etc.) that occur in the Project area that could be used by fishers.</p> <p><b>Topic:</b> Impact Analysis General Overview. The document does not appear to contain impact analysis to wildlife from the spread of noxious or invasive weeds, project related wildfires, blasting, use of herbicides, disturbance to denning or natal sites, use of brush piles and other features periodically occupied by Fishers, introduction of</p>

Adequacy Issue: Adequate \_\_\_\_\_ Inadequate **X** **DATA ADEQUACY WORKSHEET**

Technical Area: **Biological Resources** Project: **Fountain Wind Project**

Revision No. 1 Date 1-31-2023

Technical Staff: Carol Watson, Chris Huntley, Justin Wood, Leane Dunn, Elliot Maldonado

Project Manager: Leonidas Payne Dock et: 23-OPT-01

Technical Senior: Jon Hilliard

<b>SITING REGULATIONS</b>	<b>INFORMATION</b>	<b>AFC PAGE NUMBER AND SECTION NUMBER</b>	<b>ADEQUATE YES OR NO</b>	<b>INFORMATION REQUIRED TO MAKE AFC CONFORM WITH REGULATIONS</b>
				<p>invasive wildlife species (mussels and gastropods), and general exposure to hazardous materials. Although there is limited language regarding weeds and invasive species identified within the riparian and waters impact sections. In addition, the FEIR does not include specific language on a Nesting Bird Management Plan, Invasive Species Management, Bird and Bat Conservation Strategies), avoidance of wetland areas, etc.</p> <p><b>Request for Information:</b> Please provide information on the number and type of snags, cavities, and other habitat features that occur in the Project area and a 500-foot buffer. Please provide an analysis of impacts to all species that have the potential to occur in the proposed project area. Please clarify impacts from what types of invasive species and their distribution on the region.</p> <p>If herbicides would be used, the document should contain a specific section describing the direct, indirect, and operational impacts to these species.</p>
Appendix B (g) (13) (A)	A regional overview and discussion of terrestrial and aquatic biological resources, with particular attention to sensitive biological		No	Please reference Appendix B (g) (1) and Appendix B

Adequacy Issue: Adequate \_\_\_\_\_ Inadequate **X** **DATA ADEQUACY WORKSHEET**  
 Technical Area: **Biological Resources** Project: **Fountain Wind Project**

Revision No. 1 Date 1-31-2023  
 Technical Staff: Carol Watson, Chris Huntley, Justin Wood, Leane Dunn, Elliot Maldonado  
 Technical Senior: Jon Hilliard

Project Manager: Leonidas Payne Docket: 23-OPT-01

SITING REGULATIONS	INFORMATION	AFC PAGE NUMBER AND SECTION NUMBER	ADEQUATE YES OR NO	INFORMATION REQUIRED TO MAKE AFC CONFORM WITH REGULATIONS
	resources within 10 miles of the project. Include a map at a scale of 1:100,000 (or other suitable scale) showing sensitive biological resource location(s) in relation to the project site and related facilities and any boundaries of a local Habitat Conservation Plan or similar open space land use plan or designation. Sensitive biological resources include:			(g) (13) (A) (v) for a discussion of resources defined in the California Code of Regulations, title 20, sections 1201(d) and (u) that is deficient or missing.
Appendix B (g) (13) (A) (i)	species listed under state or federal Endangered Species Acts;		No	Please reference Appendix B (g) (1) and Appendix B (g) (13) (A) (v) for a discussion listed species information that is deficient or missing.
Appendix B (g) (13) (A) (ii)	resources defined in the California Code of Regulations, title 20, sections 1201(d) and (u);		No	Please reference Appendix B (g) (1) and Appendix B (g) (13) (A) (v) for a discussion of resources defined in the California Code of Regulations, title 20, sections 1201(d) and (u) that is deficient or missing.
Appendix B (g) (13) (A) (iii)	species identified as state Fully Protected;		No	Please reference Appendix B (g) (1) and Appendix B (g) (13) (A) (v) for a discussion of fully protected species information that is deficient or missing.
Appendix B (g) (13) (A) (iv)	species covered by Migratory Bird Treaty Act;		No	Please reference Appendix B (g) (1) and Appendix B

Adequacy Issue: Adequate \_\_\_\_\_ Inadequate **X** **DATA ADEQUACY WORKSHEET**  
 Technical Area: **Biological Resources** Project: **Fountain Wind Project**

Revision No. 1 Date 1-31-2023  
 Technical Staff: Carol Watson, Chris Huntley, Justin Wood, Leane Dunn, Elliot Maldonado  
 Technical Senior: Jon Hilliard

Project Manager: Leonidas Payne Dock et: 23-OPT-01

SITING REGULATIONS	INFORMATION	AFC PAGE NUMBER AND SECTION NUMBER	ADEQUATE YES OR NO	INFORMATION REQUIRED TO MAKE AFC CONFORM WITH REGULATIONS
				(g) (13) (A) (v) for a discussion of resources defined in the California Code of Regulations, title 20, sections 1201(d) and (u) that is deficient or missing.
f	species and habitats identified by local, state, and federal agencies as needing protection, including but not limited to those identified by the California Natural Diversity Database, or where applicable, in Local Coastal Programs or in relevant decisions of the California Coastal Commission; and	Plants: TN 248308-7, Appendices A, C, and D TN 248308-8, Appendices A and C TN 248308-1, Appendices A and C TN 248329-4, Table C-1 TN 248308-7, Page 2 TN 248308-8, Pages 2-3 TN 248308-1, Page 5 Wildlife: TN #: 248306-2 (2019 nest surveys, pg 1-2.) TN #: 248309-5 (2018 avian use study, Figure 5, pg. ii, 11-12.) TN#: 248318 (Site characterization study (2017), Methods, pg. 8) TN#: 248318 (Site characterization study (2017))	No	<b>Topic:</b> A special-status plant, <i>Carex comosa</i> (CRPR 2B.1) was identified as being present on the project site twice in TN 248308-7, Appendices B and C but not further discussed in the EIR. Additionally, special-status plant, <i>Sidalcea gigantea</i> (CRPR 4.3), was noted as present in TN 248329-4, Table C-1 and not discussed in the EIR. Additionally, special-status plant, <i>Cardamine bellidifolia</i> var. <i>pachyphylla</i> (CRPR 4.3), is known from the project site was not addressed in the reports. Lastly, several genera with special-status species known from the region were not identified to species level as required in the CDFW protocol (CDFW, 2018). These include the following genera with the special-status species noted for each, <i>Carex</i> sp. [ <i>Carex lasiocarpa</i> (CRPR 2B.3)], <i>Castilleja</i> sp. [ <i>Castilleja lassenensis</i> (CRPR 1B.3)], <i>Eriogonum umbellatum</i> [ <i>Eriogonum umbellatum</i> var. <i>humistratum</i> (CRPR 4.3)], <i>Eriogonum</i> sp. [ <i>Eriogonum ursinum</i> var. <i>erubescens</i> (CRPR 1B.3)], <i>Penstemon</i> sp. [ <i>Penstemon heterodoxus</i> var. <i>shastensis</i> (CRPR 4.3)], and <i>Silene</i> sp.

Adequacy Issue: Adequate \_\_\_\_\_ Inadequate **X** **DATA ADEQUACY WORKSHEET**

Technical Area: **Biological Resources** Project: **Fountain Wind Project**

Revision No. 1 Date 1-31-2023

Technical Staff: Carol Watson, Chris Huntley, Justin Wood, Leane Dunn, Elliot Maldonado

Project Manager: Leonidas Payne Dock et: 23-OPT-01

Technical Senior: Jon Hilliard

SITING REGULATIONS	INFORMATION	AFC PAGE NUMBER AND SECTION NUMBER	ADEQUATE YES OR NO	INFORMATION REQUIRED TO MAKE AFC CONFORM WITH REGULATIONS
		<p>TN #: 248308-5 (2018 great gray owl habitat assessment, pg. 1, 2)</p> <p>TN #: 248308-5 (2018 great gray owl habitat assessment, pg. 2, Figure 1)</p> <p>TN #: 248308-5 (2018 great gray owl habitat assessment, pg. 3 and Figure 1)</p> <p>TN #: 248308-5 (2018 great gray owl habitat assessment, pg. 3 and Figure 1)</p> <p>site characterization study (2017), Figure 5)</p> <p>TN #: 248306-4 (2018 northern goshawk surveys, pg. 1 and 2)</p> <p>TN #: 248307-5 (spotted owl risk assessment [2020], pg. 4 and 6)</p> <p>TN #: 248309-4 (2021 spotted owl memo)</p> <p>TN # 248289-1 (FEIR Page 1-5 to 1-6)</p> <p>TN # 248306-1 (Willow Flycatcher Surveys)</p>		<p>[<i>Silene occidentalis</i> ssp. <i>longistipitata</i> (CRPR 1B.2)].</p> <p>It should also be noted that <i>Meesia uliginosa</i> (CRPR 2B.2) is known from the region and no non-vascular plant surveys were conducted. Because of the potential for this special-status bryophyte to be present, focused surveys for this species should have been conducted.</p> <p>Although CEQA analyses for plants ranked with CRPR 4 are not as clear-cut as higher priority species, recent guidelines for determining which CRPR 4 taxa should be evaluated under CEQA (CNPS, 2020) should be reviewed and all CRPR 4 taxa should be presented in the rare plant survey reports for possible analysis in the CEQA document.</p> <p>The documents appear to leave out or mis-identify some plant species. As noted above several species were not identified to an appropriate level and the comprehensive plant species list needs to be updated. In addition, significant discrepancies were observed between the species list presented in the three rare plant survey reports and the jurisdictional delineation report. Approximately 76</p>

Adequacy Issue: Adequate \_\_\_\_\_ Inadequate **X** **DATA ADEQUACY WORKSHEET**

Technical Area: **Biological Resources** Project: **Fountain Wind Project**

Revision No. 1 Date 1-31-2023

Technical Staff: Carol Watson, Chris Huntley, Justin Wood, Leane Dunn, Elliot Maldonado

Project Manager: Leonidas Payne Docket: 23-OPT-01

Technical Senior: Jon Hilliard

SITING REGULATIONS	INFORMATION	AFC PAGE NUMBER AND SECTION NUMBER	ADEQUATE YES OR NO	INFORMATION REQUIRED TO MAKE AFC CONFORM WITH REGULATIONS
				<p>additional plant species were noted in the jurisdictional delineation report that were not included in the other reports.</p> <p>The rare plant survey reports do not clearly define the botanical survey area. It is unclear whether surveys were limited to direct impact areas or whether they also included an indirect impact area.</p> <p>Additionally, although the rare plant survey reports state that the surveys followed the CDFW protocol (CDFW, 2018), several discrepancies were identified including the following:</p> <ul style="list-style-type: none"> <li>• Reference sites were not visited for any of the special-status species with a potential to be present.</li> <li>• Precipitation in 2018 and 2021 were below average (60% and 63% of average, respectively). These lower-than-average rainfall values may have prevented annuals or short-lived plants from being present or detectable on the project site. Without reference site visits, the survey results from these two years are inadequate.</li> </ul>



Adequacy Issue: Adequate \_\_\_\_\_ Inadequate **X** **DATA ADEQUACY WORKSHEET**

Technical Area: **Biological Resources** Project: **Fountain Wind Project**

Revision No. 1 Date 1-31-2023

Technical Staff: Carol Watson, Chris Huntley, Justin Wood, Leane Dunn, Elliot Maldonado

Project Manager: Leonidas Payne

Docket: 23-OPT-01

Technical Senior: Jon Hilliard

SITING REGULATIONS	INFORMATION	AFC PAGE NUMBER AND SECTION NUMBER	ADEQUATE YES OR NO	INFORMATION REQUIRED TO MAKE AFC CONFORM WITH REGULATIONS
				<p>Voucher collections were not obtained from the project site which makes it difficult to confirm the identification of species detected. Voucher specimens are recommended because they provide verifiable documentation of species presence and identification and a scientific record.</p> <p><b>Required Information:</b> An updated rare plant survey of the entire project area should be completed, and the results of this survey shall be provided in an updated rare plant survey report. Specially this revised report should address the following:</p> <ul style="list-style-type: none"> <li>• A discussion of <i>Carex comosa</i>, <i>Sidalcea gigantea</i>, <i>Cardamine bellidifolia</i> var. <i>pachyphylla</i>, and <i>Meesia uliginosa</i>.</li> <li>• The results of focused non-vascular plant surveys by a qualified botanist.</li> <li>• A discussion of all CRPR 4 species identified in the literature search and observed on the site.</li> </ul> <p>All species in the species list with a potential to be special status shall be identified to the appropriate taxonomic level. The updated rare plant survey and rare plant survey report should be completed</p>

Adequacy Issue: Adequate \_\_\_\_\_ Inadequate **X** **DATA ADEQUACY WORKSHEET**

Technical Area: **Biological Resources** Project: **Fountain Wind Project**

Revision No. 1 Date 1-31-2023

Technical Staff: Carol Watson, Chris Huntley, Justin Wood, Leane Dunn, Elliot Maldonado

Project Manager: Leonidas Payne Docket: 23-OPT-01

Technical Senior: Jon Hilliard

SITING REGULATIONS	INFORMATION	AFC PAGE NUMBER AND SECTION NUMBER	ADEQUATE YES OR NO	INFORMATION REQUIRED TO MAKE AFC CONFORM WITH REGULATIONS
				<p>according to the CDFW protocol and should cover all impact areas and an indirect impact buffer area. Any exceptions to the CDFW protocol should be clearly stated and explained.</p> <p>A comprehensive species list should be provided in the updated rare plant survey report and should discuss any discrepancies between the previous rare plant reports and other technical reports for the project (i.e., jurisdictional delineation).</p> <p><b>Topic:</b> In the 2019 Raptor Nest Survey Report, the introduction states, “In 2018, due to concerns raised by CDFW regarding the need for an Memorandum of Understanding (MOU) to conduct aerial surveys for eagles, WEST conducted eagle nest surveys from the Ground (WEST 2018b)” and “In 2019, following receipt of an interim MOU from CDFW, WEST conducted a third year of aerial surveys for eagles and other raptors.....The following memorandum provides a summary of the methods and results of the 2019 survey effort, as well as a summary of nest status from 2017 and 2018 surveys.”</p> <p><b>Required Information:</b> Please provide a copy of the MOU from CDFW.</p>

Adequacy Issue: Adequate \_\_\_\_\_ Inadequate **X** **DATA ADEQUACY WORKSHEET**

Technical Area: **Biological Resources** Project: **Fountain Wind Project**

Revision No. 1 Date 1-31-2023

Technical Staff: Carol Watson, Chris Huntley, Justin Wood, Leane Dunn, Elliot Maldonado

Project Manager: Leonidas Payne Dock et: 23-OPT-01

Technical Senior: Jon Hilliard

SITING REGULATIONS	INFORMATION	AFC PAGE NUMBER AND SECTION NUMBER	ADEQUATE YES OR NO	INFORMATION REQUIRED TO MAKE AFC CONFORM WITH REGULATIONS
				<p><b>Topic:</b> The Hatchet Ridge Avian Mortality Memo discusses avian mortality at the Hatchet Ridge Wind Energy Facility. More recent and comprehensive data would be useful in analyzing potential impacts to birds and bat species.</p> <p><b>Required Information:</b> Please provide updated mortality data from the Hatchet Ridge Wind Farm.</p> <p><b>Topic:</b> The memo states, “Environmental resources within the Project Area and surrounding Evaluation Area were examined through a search of existing publicly available data and an initial reconnaissance-level site visit. The initial site visit occurred October 19–21, 2016 and entailed a preliminary examination of the area from accessible public and private roads. Biological features and potential wildlife habitat surveyed during the site visit included plant communities, topographic and geological features, potential raptor nesting habitat, habitat for prey populations, and potential bat roosting and foraging habitat. <u>However, due to the relatively late seasonal timing of the site visit, little information was gathered on plant communities.</u>”</p>

Adequacy Issue: Adequate \_\_\_\_\_ Inadequate **X** **DATA ADEQUACY WORKSHEET**

Technical Area: **Biological Resources** Project: **Fountain Wind Project**

Revision No. 1 Date 1-31-2023

Technical Staff: Carol Watson, Chris Huntley, Justin Wood, Leane Dunn, Elliot Maldonado

Project Manager: Leonidas Payne Docket: 23-OPT-01

Technical Senior: Jon Hilliard

SITING REGULATIONS	INFORMATION	AFC PAGE NUMBER AND SECTION NUMBER	ADEQUATE YES OR NO	INFORMATION REQUIRED TO MAKE AFC CONFORM WITH REGULATIONS
				<p><b>Required Information:</b> Please provide information on whether additional surveys were conducted to characterize vegetation communities within the Project area, if information on specific habitat features was gathered, and clarify if the applicable species habitat assessments and field surveys addressed that information.</p> <p><b>Topic:</b> Figure 5. Land Cover in the Site Characterization Study is blurry and difficult to interpret. Given the size of the Project area, multiple maps zoomed into various parts of the project would have been easier to understand. The land cover types were determined by NLCD, and do not correspond with vegetation communities described elsewhere in the document. For instance, the study states that, “the dominant vegetation community within the Project is Sierran mixed conifer forest”; the legend has “mixed forest”, “evergreen forest,” and “deciduous forest.” No descriptions of the land cover types were provided to understand the difference in structures between these forest cover types, or how they correspond to Sierran mixed conifer forest. “Herbaceous” is misspelled in the legend.</p> <p><b>Required Information:</b> Please provide information on whether additional surveys were conducted to</p>

Adequacy Issue: Adequate \_\_\_\_\_ Inadequate **X** **DATA ADEQUACY WORKSHEET**

Technical Area: **Biological Resources** Project: **Fountain Wind Project**

Revision No. 1 Date 1-31-2023

Technical Staff: Carol Watson, Chris Huntley, Justin Wood, Leane Dunn, Elliot Maldonado

Project Manager: Leonidas Payne Docket: 23-OPT-01

Technical Senior: Jon Hilliard

SITING REGULATIONS	INFORMATION	AFC PAGE NUMBER AND SECTION NUMBER	ADEQUATE YES OR NO	INFORMATION REQUIRED TO MAKE AFC CONFORM WITH REGULATIONS
				<p>characterize vegetation communities within the Project area, if information on specific habitat features was gathered, and clarify if the applicable species habitat assessments and field surveys addressed that information.</p> <p><b>Topic:</b> 2018 great gray owl habitat assessment. The memo states that no confirmed detections of great gray owl have been recorded within Shasta County. While it is true that CNDDDB has no confirmed records in Shasta County, the CDFW BIOS 'Great Gray Owl' layer shows two points in Shasta County – one on the Siskiyou County border, and one in Lassen Volcanic National Park. Though these records are considered historical occurrences, they should be discussed in the report. eBird has sensitive locations shown between Redding and Shasta Lake; and at Lassen Volcanic National Park that are within the past 10 years.</p> <p><b>Required Information:</b> Please provide updated and expanded great gray owl record searches.</p> <p><b>Topic:</b> 2018 great gray owl habitat assessment. The memo states, "Geographic Information System (GIS) data from the CNDDDB and examination of aerial imagery were used to</p>

Adequacy Issue: Adequate \_\_\_\_\_ Inadequate **X** **DATA ADEQUACY WORKSHEET**  
 Technical Area: **Biological Resources** Project: **Fountain Wind Project**

Revision No. 1 Date 1-31-2023  
 Technical Staff: Carol Watson, Chris Huntley, Justin Wood, Leane Dunn, Elliot Maldonado  
 Technical Senior: Jon Hilliard

Project Manager: Leonidas Payne Docket: 23-OPT-01

SITING REGULATIONS	INFORMATION	AFC PAGE NUMBER AND SECTION NUMBER	ADEQUATE YES OR NO	INFORMATION REQUIRED TO MAKE AFC CONFORM WITH REGULATIONS
				<p>conduct a desktop review of potential great gray owl nesting and foraging habitat within the Project area using the CDFW Model (CNDDDB 2011; Figure 1).” The memo further states, “Once identified during the desktop assessment, a WEST biologist visited the Project to evaluate areas of modelled great gray owl habitat and to identify areas of potential habitat not predicted by the model.” The memo goes on to provide an evaluation of the modeled habitat within the Project Area but does not go into any detail regarding potential habitat not predicted by the model, or why other areas of the Project site were determined to not provide potential habitat. There was no discussion regarding the presence or absence of nesting habitat features within the project area, such as abandoned stick nests, broken-topped snags, or tree cavities.</p> <p><b>Required Information:</b> Please provide additional information on whether field surveys were conducted to determine habitat characteristics for this species.</p> <p><b>Topic: Great Gray Owl.</b> The results of the survey state that “no specific measurements of tree size or canopy closure were taken within the area of modeled habitat” and the field assessment was</p>

Adequacy Issue: Adequate \_\_\_\_\_ Inadequate **X** **DATA ADEQUACY WORKSHEET**

Technical Area: **Biological Resources** Project: **Fountain Wind Project**

Revision No. 1 Date 1-31-2023

Technical Staff: Carol Watson, Chris Huntley, Justin Wood, Leane Dunn, Elliot Maldonado

Project Manager: Leonidas Payne Docket: 23-OPT-01

Technical Senior: Jon Hilliard

SITING REGULATIONS	INFORMATION	AFC PAGE NUMBER AND SECTION NUMBER	ADEQUATE YES OR NO	INFORMATION REQUIRED TO MAKE AFC CONFORM WITH REGULATIONS
				<p>“limited to a view of the modeled nesting habitat from the fence located on the west side of the meadow and an assessment of tree sizes in close proximity.” The location of the fence, the relation of the fence to the modeled habitat, and trees in “close proximity” are not defined. It is also not clear if habitat surrounding the modeled habitat was assessed. The analysis habitat was limited to the size of the modeled habitat area and nearby aerial imagery comparison.</p> <p>The results go on to state that “the desktop review of aerial imagery and habitat classifications determined that the area of modeled nesting habitat within the Project area does not meet the minimum criteria for suitability, which was confirmed during the field assessment.” This statement is unclear given that the site was on “a private inholding” and field assessment was limited to a view from a fence line and aerial imagery comparison.</p> <p><b>Required Information:</b> Please provide additional information on how the habitat in the private inholding was determined.</p> <p><b>Topic:</b> Vegetation in the “private inholding” is described as having a large meadow/pasture</p>

Adequacy Issue: Adequate \_\_\_\_\_ Inadequate **X** **DATA ADEQUACY WORKSHEET**

Technical Area: **Biological Resources** Project: **Fountain Wind Project**

Revision No. 1 Date 1-31-2023

Technical Staff: Carol Watson, Chris Huntley, Justin Wood, Leane Dunn, Elliot Maldonado

Project Manager: Leonidas Payne Docket: 23-OPT-01

Technical Senior: Jon Hilliard

SITING REGULATIONS	INFORMATION	AFC PAGE NUMBER AND SECTION NUMBER	ADEQUATE YES OR NO	INFORMATION REQUIRED TO MAKE AFC CONFORM WITH REGULATIONS
				<p>surrounded by conifers. In the site characterization report, this same area appears to be identified as cultivated crops, shrub/scrub and evergreen forest.</p> <p><b>Required Information:</b> The data on the habitat descriptions of the project are not consistent throughout the memos. Please provide specific information on the vegetation communities on the project and whether they provide habitat for species with potential to occur in the area.</p> <p><b>Topic:</b> The Introduction paragraph discusses surveys conducted by timberland owners, and previous surveys in timber harvest plans. Data from these two sources were not discussed in other bird memos and survey results. The memo states that "...surveys for goshawk were conducted in 2018 to provide a more current assessment of potential presence of active nests within the four historical occurrence areas." The memo also states, "Based on reviews of aerial imagery within the Project area, habitat within these historical occurrence areas appear to represent the most suitable nesting stands in close proximity (e.g., within 160 m) to areas of potential disturbance based on the most current Project layout as of the date of this report." Were field surveys conducted elsewhere in the Project area</p>



Adequacy Issue: Adequate \_\_\_\_\_ Inadequate **X** **DATA ADEQUACY WORKSHEET**

Technical Area: **Biological Resources** Project: **Fountain Wind Project**

Revision No. 1 Date 1-31-2023

Technical Staff: Carol Watson, Chris Huntley, Justin Wood, Leane Dunn, Elliot Maldonado

Project Manager: Leonidas Payne Docket: 23-OPT-01

Technical Senior: Jon Hilliard

SITING REGULATIONS	INFORMATION	AFC PAGE NUMBER AND SECTION NUMBER	ADEQUATE YES OR NO	INFORMATION REQUIRED TO MAKE AFC CONFORM WITH REGULATIONS
				<p>to determine if new territory boundaries had been established?</p> <p><b>Required Information:</b> Please provide available data for surveys conducted by timberland owners and THPs for all species. Please provide more detailed information on habitat assessments for goshawk in other areas of the project site, outside of known CNDDDB records.</p> <p><b>Topic:</b> The project boundary was used as the extent of evaluation of known goshawk territories. CNDDDB shows at least one territory immediately adjacent to the project boundary. Please explain why a two-mile buffer was not used to evaluate northern goshawk, similar to the 2-mile buffer used in the raptor nest surveys. The memo states that, "According to the CFPR, a minimum buffer of five to 20 acres should be maintained around active goshawk nests," which would indicate that a buffer around the project area should have been included in the analysis.</p> <p>The memo does state that surveys were focused on historical goshawk occurrence areas, and therefore the results are not broadly applicable across the Project area. Additional surveys were</p>

Adequacy Issue: Adequate \_\_\_\_\_ Inadequate **X** **DATA ADEQUACY WORKSHEET**

Technical Area: **Biological Resources** Project: **Fountain Wind Project**

Revision No. 1 Date 1-31-2023

Technical Staff: Carol Watson, Chris Huntley, Justin Wood, Leane Dunn, Elliot Maldonado

Project Manager: Leonidas Payne Docket: 23-OPT-01

Technical Senior: Jon Hilliard

SITING REGULATIONS	INFORMATION	AFC PAGE NUMBER AND SECTION NUMBER	ADEQUATE YES OR NO	INFORMATION REQUIRED TO MAKE AFC CONFORM WITH REGULATIONS
				<p>conducted in 2021 in accordance with the Shasta County EIR.</p> <p><b>Required Information:</b> Please expand the analysis of known goshawk territories to an appropriate buffer around the project area.</p> <p><b>Topic:</b> Goshawk. The results section is brief (limited to two sentences) and does not provide the applicable data associated with the conclusions.</p> <p><b>Required Information:</b> Please provide the data records associated with the acoustical survey stations.</p> <p><b>Topic:</b> The memo states that, "For purposes of owl management and conservation, the Pitt River in Shasta County is recognized as the dividing line between the CSO range to the south and the state and federally listed northern spotted owl (<i>Strix occidentalis caurina</i>; NSO) to the north (Gutiérrez and Barrowclough 2005). At its closest point, the Pitt River runs approximately 4.7 miles (mi; 7.6 kilometers [km]) north of the Project Site."</p> <p>The USFS PWS publication <i>The California Spotted Owl: Current State of Knowledge</i> (Gutiérrez et al.</p>

Adequacy Issue: Adequate \_\_\_\_\_ Inadequate **X** **DATA ADEQUACY WORKSHEET**

Technical Area: **Biological Resources** Project: **Fountain Wind Project**

Revision No. 1 Date 1-31-2023

Technical Staff: Carol Watson, Chris Huntley, Justin Wood, Leane Dunn, Elliot Maldonado

Project Manager: Leonidas Payne Dock et: 23-OPT-01

Technical Senior: Jon Hilliard

SITING REGULATIONS	INFORMATION	AFC PAGE NUMBER AND SECTION NUMBER	ADEQUATE YES OR NO	INFORMATION REQUIRED TO MAKE AFC CONFORM WITH REGULATIONS
				<p>2017  <a href="https://www.fs.usda.gov/psw/publications/documents/psw_gtr254/">https://www.fs.usda.gov/psw/publications/documents/psw_gtr254/</a>), Figure 2-1 shows Shasta, Lassen and parts of Modoc Co as the transition zone between Northern and California spotted owl. The PSW states, "Indeed, introgression between northern and California spotted owls occurs and there is a cline of overlap in northeastern California near the Pit River (Barrowclough et al. 2011; fig. 2-1). For purposes of owl management and conservation, the Pit River is recommended as the management dividing line between the northern and the California subspecies (Gutiérrez and Barrowclough 2005). Thus, the Hat Creek Ranger District of the Lassen National Forest is that unit of U.S. Forest Service managed land where the transition of the northern and California subspecies occurs (fig. 2-1)." Though the Pit River is the line for NSO management, there are numerous occurrences of NSO south of Pit River on the CDFW BIOS Spotted Owl Observations Layer. The report itself, in the Risk Assessment section, states that the area is the transition zone between CSO and NSO subspecies ranges.</p> <p>There is final critical habitat for NSO approximately 2 miles north of the project area. Observations of NSO are located north and south of CA-299 E.</p>

Adequacy Issue: Adequate \_\_\_\_\_ Inadequate **X** **DATA ADEQUACY WORKSHEET**

Technical Area: **Biological Resources** Project: **Fountain Wind Project**

Revision No. 1 Date 1-31-2023

Technical Staff: Carol Watson, Chris Huntley, Justin Wood, Leane Dunn, Elliot Maldonado

Project Manager: Leonidas Payne

Docket: 23-OPT-01

Technical Senior: Jon Hilliard

SITING REGULATIONS	INFORMATION	AFC PAGE NUMBER AND SECTION NUMBER	ADEQUATE YES OR NO	INFORMATION REQUIRED TO MAKE AFC CONFORM WITH REGULATIONS
				<p><b>Required Information:</b> The current data available does not support the conclusion that the site does not provide habitat for federal listed northern spotted owl. Please provide an updated habitat assessment for the northern spotted owl including appropriate information that supports the conclusion that evaluation for federal listed NSO is not appropriate. The results of the memo should indicate whether NSO surveys are warranted, whether the project intends to assume presence, and if presence is assumed or NSO are detected, the process for consultation under the federal endangered species act (FESA).</p> <p><b>Topic:</b> The report describes the Historical Occurrence in the Project Site Vicinity, describing the following activity centers: SHA0046, SHA0051, SHA0124, and SHA0063. The report states, "The last known positive detections associated with SHA0046 and SHA0051 were individual birds observed in 1994 and 1990, respectively (CDFW 2020b). The last known active nest at SHA0046 was documented in 1992, when a female CSO was observed with two young.....The most recent positive detection near the Project (SHA0124) was an incidental observation of an adult bird with two young reported by a Sierra Pacific Industries</p>

Adequacy Issue: Adequate \_\_\_\_\_ Inadequate **X** **DATA ADEQUACY WORKSHEET**  
 Technical Area: **Biological Resources** Project: **Fountain Wind Project**

Revision No. 1 Date 1-31-2023  
 Technical Staff: Carol Watson, Chris Huntley, Justin Wood, Leane Dunn, Elliot Maldonado  
 Technical Senior: Jon Hilliard

Project Manager: Leonidas Payne Docket: 23-OPT-01

SITING REGULATIONS	INFORMATION	AFC PAGE NUMBER AND SECTION NUMBER	ADEQUATE YES OR NO	INFORMATION REQUIRED TO MAKE AFC CONFORM WITH REGULATIONS
				<p>forester in 2008, approximately 1.2 mi (1.9 km) southeast of the Project Site between Ward Butte and Green Mountain (CDFW 2020b; Figure 2).” Upon review of the CDFW BIOS Spotted Owl Observations layer, the last known observation for SHA0046 was 2019 where a CSO was “heard and seen”; 2020 where a CSO was “heard and seen”; and 2021 where a “female believed to be a sub adult” was observed. There are also CSO positive (POS) observations in SHA0124 for 2020 where a CSO was “heard”; an activity center in 2008 where CSO was “heard and seen”; and 2008 where a CSO was discovered while flagging a stream crossing (assumed to be the incidental observation described above). There is another activity center, SHA0068, approximately 2.5-3 miles from the project site, from 2021 where CSO was “heard and saw female...male was heard south of call station.” Though some of these occurrences seem to be dated after the date of this report, this recent data does indicate that CSO is likely actively using habitat near the project site.</p> <p>Please also note that these positive identifications occurred in “CWHR Spotted Owl Predicted Habitat” that is defined as Low or Medium. Though it is true that much of the project site north of Hwy 299 is currently considered non-habitat in the</p>

Adequacy Issue: Adequate \_\_\_\_\_ Inadequate **X** **DATA ADEQUACY WORKSHEET**

Technical Area: **Biological Resources** Project: **Fountain Wind Project**

Revision No. 1 Date 1-31-2023

Technical Staff: Carol Watson, Chris Huntley, Justin Wood, Leane Dunn, Elliot Maldonado

Project Manager: Leonidas Payne Docket: 23-OPT-01

Technical Senior: Jon Hilliard

SITING REGULATIONS	INFORMATION	AFC PAGE NUMBER AND SECTION NUMBER	ADEQUATE YES OR NO	INFORMATION REQUIRED TO MAKE AFC CONFORM WITH REGULATIONS
				<p>CHWR model (likely due to the Fountain Fire as described in the report), there is low and moderate habitat areas within and near the project site. The statement, "Given the Project's proximity to much larger and contiguous areas of high suitability habitat on protected public lands (Lassen National Forest to the southeast and Shasta Trinity National Forest to the north and west; Figure 2), it is unlikely that CSOs would select the less suitable habitats within the heavily managed timberlands present within the Project Site" is not supported by the most recent available data.</p> <p><b>Required Information:</b> Please provide updated information on occurrences of spotted owl within and near the Project site.</p> <p><b>Topic:</b> The memo included data from American Wind Wildlife Institute (AWWI; now Renewable Energy Wildlife Institute), which provides a good overview of broad data across the United States. The memo states, "Based on AWWI's (2019) recent analysis of 193 postconstruction monitoring studies at 130 wind energy facilities in the US between 2002 and 2017, owls compose approximately 1.2% of unadjusted bird fatality incidents..." Though the potential for strikes is low,</p>

Adequacy Issue: Adequate \_\_\_\_\_ Inadequate **X** **DATA ADEQUACY WORKSHEET**

Technical Area: **Biological Resources** Project: **Fountain Wind Project**

Revision No. 1 Date 1-31-2023

Technical Staff: Carol Watson, Chris Huntley, Justin Wood, Leane Dunn, Elliot Maldonado

Project Manager: Leonidas Payne Docket: 23-OPT-01

Technical Senior: Jon Hilliard

SITING REGULATIONS	INFORMATION	AFC PAGE NUMBER AND SECTION NUMBER	ADEQUATE YES OR NO	INFORMATION REQUIRED TO MAKE AFC CONFORM WITH REGULATIONS
				<p>the potential is present if the area was suitable for NSO, which would require FESA consultation.</p> <p>The 2018 avian use study included data from the nearby Hatchet Ridge Wind Farm. Is there data available from the nearby Hatchet Ridge Wind Farm that could aid in species specific data for bird strikes?</p> <p><b>Required Information:</b> Please include the most recent available data on owl strikes from the Hatchet Ridge Wind Farm.</p> <p><b>Topic:</b> 2021 spotted owl memo. The memo included data from American Wind Wildlife Institute (AWWI; now Renewable Energy Wildlife Institute), which provides a good overview of broad data across the United States. The memo states, "Based on AWWI's (2019) recent analysis of 193 postconstruction monitoring studies at 130 wind energy facilities in the US between 2002 and 2017, owls compose approximately 1.2% of unadjusted bird fatality incidents..." Though the potential for strikes is low, the potential is present if the area was suitable for NSO, which would require FESA consultation.</p>

Adequacy Issue: Adequate \_\_\_\_\_ Inadequate **X** **DATA ADEQUACY WORKSHEET**

Technical Area: **Biological Resources** Project: **Fountain Wind Project**

Revision No. 1 Date 1-31-2023

Technical Staff: Carol Watson, Chris Huntley, Justin Wood, Leane Dunn, Elliot Maldonado

Project Manager: Leonidas Payne

Docket: 23-OPT-01

Technical Senior: Jon Hilliard

SITING REGULATIONS	INFORMATION	AFC PAGE NUMBER AND SECTION NUMBER	ADEQUATE YES OR NO	INFORMATION REQUIRED TO MAKE AFC CONFORM WITH REGULATIONS
				<p>The 2018 avian use study included data from the nearby Hatchet Ridge Wind Farm. Is there data available from the nearby Hatchet Ridge Wind Farm that could aid in species specific data for bird strikes?</p> <p><b>Required Information:</b> Please include the most recent available data on owl strikes from the Hatchet Ridge Wind Farm.</p> <p><b>Topic:</b> 2021 Northern Spotted Owl Memo. The memo states that, "Field surveys aligned with the USFWS endorsed Protocol for Surveying Proposed Management Activities that may Impact Northern Spotted Owls – 2012 Revision (USFWS 2012)." The 2012 USFWS Protocol (<a href="https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=83977&amp;inline">https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=83977&amp;inline</a>) requires "two years of six visits per year, including activity center searches, and, if appropriate, spot checks and activity center searches." The memo states that surveys were conducted between May and July of 2021, which only consists of one year of surveys.</p> <p>The survey results indicate that "a spotted owl pair and nest on US Forest Service land approximately 0.4 mi northeast of the nearest proposed turbine" was found; and "The same male spotted owl was</p>



Adequacy Issue: Adequate \_\_\_\_\_ Inadequate **X** **DATA ADEQUACY WORKSHEET**  
 Technical Area: **Biological Resources** Project: **Fountain Wind Project**

Revision No. 1 Date 1-31-2023  
 Technical Staff: Carol Watson, Chris Huntley, Justin Wood, Leane Dunn, Elliot Maldonado  
 Technical Senior: Jon Hilliard

Project Manager: Leonidas Payne Docket: 23-OPT-01

SITING REGULATIONS	INFORMATION	AFC PAGE NUMBER AND SECTION NUMBER	ADEQUATE YES OR NO	INFORMATION REQUIRED TO MAKE AFC CONFORM WITH REGULATIONS
				<p>again heard on July 19 and its leg band confirmed when the bird was visually observed approximately 0.3 mi from the nearest proposed turbine.” Whether the spotted owl detected was an CSO or NSO was not stated in the text but was stated on the legend in the figure. It is unclear if the owl detection was assumed to be a CSO based on previous memos, or was confirmed to be CSO, as no information on species determination was provided. Even though spotted owls were detected nearby, though slightly outside the 0.25-mile buffer, the conclusion states that, “...the likelihood of spotted owls nesting within the Project area or surrounding 0.25-mile buffer appears to be low.”</p> <p><b>Required Information:</b> Please conduct an additional round of surveys for spotted owl in accordance with the USFWS protocol.</p> <p>Please indicate whether the spotted owls observed were identified as CSO in the field or assumed to be CSO based on the Spotted Owl Risk Assessment.</p> <p><b>Topic:</b> Foothill yellow-legged frog and Cascades frog surveys: There appears to be areas where both eDNA and field surveys were conducted (yellow legged frogs) compared to areas where no</p>

Adequacy Issue: Adequate \_\_\_\_\_ Inadequate **X** **DATA ADEQUACY WORKSHEET**

Technical Area: **Biological Resources** Project: **Fountain Wind Project**

Revision No. 1 Date 1-31-2023

Technical Staff: Carol Watson, Chris Huntley, Justin Wood, Leane Dunn, Elliot Maldonado

Project Manager: Leonidas Payne Docket: 23-OPT-01

Technical Senior: Jon Hilliard

SITING REGULATIONS	INFORMATION	AFC PAGE NUMBER AND SECTION NUMBER	ADEQUATE YES OR NO	INFORMATION REQUIRED TO MAKE AFC CONFORM WITH REGULATIONS
				<p>data was collected if the drainage was located under a conductor or adjacent to the project. For example, the eDNA report indicated that streams located below long spans of overhead collection lines were not surveyed. Staff is concerned that these areas may still be impacted by the proposed project and that surveys for this species and cascades frog are old and do not reflect baseline conditions.</p> <p><b>Required Information:</b> Staff recommend that supplemental surveys for cascades and foothill yellow legged frogs be conducted in all areas of suitable habitat, not limited to the best or modeled habitat.</p> <p><b>Topic: Willow Flycatcher surveys.</b> Methods indicate that the biologists reviewed aerial imagery to eliminate unsuitable habitat. In review of the report, staff noted that no vegetation mapping was included, that the report does not include the time of day, weather, or longitude/latitude data. Confirms no vocal detections but does not mention visual detections or band observations. The report does not include a species list of detected birds, does not provide any data/information regarding brown-headed cowbirds and has no mention of required CDFW survey forms. Based on a review</p>

Adequacy Issue: Adequate \_\_\_\_\_ Inadequate **X** **DATA ADEQUACY WORKSHEET**

Technical Area: **Biological Resources** Project: **Fountain Wind Project**

Revision No. 1 Date 1-31-2023

Technical Staff: Carol Watson, Chris Huntley, Justin Wood, Leane Dunn, Elliot Maldonado

Project Manager: Leonidas Payne Dock et: 23-OPT-01

Technical Senior: Jon Hilliard

SITING REGULATIONS	INFORMATION	AFC PAGE NUMBER AND SECTION NUMBER	ADEQUATE YES OR NO	INFORMATION REQUIRED TO MAKE AFC CONFORM WITH REGULATIONS
				of the jurisdictional delineation report, over 100 acres of various riparian vegetation communities is present on the project site.  <b>Required Information:</b> Please provide the survey times, weather conditions, vegetation maps, bird list, recorded during the surveys. Please update the flycatcher surveys, last conducted in 2018 and provide a better description of the methodology used to exclude various riparian areas. Further the CDFW model should be compared to existing vegetation communities and site conditions mapped on the project site.
Appendix B (g) (13) (A) (vi)	fish and wildlife species that have commercial or recreational value.		Yes	
Appendix B (g) (13) (B)	Include a list of the species observed and those with a potential to occur within 1 mile of the project site and 1,000 feet from the outer edge of linear facility corridors. Maps or aerial photographs shall include:		No	Please reference Appendix B (g) (1) and Appendix B (g) (13) (A) (v) for a discussion of resources defined in the California Code of Regulations, title 20, sections 1201(d) and (u) that is deficient or missing.
Appendix B (g) (13) (B) (i)	Detailed maps at a scale of 1:6,000 or color aerial photographs taken at a recommended scale of 1 inch equals 500 feet (1:6,000) with a 30 percent overlap that show the proposed		No	Please reference Appendix B (g) (1) and Appendix B (g) (13) (A) (v) for a discussion of resources defined in the California Code of Regulations, title

Adequacy Issue: Adequate \_\_\_\_\_ Inadequate **X** **DATA ADEQUACY WORKSHEET**

Technical Area: **Biological Resources** Project: **Fountain Wind Project**

Revision No. 1 Date 1-31-2023

Technical Staff: Carol Watson, Chris Huntley, Justin Wood, Leane Dunn, Elliot Maldonado

Project Manager: Leonidas Payne Dock et: 23-OPT-01

Technical Senior: Jon Hilliard

SITING REGULATIONS	INFORMATION	AFC PAGE NUMBER AND SECTION NUMBER	ADEQUATE YES OR NO	INFORMATION REQUIRED TO MAKE AFC CONFORM WITH REGULATIONS
	project site and related facilities, biological resources including, but not limited to, those found during project-related field surveys and in records from the California Natural Diversity Database, and the associated areas where biological surveys were conducted. Label the biological resources and survey areas as well as the project facilities;			20, sections 1201(d) and (u) that is deficient or missing.
Appendix B (g) (13) (B) (ii)	A depiction of the extent of the thermal plume at the surface of the water if cooling water is proposed to be discharged to a water source. Provide the location for the intake and discharge structures on an aerial photograph(s) or detailed maps. Water sources include, but are not limited to, waterways, lakes, impoundments, oceans, bays, rivers, and estuaries; and		N/A	
Appendix B (g) (13) (B) (iii)	An aerial photo or wetlands delineation maps at a scale of (1:2,400) showing any potential jurisdictional and non-jurisdictional wetlands delineated out to 250 feet from the edge of disturbance if wetlands occur within 250 feet of the project site and/or related facilities that would be included with the U.S. Army Corps of Engineers Section 404 Permit application. For projects proposed to be located within the	TN # 248307-2 (Aquatic Resources Report) Page 14	No	<p><b>Topic:</b> It was unclear what the limits of the survey area were in the Aquatic Resources Report. The maps of the project area were not included in the Report. It is possible that the maps present in TN # 248329-7 (LSAA Figure 2 Aquatic Impacts) but it does not show Federal waters.</p> <p><b>Required Information:</b> Please provide the report figures or identify the existing submittal. Please clarify if the boundaries of the delineation were</p>

Adequacy Issue: Adequate \_\_\_\_\_ Inadequate **X** **DATA ADEQUACY WORKSHEET**

Technical Area: **Biological Resources** Project: **Fountain Wind Project**

Revision No. 1 Date 1-31-2023

Technical Staff: Carol Watson, Chris Huntley, Justin Wood, Leane Dunn, Elliot Maldonado

Project Manager: Leonidas Payne Dock et: 23-OPT-01

Technical Senior: Jon Hilliard

SITING REGULATIONS	INFORMATION	AFC PAGE NUMBER AND SECTION NUMBER	ADEQUATE YES OR NO	INFORMATION REQUIRED TO MAKE AFC CONFORM WITH REGULATIONS
	coastal zone, also provide aerial photographs or maps as described above that identify wetlands as defined by the Coastal Act.			limited to the project footprint or extended outside the project disturbance limits.
Appendix B (g) (13) (C)	A discussion of the biological resources at the proposed project site and related facilities. Related facilities include, but are not limited to, laydown and parking areas, gas and water supply pipelines, transmission lines, and roads. The discussion shall address the distribution of vegetation community types, denning or nesting sites, population concentrations, migration corridors, breeding habitats, and other appropriate biological resources including the following:		No	Please reference Appendix B (g) (1) and Appendix B (g) (13) (A) (v) for a discussion of resources defined in the California Code of Regulations, title 20, sections 1201(d) and (u) that is deficient or missing.
Appendix B (g) (13) (C) (i)	A list of all the species observed;		Yes	
Appendix B (g) (13) (C) (ii)	A list of sensitive species and habitats with a potential to occur (defined in (A) above); and		No	Please reference Appendix B (g) (1) and Appendix B (g) (13) (A) (v) for a discussion of resources defined in the California Code of Regulations, title 20, sections 1201(d) and (u) that is deficient or missing.
Appendix B (g) (13) (C) (iii)	If cooling water is taken directly from or discharged to a surface water feature source, include a description of the intake structure, screens, water volume, intake velocity		N/A	

Adequacy Issue: Adequate \_\_\_\_\_ Inadequate **X** **DATA ADEQUACY WORKSHEET**

Technical Area: **Biological Resources** Project: **Fountain Wind Project**

Revision No. 1 Date 1-31-2023

Technical Staff: Carol Watson, Chris Huntley, Justin Wood, Leane Dunn, Elliot Maldonado

Project Manager: Leonidas Payne Dock et: 23-OPT-01

Technical Senior: Jon Hilliard

<b>SITING REGULATIONS</b>	<b>INFORMATION</b>	<b>AFC PAGE NUMBER AND SECTION NUMBER</b>	<b>ADEQUATE YES OR NO</b>	<b>INFORMATION REQUIRED TO MAKE AFC CONFORM WITH REGULATIONS</b>
	<p>hydraulic zone field of influence, and the thermal plume dispersion area as depicted in response to B(ii) above. Describe the thermal plume size and dispersion under high and low tides, and in response to local currents and seasonal changes. Provide a discussion of the aquatic habitats, biological resources, and critical life stages found in these affected waters. For repower projects that anticipate no change in cooling water flow, this information shall be provided in the form of the most recent federal Clean Water Act 316(a) and (b) studies of entrainment and impingement impacts that has been completed within the last 5 years. For new projects or repower projects proposing to use once-through cooling and anticipating an increase in cooling water flow, provide a complete impingement and entrainment analysis per guidance in (D)(ii), below.</p>			
<p>Appendix B (g) (13) (D)</p>	<p>A description and results of all field studies and seasonal surveys used to provide biological baseline information about the project site and associated facilities. Include copies of the California Natural Diversity Database records and field survey forms</p>		<p>Yes</p>	

Adequacy Issue: Adequate \_\_\_\_\_ Inadequate **X** **DATA ADEQUACY WORKSHEET**

Technical Area: **Biological Resources** Project: **Fountain Wind Project**

Revision No. 1 Date 1-31-2023

Technical Staff: Carol Watson, Chris Huntley, Justin Wood, Leane Dunn, Elliot Maldonado

Project Manager: Leonidas Payne Dock et: 23-OPT-01

Technical Senior: Jon Hilliard

SITING REGULATIONS	INFORMATION	AFC PAGE NUMBER AND SECTION NUMBER	ADEQUATE YES OR NO	INFORMATION REQUIRED TO MAKE AFC CONFORM WITH REGULATIONS
	completed by the applicant’s biologist(s). Identify the date(s) the surveys were completed, methods used to complete the surveys, and the name(s) and qualifications of the biologists conducting the surveys. Include:			
Appendix B (g) (13) (D) (i)	Current biological resources surveys conducted using appropriate field survey protocols during the appropriate season(s). State and federal agencies with jurisdiction shall be consulted for field survey protocol guidance prior to surveys if a protocol exists;		No	Please reference Appendix B (g) (1) and Appendix B (g) (13) (A) (v) for a discussion of resources defined in the California Code of Regulations, title 20, sections 1201(d) and (u) that is deficient or missing.
Appendix B (g) (13) (D) (ii)	If cooling water is proposed to be taken directly from or discharged to a surface water feature source, seasonal aquatic resource studies and surveys shall be conducted. Aquatic resource survey data shall include, but is not limited to, fish trawls, ichthyoplankton and benthic sampling, and related temperature and water quality samples. For new projects or repower projects anticipating a change in cooling water flows, sampling protocols shall be provided to Commission staff for review and concurrence prior to the start of sampling. For repower projects not anticipating a change in cooling water flows, this information shall be provided in the form of the most recent federal		N/A	

Adequacy Issue: Adequate \_\_\_\_\_ Inadequate **X** **DATA ADEQUACY WORKSHEET**

Technical Area: **Biological Resources** Project: **Fountain Wind Project**

Revision No. 1 Date 1-31-2023

Technical Staff: Carol Watson, Chris Huntley, Justin Wood, Leane Dunn, Elliot Maldonado

Project Manager: Leonidas Payne Dock et: 23-OPT-01

Technical Senior: Jon Hilliard

<b>SITING REGULATIONS</b>	<b>INFORMATION</b>	<b>AFC PAGE NUMBER AND SECTION NUMBER</b>	<b>ADEQUATE YES OR NO</b>	<b>INFORMATION REQUIRED TO MAKE AFC CONFORM WITH REGULATIONS</b>
	Clean Water Act 316(b) impingement and entrainment impact study completed within 5 years of the AFC filing date; and			
Appendix B (g) (13) (D) (iii)	If the project or any related facilities could impact a jurisdictional or non-jurisdictional wetland, provide completed Army Corps of Engineers wetland delineation forms or determination of wetland status pursuant to Coastal Act requirements, name(s) and qualifications of biologist(s) completing the delineation, the results of the delineation and a table showing wetland acreage amounts to be impacted.		Yes	
Appendix B (g) (13) (E)	Impacts discussion of:			
Appendix B (g) (13) (E) (i)	all impacts (direct, indirect, and cumulative) to biological resources from project site preparation, construction activities, plant operation, maintenance, and closure. Discussion shall also address sensitive species habitat impacts from cooling tower drift and air emissions;		No	Please reference Appendix B (g) (1) and Appendix B (g) (13) (A) (v) for a discussion of resources defined in the California Code of Regulations, title 20, sections 1201(d) and (u) that is deficient or missing.
Appendix B (g) (13) (E) (ii)	facilities that propose to take water directly from, and/or discharge water to surface water features, daytime and nighttime impacts from		N/A	



Adequacy Issue: Adequate \_\_\_\_\_ Inadequate **X** **DATA ADEQUACY WORKSHEET**

Technical Area: **Biological Resources** Project: **Fountain Wind Project**

Revision No. 1 Date 1-31-2023

Technical Staff: Carol Watson, Chris Huntley, Justin Wood, Leane Dunn, Elliot Maldonado

Project Manager: Leonidas Payne Dock et: 23-OPT-01

Technical Senior: Jon Hilliard

<b>SITING REGULATIONS</b>	<b>INFORMATION</b>	<b>AFC PAGE NUMBER AND SECTION NUMBER</b>	<b>ADEQUATE YES OR NO</b>	<b>INFORMATION REQUIRED TO MAKE AFC CONFORM WITH REGULATIONS</b>
	the intake and discharge of water during operation, water velocity at the intake screen, the intake field of influence, impingement, entrainment, and thermal discharge. Provide a discussion of the extent of the thermal plume, effluent chemicals, oxygen saturation, intake pump operations, and the volume and rate of cooling water flow at the intake and discharge location; and			
Appendix B (g) (13) (E) (iii)	Methods to control biofouling and chemical concentrations, and temperatures that are currently being discharged or will be discharged to receiving waters.		N/A	
Appendix B (g) (13) (F)	A discussion of all feasible mitigation measures including, but not limited to the following:		No	Please reference Appendix B (g) (1) and Appendix B (g) (13) (A) (v) for a discussion of resources defined in the California Code of Regulations, title 20, sections 1201(d) and (u) that is deficient or missing.
Appendix B (g) (13) (F) (i)	All measures proposed to avoid and/or reduce adverse impacts to biological resources;		No	Please reference Appendix B (g) (1) and Appendix B (g) (13) (A) (v) for a discussion of resources defined in the California Code of Regulations, title 20, sections 1201(d) and (u) that is deficient or missing.

Adequacy Issue: Adequate \_\_\_\_\_ Inadequate **X** **DATA ADEQUACY WORKSHEET**

Technical Area: **Biological Resources** Project: **Fountain Wind Project**

Revision No. 1 Date 1-31-2023

Technical Staff: Carol Watson, Chris Huntley, Justin Wood, Leane Dunn, Elliot Maldonado

Project Manager: Leonidas Payne Dock et: 23-OPT-01

Technical Senior: Jon Hilliard

SITING REGULATIONS	INFORMATION	AFC PAGE NUMBER AND SECTION NUMBER	ADEQUATE YES OR NO	INFORMATION REQUIRED TO MAKE AFC CONFORM WITH REGULATIONS
Appendix B (g) (13) (F) (ii)	All off-site habitat mitigation and habitat improvement or compensation, and an identification of contacts for compensation habitat and management;	DEIR Biological Resources TN # 248288-6	Yes	Mitigation approach described in DEIR.
Appendix B (g) (13) (F) (iii)	Design features to better disperse or eliminate a thermal discharge;		N/A	
Appendix B (g) (13) (F) (iv)	All measures proposed to avoid or minimize adverse impacts of cooling water intake. This shall include a Best Technology Available (BTA) discussion. If BTA is not being proposed, the rationale for not selecting BTA must be provided; and		N/A	
Appendix B (g) (13) (F) (v)	Educational programs to enhance employee awareness during construction and operation to protect biological resources.	TN 248289-1 Page 1-5 to 1-6	Yes	A WEAP has been added to the FEIR.
Appendix B (g) (13) (G)	A discussion of compliance and monitoring programs to ensure the effectiveness of impact avoidance and mitigation measures incorporated into the project.		No	Please reference Appendix B (g) (1) and Appendix B (g) (13) (A) (v) for a discussion of resources defined in the California Code of Regulations, title 20, sections 1201(d) and (u) that is deficient or missing.
Appendix B (g) (13) (H)	Submit copies of any preliminary correspondence between the project applicant and state and federal resource agencies regarding whether federal or state permits from other agencies such as the U.S. Fish and	TN # 248329-2	Yes	An application for a Lake and Streambed Alteration Agreement was submitted to CDFW. However, we cannot determine the adequacy of the application

Adequacy Issue: Adequate \_\_\_\_\_ Inadequate **X** **DATA ADEQUACY WORKSHEET**

Technical Area: **Biological Resources** Project: **Fountain Wind Project**

Revision No. 1 Date 1-31-2023

Technical Staff: Carol Watson, Chris Huntley, Justin Wood, Leane Dunn, Elliot Maldonado

Project Manager: Leonidas Payne Dock et: 23-OPT-01

Technical Senior: Jon Hilliard

<b>SITING REGULATIONS</b>	<b>INFORMATION</b>	<b>AFC PAGE NUMBER AND SECTION NUMBER</b>	<b>ADEQUATE YES OR NO</b>	<b>INFORMATION REQUIRED TO MAKE AFC CONFORM WITH REGULATIONS</b>
	Wildlife Service, the National Marine Fisheries Service, the U.S. Army Corps of Engineers, the California Department of Fish and Game, and the Regional Water Quality Control Board will be required for the proposed project.			at this time pending the review of hydrologic and engineering data.
Appendix B (i) (1) (A)	Tables that identify laws, regulations, ordinances, standards, adopted local, regional, state, and federal land use plans, leases, and permits applicable to the proposed project, and a discussion of the applicability of, and conformance with each. The table or matrix shall explicitly reference pages in the application wherein conformance, with each law or standard during both construction and operation of the facility is discussed; and	DEIR Biological Resources TN # 248288-6 <b>Pages 3.4-31 to 3.4-35</b>	Yes	
Appendix B (i) (1) (B)	Tables that identify each agency with jurisdiction to issue applicable permits, leases, and approvals or to enforce identified laws, regulations, standards, and adopted local, regional, state and federal land use plans, and agencies that would have permit approval or enforcement authority, but for the exclusive authority of the Commission to certify sites and related facilities.		No	<b>Please provide said table or indicate appropriate TN# and page.</b>

Adequacy Issue: Adequate \_\_\_\_\_ Inadequate **X** **DATA ADEQUACY WORKSHEET**

Technical Area: **Biological Resources** Project: **Fountain Wind Project**

Revision No. 1 Date 1-31-2023

Technical Staff: Carol Watson, Chris Huntley, Justin Wood, Leane Dunn, Elliot Maldonado

Project Manager: Leonidas Payne Dock et: 23-OPT-01

Technical Senior: Jon Hilliard

SITING REGULATIONS	INFORMATION	AFC PAGE NUMBER AND SECTION NUMBER	ADEQUATE YES OR NO	INFORMATION REQUIRED TO MAKE AFC CONFORM WITH REGULATIONS
Appendix B (i) (2)	The name, title, phone number, address (required), and email address (if known), of an official who was contacted within each agency, and provide the name of the official who will serve as a contact person for Commission staff.		No	Please provide said information or indicate appropriate TN# and page.
Appendix B (i) (3)	A schedule indicating when permits outside the authority of the commission will be obtained and the steps the applicant has taken or plans to take to obtain such permits.	TN 48322 Table 3. List of Potential Permits and Status Page 16-17	Yes	

Adequacy Issue: Adequate \_\_\_\_\_ Inadequate  X  **DATA ADEQUACY WORKSHEET**  
 Technical Area: **Cultural Resources** Project: **Fountain Wind Project**

Revision No. \_\_\_\_\_ Date January 31, 2023

Technical Staff: Lauren DeOliveira, Roger Hatheway

Project Manager: Lon Payne

Docket: 23-OPT-01

Technical Senior: Gabriel Roark

<b>SITING REGULATIONS</b>	<b>INFORMATION</b>	<b>AFC PAGE NUMBER AND SECTION NUMBER</b>	<b>ADEQUATE YES OR NO</b>	<b>INFORMATION REQUIRED TO MAKE AFC CONFORM WITH REGULATIONS</b>
Appendix B (g) (1)	...provide a discussion of the existing site conditions, the expected direct, indirect and cumulative impacts due to the construction, operation and maintenance of the project, the measures proposed to mitigate adverse environmental impacts of the project, the effectiveness of the proposed measures, and any monitoring plans proposed to verify the effectiveness of the mitigation.	* Shasta County Initial Study at Section V (Cultural Resources); * Scoping Report (Transcript of Community Comments); * Shasta County DEIR Section 3.6 Cultural Resources; MMs 3.6-1 through 3.6-3d; * Shasta County FEIR pp. 1-14 to 1-15, Section 2.2.2 Responses to Comments from Tribal Entities and Members; * Staff Report to Shasta County Planning Commission dated 6/22/21 pp. 6-7  TN248291-120230103T125541_Tribal Addendum (1)	<b>Yes</b>	
Appendix B (g) (2) (A)	A summary of the ethnology, prehistory, and history of the region with emphasis on the area within no more than a 5-mile radius of the project location.	Shasta County DEIR Section 3.6.1 Cultural Resources: Setting, pp. 3.6-3 to 3.6-6	<b>Yes</b>	

<p>Appendix B (g) (2) (B)</p>	<p>The results of a literature search to identify cultural resources within an area not less than a 1-mile radius around the project site and not less than one-quarter (0.25) mile on each side of the linear facilities. Identify any cultural resources listed pursuant to ordinance by a city or county or recognized by any local historical or archaeological society or museum. Literature searches to identify the above cultural resources must be completed by, or under the direction of, individuals who meet the Secretary of the Interior's Professional Standards for the technical area addressed.</p> <p>Copies of California Department of Parks and Recreation (DPR) 523 forms (Title 14 CCR section 4853) shall be provided for all cultural resources (ethnographic, architectural, historical, and archaeological) identified in the literature search as being 45 years or older or of exceptional importance as defined in the National Register Bulletin Guidelines, (36CFR60.4(g)). A copy of the USGS 7.5' quadrangle map of the literature search area delineating the areas of all past surveys and noting the California Historical Resources Information System (CHRIS) identifying number shall be provided. Copies also shall be provided of all technical reports whose survey coverage is wholly or partly within .25 mile of the area surveyed for the project under section (g)(2)(C), or which report on any archaeological excavations or architectural surveys within the literature search area.</p>	<p>Stantec Consulting Services (Stantec), 2019. Fountain Wind Energy Project Cultural Resources Phase 1 Inventory of 4,463 Acres, Shasta County, California. Prepared for Fountain Wind LLC. December 2019. Section 6.1 CHRIS Record Search Results, pp. 2, 15, 18, Appendix B</p> <p>DEIR, p. 3.6-6</p> <p>Cultural Report Author Qualifications</p> <p>Confidential Appendix C: DPR Forms</p>	<p><b>No</b></p>	<p>Provide a copy of the Northeast Information Center request letter, USGS 7.5' quadrangle map of the literature search area delineating the areas of all past surveys and noting the CHRIS identifying number, and response letter.</p> <p>Describe efforts to identify any cultural resources listed or recognized by a city, county, or local historical and archaeological societies or museums.</p> <p>Provide copies of California Department of Parks and Recreation (DPR) 523 forms (Title 14 CCR section 4853) shall be provided for all cultural resources (ethnographic, architectural, historical, and archaeological) identified in the literature search.</p> <p>Provide copies of all technical reports whose survey coverage is wholly or partly within .25 mile of the area surveyed for the project. These reports are listed in Appendix B, Table 1, of the Administrative Draft of the Fountain Wind Energy Project Cultural Resources Phase 1 Inventory of 4,463 Acres docketed report.</p> <p>Provide copies of previous studies that report on any archaeological excavations or architectural surveys within the literature search area (1 mile buffer from project site).</p>
-----------------------------------	---	---	------------------	--

<p>Appendix B (g) (2) (C)</p>	<p>The results of new surveys or surveys less than 5 years old shall be provided if survey records of the area potentially affected by the project are more than 5 years old. Surveys to identify new cultural resources must be completed by (or under the direction of) individuals who meet the Secretary of the Interior’s Professional Standards for the technical area addressed.</p> <p>New pedestrian archaeological surveys shall be conducted inclusive of the project site and project linear facility routes, extending to no less than 200’ around the project site, substations and staging areas, and to no less than 50’ to either side of the right-of-way of project linear facility routes. New historic architecture field surveys in rural areas shall be conducted inclusive of the project site and the project linear facility routes, extending no less than .5 mile out from the proposed plant site and from the routes of all above-ground linear facilities. New historic architecture field surveys in urban and suburban areas shall be conducted inclusive of the project site, extending no less than one parcel’s distance from all proposed plant site boundaries. New historic architecture field reconnaissance (“windshield survey”) in urban and suburban areas shall be conducted along the routes of all linear facilities to identify, inventory, and characterize structures and districts that appear to be older than 45 years or that are exceptionally significant, whatever their age.</p> <p>A technical report of the results of the new surveys, conforming to the Archaeological Resource Management Report format (CA Office of Historic Preservation Feb 1990), which</p>	<p>* Shasta County DEIR Cultural Resources: Table 3.6-1 Cultural Resources in the Area of Direct Impact * Stantec Consulting Services (Stantec), 2019. Fountain Wind Energy Project Cultural Resources Phase 1 Inventory of 4,463 Acres, Shasta County, California. Prepared for Fountain Wind LLC. December 2019. * Stantec, 2020a. Addendum 1: Update to The Fountain Wind Energy Project Cultural Resources Phase 1 Inventory of 4,463 Acres, Shasta County, California. Prepared for Fountain Wind LLC. March 18, 2020. * Stantec, 2020b. Addendum 2: Updated Cultural Resources Inventory Report: Tribal Coordination and Correspondence. Prepared for Fountain Wind LLC. March 23, 2020. Cultural Report Author Qualifications</p> <p>20230111T150116_Confidential Cultural Survey Update.</p>	<p><b>No</b></p>	<p>Provide Figure 4 (Survey Coverage Map) under confidential designation so that the boundaries of the archaeological survey are verifiable (no less than 200’ around the project site, substations and staging areas, and to no less than 50’ to either side of the right-of-way of project linear facility routes). Conduct a historic architecture field survey inclusive of the project site and the project linear facility routes, extending no less than .5 mile out from the proposed plant site and from the routes of all above-ground linear facilities. A Secretary of the Interior-qualified historian or architectural historian shall conduct or oversee this survey.</p> <p>The following information is needed for the cultural resources inventory report to meet the Archaeological Resource Management Report (ARMR) guidelines:</p> <ul style="list-style-type: none"> <li>• Title Page needs the name of topographic maps, keywords (trinomials, primary numbers, or other resource numbers, or page numbers where listed; township and range of project). See ARMR, pp. 5–6.</li> <li>• Executive Summary: Address significance evaluations of identified resources; address impacts and recommendations; disclose disposition of any field notes, collections, or reports. See ARMR, p. 6.</li> <li>• Project Information/Introduction: Add location map and other figures that were left out of the report; add schedule for construction of the project; add statements of qualification for other personnel. See ARMR, pp. 6–7.</li> <li>• Research Design: Add a research design that informs the significance evaluations of identified cultural resources; this is wholly</li> </ul>
-----------------------------------	---	--	------------------	--

Adequacy Issue: Adequate \_\_\_\_\_ Inadequate  X  **DATA ADEQUACY WORKSHEET**  
 Technical Area: **Cultural Resources** Project: **Fountain Wind Project**

Revision No. \_\_\_\_\_ Date January 31, 2023  
 Technical Staff: Lauren DeOliveira, Roger Hatheway

Project Manager: Lon Payne

Docket: 23-OPT-01

Technical Senior: Gabriel Roark

SITING REGULATIONS	INFORMATION	AFC PAGE NUMBER AND SECTION NUMBER	ADEQUATE YES OR NO	INFORMATION REQUIRED TO MAKE AFC CONFORM WITH REGULATIONS
	is incorporated by reference in its entirety, shall be separately provided and submitted (under confidential cover if archaeological site locations are included).	Confidential DPR Forms Pt1 20230111T150100_  TN248291-6_20230103T125604_Figure - Sites Built Before 1977		<p>absent from project documentation. See ARMR, pp. 9–10.</p> <ul style="list-style-type: none"> <li>• Methods: Provide a discussion of the research conducted to evaluate resource significance (the report is silent on this matter, other than reporting the records search and reviewing some historic maps). Disclose disposition of any field notes, collections, or reports. See ARMR, pp. 10–11.</li> <li>• Report of Findings (Results): Sketch maps are needed for the following DPR 523 form sets: FW-12, FW-13, FOU0919-2-14, FOU0923-1-2, and FOU1015. See ARMR, p. 12.</li> <li>• Discussion/Interpretation and Management Considerations (Conclusions): Add discussion that references research design. See ARMR, pp. 15–19.</li> <li>• References Cited: Include bibliographic entries for all historic maps consulted.</li> </ul> <p>Please provide a copy of the currently missing Stantec, 2020a. Addendum 1: Update to The Fountain Wind Energy Project Cultural Resources Phase 1 Inventory of 4,463 Acres, Shasta County, California. Prepared for Fountain Wind LLC. March 18, 2020. This will need to be reviewed for adequacy when provided.</p>



Adequacy Issue: Adequate \_\_\_\_\_ Inadequate  X  **DATA ADEQUACY WORKSHEET**  
 Technical Area: **Cultural Resources** Project: **Fountain Wind Project**

Revision No. \_\_\_\_\_ Date January 31, 2023  
 Technical Staff: Lauren DeOliveira, Roger Hatheway

Project Manager: Lon Payne

Docket: 23-OPT-01

Technical Senior: Gabriel Roark

<b>SITING REGULATIONS</b>	<b>INFORMATION</b>	<b>AFC PAGE NUMBER AND SECTION NUMBER</b>	<b>ADEQUATE YES OR NO</b>	<b>INFORMATION REQUIRED TO MAKE AFC CONFORM WITH REGULATIONS</b>
Appendix B (g) (2) (C) cont.	Information included in the technical report shall also be provided in the Application for Certification, except that confidential information (archaeological sites or areas of religious significance) shall be submitted under a request for confidentiality pursuant to California Code of Regulations, title 20, section 2501 et seq. At a minimum, the technical report shall include:	* Stantec Consulting Services (Stantec), 2019. Fountain Wind Energy Project Cultural Resources Phase 1 Inventory of 4,463 Acres, Shasta County, California. Prepared for Fountain Wind LLC. December 2019. * Stantec, 2020a. Addendum 1: Update to The Fountain Wind Energy Project Cultural Resources Phase 1 Inventory of 4,463 Acres, Shasta County, California. Prepared for Fountain Wind LLC. March 18, 2020.	<b>Yes</b>	

Adequacy Issue: Adequate \_\_\_\_\_ Inadequate   X    
 Technical Area: **Cultural Resources**

**DATA ADEQUACY WORKSHEET**  
 Project: **Fountain Wind Project**

Revision No. \_\_\_\_\_ Date   January 31, 2023  

Technical Staff:   Lauren DeOliveira, Roger Hatheway  

Project Manager:   Lon Payne  

Docket:   23-OPT-01  

Technical Senior:   Gabriel Roark  

<b>SITING REGULATIONS</b>	<b>INFORMATION</b>	<b>AFC PAGE NUMBER AND SECTION NUMBER</b>	<b>ADEQUATE YES OR NO</b>	<b>INFORMATION REQUIRED TO MAKE AFC CONFORM WITH REGULATIONS</b>
Appendix B (g) (2) (C) (i)	The summary from Appendix B (g)(2)(A) and the literature search results from Appendix B (g)(2)(B);	* Shasta County DEIR Section 3.6.1 Cultural Resources Setting; Section 6.1 CHRIS Record Search Results * Stantec Consulting Services (Stantec), 2019. Fountain Wind Energy Project Cultural Resources Phase 1 Inventory of 4,463 Acres, Shasta County, California. Prepared for Fountain Wind LLC. December 2019. * Stantec, 2020a. Addendum 1: Update to The Fountain Wind Energy Project Cultural Resources Phase 1 Inventory of 4,463 Acres, Shasta County, California. Prepared for Fountain Wind LLC. March 18, 2020.  Confidential DPR Forms Pt1 20230111T150100_  Confidential DPR Forms Pt220230111T150107_	<b>No</b>	Provide revised summary of literature search results from Appendix B(g)(2)(B).

Adequacy Issue: Adequate \_\_\_\_\_ Inadequate   X  

Technical Area: **Cultural Resources**

Project Manager: Lon Payne

**DATA ADEQUACY WORKSHEET**

Project: **Fountain Wind Project**

Docket: 23-OPT-01

Revision No. \_\_\_\_\_ Date January 31, 2023

Technical Staff: Lauren DeOliveira, Roger Hatheway

Technical Senior: Gabriel Roark

SITING REGULATIONS	INFORMATION	AFC PAGE NUMBER AND SECTION NUMBER	ADEQUATE YES OR NO	INFORMATION REQUIRED TO MAKE AFC CONFORM WITH REGULATIONS
Appendix B (g) (2) (C) (ii)	The survey procedures and methodology used to identify cultural resources and a discussion of the resources identified by the survey;	* Stantec Consulting Services (Stantec), 2019. Fountain Wind Energy Project Cultural Resources Phase 1 Inventory of 4,463 Acres, Shasta County, California. Prepared for Fountain Wind LLC. December 2019 Section 5.0 Methods * Stantec, 2020a. Addendum 1: Update to The Fountain Wind Energy Project Cultural Resources Phase 1 Inventory of 4,463 Acres, Shasta County, California. Prepared for Fountain Wind LLC. March 18, 2020. Methods Section.  20230111T150116_Confidential Cultural Survey Update.	<b>No</b>	Provide a revised discussion of survey procedures, methods used to identify and evaluate cultural resources, and CEQA implications, incorporating information from the historic architecture survey and other edits to the cultural resources phase 1 inventory report. This discussion must include a version that excludes confidential cultural resources information to facilitate responsible public disclosure.

Adequacy Issue: Adequate \_\_\_\_\_ Inadequate **X** **DATA ADEQUACY WORKSHEET**  
 Technical Area: **Cultural Resources** Project: **Fountain Wind Project**

Revision No. \_\_\_\_\_ Date January 31, 2023  
 Technical Staff: Lauren DeOliveira, Roger Hatheway

Project Manager: Lon Payne

Docket: 23-OPT-01

Technical Senior: Gabriel Roark

<b>SITING REGULATIONS</b>	<b>INFORMATION</b>	<b>AFC PAGE NUMBER AND SECTION NUMBER</b>	<b>ADEQUATE YES OR NO</b>	<b>INFORMATION REQUIRED TO MAKE AFC CONFORM WITH REGULATIONS</b>
Appendix B (g) (2) (C) (iii)	Copies of all new and updated DPR 523(A) forms. If a cultural resource may be impacted by the project, also include the appropriate DPR 523 detail form for each such resource;	Stantec Consulting Services (Stantec), 2019. Fountain Wind Energy Project Cultural Resources Phase 1 Inventory of 4,463 Acres, Shasta County, California. Prepared for Fountain Wind LLC. December 2019  Confidential DPR Forms Pt220230111T150107_	<b>No</b>	Provide copies of all new and updated DPR 523 forms per this requirement; these copies must include any DPR 523 forms completed as part of the historic built environment survey required under Appendix B(g)(2)(C).
Appendix B (g) (2) (C) (iv)	A map at a scale of 1:24,000 U.S. Geological Survey quadrangle depicting the locations of all previously known and newly identified cultural resources compiled through the research required by Appendix B (g)(2)(B) and Appendix B (g)(2)(C) (ii); and	Stantec Consulting Services (Stantec), 2019. Fountain Wind Energy Project Cultural Resources Phase 1 Inventory of 4,463 Acres, Shasta County, California. Prepared for Fountain Wind LLC. December 2019 Figure 5. Recorded Resources and Isolates.	<b>No</b>	Please provide the aforementioned map(s).

Adequacy Issue: Adequate \_\_\_\_\_ Inadequate   X   **DATA ADEQUACY WORKSHEET**  
 Technical Area: **Cultural Resources**  
 Project: **Fountain Wind Project**  
 Project Manager: Lon Payne Docket: 23-OPT-01

Revision No. \_\_\_\_\_ Date January 31, 2023  
 Technical Staff: Lauren DeOliveira, Roger Hatheway  
 Technical Senior: Gabriel Roark

<b>SITING REGULATIONS</b>	<b>INFORMATION</b>	<b>AFC PAGE NUMBER AND SECTION NUMBER</b>	<b>ADEQUATE YES OR NO</b>	<b>INFORMATION REQUIRED TO MAKE AFC CONFORM WITH REGULATIONS</b>
Appendix B (g) (2) (C) (v)	The names and qualifications of the cultural resources specialists who contributed to and were responsible for literature searches, surveys, and preparation of the technical report.	TN248291-5_20230103T125603 Cultural Report Author Qualifications  Stantec Consulting Services (Stantec), 2019. Fountain Wind Energy Project Cultural Resources Phase 1 Inventory of 4,463 Acres, Shasta County, California. Prepared for Fountain Wind LLC. December 2019 Section 5.0 Methods	<b>No</b>	Please provide missing resumes in TN248291-5_20230103T125603 Cultural Report Author Qualifications, inclusive of a Secretary of the Interior-qualified architectural historian responsible for completing the missing architectural/built environment survey. The application is missing resumes for Dylan Stapleton Leven Kraushaar, Rudy Dinarte, Joshua Taylor, Brandy Doering, Georganne McMaster, Nathan Jereb, Spencer Frye, John Nadolski, and Joshua Peabody

<p>Appendix B (g) (2) (D)</p>	<p>Provide a copy of your request to the Native American Heritage Commission (NAHC) for information on Native American sacred sites and lists of Native Americans interested in the project vicinity, and copies of any correspondence received from the NAHC. Notify the Native Americans on the NAHC list about the project, including a project description and map. Provide a copy of all correspondence sent to Native American individuals and groups listed by the NAHC and copies of all responses. Provide a written summary of any oral responses.</p>	<p>Shasta County FEIR: Responses to Comments from Tribal Representatives Section 2.2.2; NAHC request letter</p> <p>TN248291-120230103T125541_Tribal Addendum (1) This is Addendum 2 Updated Cultural Resources Inventory</p> <p>TN248288-8_20230103T105258_DEIR Cultural And Tribal Cultural Resources (1)</p> <p>TN248320-4_20230104T135807_Pit River Council Meeting Minutes</p> <p>TN248320-5_20230104T135809_Pit River Meeting Agenda</p> <p>TN248320-6_20230104T135809_Presentation - Pit River Meeting</p> <p>TN248320-7_20230104T135810_Pit River Site Visit Confirmation</p>	<p><b>No</b></p>	<p>Please provide the original NAHC Sacred Lands File request letter.</p>
<p>Appendix B (g) (2) (E)</p>	<p>Include in the discussion of proposed mitigation measures required by (g)(1):</p>	<p>Shasta County DEIR Section 3-6 Cultural Resources Subsection</p>	<p><b>No</b></p>	<p>Please provide an updated discussion of proposed mitigation measures required by (g)(1), after an architectural/built environment</p>

Adequacy Issue: Adequate \_\_\_\_\_ Inadequate  X  **DATA ADEQUACY WORKSHEET**  
 Technical Area: **Cultural Resources** Project: **Fountain Wind Project**

Revision No. \_\_\_\_\_ Date January 31, 2023  
 Technical Staff: Lauren DeOliveira, Roger Hatheway

Project Manager: Lon Payne

Docket: 23-OPT-01

Technical Senior: Gabriel Roark

SITING REGULATIONS	INFORMATION	AFC PAGE NUMBER AND SECTION NUMBER	ADEQUATE YES OR NO	INFORMATION REQUIRED TO MAKE AFC CONFORM WITH REGULATIONS
		3.6.3.2 Direct and Indirect Effects of the Project: Mitigation Measures 3.6-1 through 3.6-3d		survey (See also Appendix B (g) (2) (C)) has been prepared.  Please also provide an updated discussion that is suitable for public disclosure (only containing non-confidential cultural resources information).
Appendix B (g) (2) (E) (i)	A discussion of measures proposed to mitigate project impacts to known cultural resources;	Shasta County DEIR Section 3-6 Cultural Resources Subsection 3.6.3.2 Direct and Indirect Effects of the Project: Mitigation Measures 3.6-1 through 3.6-3d	<b>No</b>	Please provide updated mitigation measures proposed to mitigate project impacts to known cultural resources as necessary after an architectural/built environment survey (See also Appendix B (g) (2) (C)) has been prepared.
Appendix B (g) (2) (E) (ii)	A set of contingency measures proposed to mitigate potential impacts to previously unknown cultural resources and any unanticipated impacts to known cultural resources; and	Shasta County DEIR Section 3-6 Cultural Resources Subsection 3.6.3.2 Direct and Indirect Effects of the Project: Mitigation Measures 3.6-1 through 3.6-3d	<b>No</b>	Please provide updated mitigation measures proposed to mitigate potential impacts to previously unknown cultural resources as necessary after an architectural/built environment survey (See also Appendix B (g) (2) (C)) has been prepared.

Adequacy Issue: Adequate \_\_\_\_\_ Inadequate  X  **DATA ADEQUACY WORKSHEET**  
 Technical Area: **Cultural Resources** Project: **Fountain Wind Project**

Revision No. \_\_\_\_\_ Date January 31, 2023

Technical Staff: Lauren DeOliveira, Roger Hatheway

Project Manager: Lon Payne

Docket: 23-OPT-01

Technical Senior: Gabriel Roark

<b>SITING REGULATIONS</b>	<b>INFORMATION</b>	<b>AFC PAGE NUMBER AND SECTION NUMBER</b>	<b>ADEQUATE YES OR NO</b>	<b>INFORMATION REQUIRED TO MAKE AFC CONFORM WITH REGULATIONS</b>
Appendix B (g) (2) (E) (iii)	Educational programs to enhance employee awareness during construction and operation to protect cultural resources.	Shasta County DEIR Section 3-6 Cultural Resources Subsection 3.6.3.2 Direct and Indirect Effects of the Project: Mitigation Measures 3.6-1 through 3.6-3d  TN248291-120230103T125541_Tribal Addendum. This is Addendum 2 Updated Cultural Resources Inventory  Final EIR, Appendix G, Table G-1, pp. E-11 to E-13	<b>Yes</b>	



Adequacy Issue: Adequate \_\_\_\_\_ Inadequate   X   **DATA ADEQUACY WORKSHEET**  
 Technical Area: **Cultural Resources** Project: **Fountain Wind Project**

Revision No. \_\_\_\_\_ Date January 31, 2023  
 Technical Staff: Lauren DeOliveira, Roger Hatheway

Project Manager: Lon Payne Docket: 23-OPT-01 Technical Senior: Gabriel Roark

<b>SITING REGULATIONS</b>	<b>INFORMATION</b>	<b>AFC PAGE NUMBER AND SECTION NUMBER</b>	<b>ADEQUATE YES OR NO</b>	<b>INFORMATION REQUIRED TO MAKE AFC CONFORM WITH REGULATIONS</b>
Appendix B (i) (1) (A)	Tables that identify laws, regulations, ordinances, standards, adopted local, regional, state, and federal land use plans, leases, and permits applicable to the proposed project, and a discussion of the applicability of, and conformance with each. The table or matrix shall explicitly reference pages in the application wherein conformance, with each law or standard during both construction and operation of the facility is discussed; and	* Table of Applicable LORS * Shasta County Staff report dated 6/22/21 to the Planning Commission, pp. 12-13 * Stantec Consulting Services (Stantec), 2019. Fountain Wind Energy Project Cultural Resources Phase 1 Inventory of 4,463 Acres, Shasta County, California. Prepared for Fountain Wind LLC. December 2019, p. 48.  TN248288-8_20230103T105258_DEIR Cultural And Tribal Cultural Resources, pp. 3.6-16 – 3.6-18	<b>No</b>	Add the authorities listed on pp. 3.6-16 – 3.6-18 to the Table of Applicable LORS and discuss the project's conformance with each.
Appendix B (i) (1) (B)	Tables that identify each agency with jurisdiction to issue applicable permits, leases, and approvals or to enforce identified laws, regulations, standards, and adopted local, regional, state and federal land use plans, and agencies which would have permit approval or enforcement authority, but for the exclusive authority of the Commission to certify sites and related facilities.	DEIR Section 2 Description of Project and Alternatives, p. 2-41, Table 2-8 (Summary of Permits and Approvals)	<b>Yes</b>	

Adequacy Issue: Adequate \_\_\_\_\_ Inadequate  X  **DATA ADEQUACY WORKSHEET**  
 Technical Area: **Cultural Resources** Project: **Fountain Wind Project**

Revision No. \_\_\_\_\_ Date  January 31, 2023

Technical Staff:  Lauren DeOliveira, Roger Hatheway

Project Manager:  Lon Payne

Docket:  23-OPT-01

Technical Senior:  Gabriel Roark

<b>SITING REGULATIONS</b>	<b>INFORMATION</b>	<b>AFC PAGE NUMBER AND SECTION NUMBER</b>	<b>ADEQUATE YES OR NO</b>	<b>INFORMATION REQUIRED TO MAKE AFC CONFORM WITH REGULATIONS</b>
Appendix B (i) (2)	The name, title, phone number, address (required), and email address (if known), of an official who was contacted within each agency, and provide the name of the official who will serve as a contact person for Commission staff.	Scoping Report Appendix B, Direct Mail Notice	<b>No</b>	Although the Scoping Report identifies the agencies contacted for CEQA scoping, the application does not provide the names and contact information for agency personnel. Please provide required phone numbers, addresses, etc.
Appendix B (i) (3)	A schedule indicating when permits outside the authority of the commission will be obtained and the steps the applicant has taken or plans to take to obtain such permits.	Table 3 in Project Description	<b>Yes</b>	

Adequacy Issue: Adequate   X   Inadequate \_\_\_\_\_  
 Technical Area:   Efficiency – Energy Resources    
 Project Manager:   Leonidas Payne  

**DATA ADEQUACY WORKSHEET**  
 Project:   Fountain Wind Project    
 Docket:   23-OTP-01  

Revision No.   0   Date   January 24, 2023    
 Technical Staff:   Kenneth Salyphone    
 Technical Senior:   Shahab Khoshmashrab  

SITING REGULATIONS	INFORMATION	AFC PAGE NUMBER AND SECTION NUMBER	ADEQUATE YES OR NO	INFORMATION REQUIRED TO MAKE AFC CONFORM WITH REGULATIONS
Appendix B (g) (1)	...provide a discussion of the existing site conditions, the expected direct, indirect and cumulative impacts due to the construction, operation and maintenance of the project, the measures proposed to mitigate adverse environmental impacts of the project, the effectiveness of the proposed measures, and any monitoring plans proposed to verify the effectiveness of the mitigation.	Chapter 2: Description of Project Section 2.1: Project Overview Section 2.2: Project Location Section 2.4: Description of the Project Section 2.4.4.3 Operation and Maintenance Facility Section 2.4.5: Site Preparation and Construction Section 3.2: Aesthetics Section 3.7: Energy	Y	
Appendix B (h) (4) (A)	Heat and mass balance diagrams for design conditions for each mode of operation.	n/a		
Appendix B (h) (4) (B)	Annual fuel consumption in BTUs for each mode of operation, including hot restarts and cold starts.	Section 3.7.3.2: Direct and Indirect Effects of the Project Table 3.7-5: Project Energy Consumption During Operation	Y	
Appendix B (h) (4) (C)	Annual net electrical energy produced in MWh for each mode of operation including starts and shutdowns.	Section 3.7.3.2: Direct and Indirect Effects of the Project (Operation and Maintenance)	Y	605,491 MWh/yr

Adequacy Issue: Adequate  Inadequate   
 Technical Area: Efficiency – Energy Resources  
 Project Manager: Leonidas Payne

**DATA ADEQUACY WORKSHEET**  
 Project: Fountain Wind Project  
 Docket: 23-OTP-01

Revision No. 0 Date January 24, 2023  
 Technical Staff: Kenneth Salyphone  
 Technical Senior: Shahab Khoshmashrab

SITING REGULATIONS	INFORMATION	AFC PAGE NUMBER AND SECTION NUMBER	ADEQUATE YES OR NO	INFORMATION REQUIRED TO MAKE AFC CONFORM WITH REGULATIONS
Appendix B (h) (4) (D)	Number of hours the plant will be operated in each design condition in each year.	Section 2.1 Project Overview Section 3.7.3.2: Operation and Maintenance	Y	2,803 hours/year
Appendix B (h) (4) (E)	If the project will be a cogeneration facility, calculations showing compliance with applicable efficiency and operating standards.	n/a		
Appendix B (h) (4) (F)	A discussion of alternative generating technologies available for the project, including the projected efficiency of each, and an explanation why the chosen equipment was selected over these alternatives.	Section 2.5: Description of Alternatives Section 3.7.3.4 Direct and Indirect Effects of Alternatives Chapter 4: Comparison of Alternatives	Y	
Appendix B (i) (1) (A)	Tables that identify laws, regulations, ordinances, standards, adopted local, regional, state, and federal land use plans, leases, and permits applicable to the proposed project, and a discussion of the applicability of, and conformance with each. The table or matrix shall explicitly reference pages in the application wherein conformance, with each law or standard during both construction and operation of the facility is discussed; and	n/a		

Adequacy Issue: Adequate  Inadequate   
 Technical Area: Efficiency – Energy Resources  
 Project Manager: Leonidas Payne

**DATA ADEQUACY WORKSHEET**  
 Project: Fountain Wind Project  
 Docket: 23-OTP-01

Revision No. 0 Date January 24, 2023  
 Technical Staff: Kenneth Salyphone  
 Technical Senior: Shahab Khoshmashrab

SITING REGULATIONS	INFORMATION	AFC PAGE NUMBER AND SECTION NUMBER	ADEQUATE YES OR NO	INFORMATION REQUIRED TO MAKE AFC CONFORM WITH REGULATIONS
Appendix B (i) (1) (B)	Tables that identify each agency with jurisdiction to issue applicable permits, leases, and approvals or to enforce identified laws, regulations, standards, and adopted local, regional, state and federal land use plans, and agencies which would have permit approval or enforcement authority, but for the exclusive authority of the Commission to certify sites and related facilities.	n/a		
Appendix B (i) (2)	The name, title, phone number, address (required), and email address (if known), of an official who was contacted within each agency, and provide the name of the official who will serve as a contact person for Commission staff.	n/a		
Appendix B (i) (3)	A schedule indicating when permits outside the authority of the commission will be obtained and the steps the applicant has taken or plans to take to obtain such permits.	n/a		

Adequacy Issue: Adequate  X  Inadequate \_\_\_\_\_  
 Technical Area:  Facility Design   
 Project Manager:  Leonidas Payne

**DATA ADEQUACY WORKSHEET**  
 Project:  Fountain Wind Project   
 Docket:  23-OPT-01

Revision No.  0  Date  January 24, 2023   
 Technical Staff:  Kenneth Salyphone   
 Technical Senior:  Shahab Khoshmashrab

SITING REGULATIONS	INFORMATION	AFC PAGE NUMBER AND SECTION NUMBER	ADEQUATE YES OR NO	INFORMATION REQUIRED TO MAKE AFC CONFORM WITH REGULATIONS
Appendix B (h) (1) (A)	A description of the site conditions and investigations or studies conducted to determine the site conditions used as the basis for developing design criteria. The descriptions shall include, but not be limited to, seismic and other geologic hazards, adverse conditions that could affect the project’s foundation, adverse meteorological and climatic conditions, and flooding hazards, if applicable.	Chapter 2: Description of Project Section 2.1: Project Overview Section 2.2: Project Location Section 2.4: Description of the Project Section 2.4.4.3 Operation and Maintenance Facility Section 2.4.5: Site Preparation and Construction Section 3.2: Aesthetics	Y	
Appendix B (h) (1) (B)	A discussion of any measures proposed to improve adverse site conditions.	Section 2.4.5: Site Preparation	Y	
Appendix B (h) (1) (C)	A description of the proposed foundation types, design criteria (including derivation), analytical techniques, assumptions, loading conditions, and loading combinations to be used in the design of facility structures and major mechanical and electrical equipment.	Chapter 2: Description of Project Section 2.1: Project Overview Section 2.2: Project Location Section 2.4: Description of the Project Section 2.4.5: Site Preparation and Construction	Y	

Adequacy Issue: Adequate  X  Inadequate \_\_\_\_\_  
 Technical Area:  Facility Design   
 Project Manager:  Leonidas Payne

**DATA ADEQUACY WORKSHEET**  
 Project:  Fountain Wind Project   
 Docket:  23-OPT-01

Revision No.  0  Date  January 24, 2023   
 Technical Staff:  Kenneth Salyphone   
 Technical Senior:  Shahab Khoshmashrab

<b>SITING REGULATIONS</b>	<b>INFORMATION</b>	<b>AFC PAGE NUMBER AND SECTION NUMBER</b>	<b>ADEQUATE YES OR NO</b>	<b>INFORMATION REQUIRED TO MAKE AFC CONFORM WITH REGULATIONS</b>
Appendix B (h) (1) (D)	For each of the following facilities or systems, provide a description including drawings, dimensions, surface-area requirements, typical operating data, and performance and design criteria for protection from impacts due to adverse site conditions:	Chapter 2: Description of Project Section 2.1: Project Overview Section 2.2: Project Location Section 2.4: Description of the Project Table 2-1: Project Components Section 2.4.1: Wind Turbine Generators Figure 2-4a Section 2.4.5: Site Preparation and Construction Section 3.2: Aesthetics Section 3.7: Energy	Y	
Appendix B (h) (1) (D) (i)	The power generation system;	Section 2.1: Project Overview Section 2.4: Description of Project Table 2-1: Project Components Section 2.4.1: Wind Turbine Generators	Y	
Appendix B (h) (1) (D) (ii)	The heat dissipation system;	n/a		

Adequacy Issue: Adequate  Inadequate   
 Technical Area: **Facility Design**  
 Project Manager: Leonidas Payne

**DATA ADEQUACY WORKSHEET**  
 Project: **Fountain Wind Project**  
 Docket: 23-OPT-01

Revision No. 0 Date January 24, 2023  
 Technical Staff: Kenneth Salyphone  
 Technical Senior: Shahab Khoshmashrab

SITING REGULATIONS	INFORMATION	AFC PAGE NUMBER AND SECTION NUMBER	ADEQUATE YES OR NO	INFORMATION REQUIRED TO MAKE AFC CONFORM WITH REGULATIONS
Appendix B (h) (1) (D) (iii)	The cooling water supply system, and, where applicable, pre-plant treatment procedures;	n/a		
Appendix B (h) (1) (D) (iv)	The atmospheric emission control system;	n/a		
Appendix B (h) (1) (D) (v)	The waste disposal system and on-site disposal sites;	Section 2.4.8: Water, Wastewater, Waste, and Hazardous Materials Section 3.11: Hazardous and Hazardous Materials	Y	
Appendix B (h) (1) (D) (vi)	The noise emission abatement system;	Section 3.13: Noise and Vibration TN#24291-6: Noise Report	Y	
Appendix B (h) (1) (D) (vii)	The geothermal resource conveyance and re-injection lines (if applicable);	n/a		
Appendix B (h) (1) (D) (viii)	Switchyards/transformer systems; and	Section 2.4.3: Project Substation, Switching Station, and Interconnection Facilities	Y	
Appendix B (h) (1) (D) (ix)	Other significant facilities, structures, or system components proposed by the applicant.	Section 2.4.4: Other Infrastructure	Y	



Adequacy Issue: Adequate  X  Inadequate \_\_\_\_\_  
 Technical Area:  Facility Design   
 Project Manager:  Leonidas Payne

**DATA ADEQUACY WORKSHEET**  
 Project:  Fountain Wind Project   
 Docket:  23-OPT-01

Revision No.  0  Date  January 24, 2023   
 Technical Staff:  Kenneth Salyphone   
 Technical Senior:  Shahab Khoshmashrab

SITING REGULATIONS	INFORMATION	AFC PAGE NUMBER AND SECTION NUMBER	ADEQUATE YES OR NO	INFORMATION REQUIRED TO MAKE AFC CONFORM WITH REGULATIONS
Appendix B (i) (1) (A)	Tables that identify laws, regulations, ordinances, standards, adopted local, regional, state, and federal land use plans, leases, and permits applicable to the proposed project, and a discussion of the applicability of, and conformance with each. The table or matrix shall explicitly reference pages in the application wherein conformance, with each law or standard during both construction and operation of the facility is discussed; and	Section 2.6: Permits and Approvals	Y	
Appendix B (i) (1) (B)	Tables that identify each agency with jurisdiction to issue applicable permits, leases, and approvals or to enforce identified laws, regulations, standards, and adopted local, regional, state and federal land use plans, and agencies which would have permit approval or enforcement authority, but for the exclusive authority of the Commission to certify sites and related facilities.	Section 2.6: Permits and Approvals	Y	
Appendix B (i) (2)	The name, title, phone number, address (required), and email address (if known), of an official who was contacted within each agency, and provide the name of the official who will serve as a contact person for Commission staff.	n/a		
Appendix B (i) (3)	A schedule indicating when permits outside the authority of the commission will be obtained and the steps the applicant has taken or plans to take to obtain such permits.	n/a		

Adequacy Issue: Adequate \_\_\_\_\_ Inadequate **X**  
 Technical Area: **Geological Hazards**  
 Project Manager: Leonidas Payne

**DATA ADEQUACY WORKSHEET**  
 Project: **Fountain Wind Project**  
 Docket: 23-OPT-01

Revision No. 1 Date 1/26/2023  
 Technical Staff: Mike Turner  
 Technical Senior: Karim Abulaban

<b>SITING REGULATIONS</b>	<b>INFORMATION</b>	<b>AFC PAGE NUMBER AND SECTION NUMBER</b>	<b>ADEQUATE YES OR NO</b>	<b>INFORMATION REQUIRED TO MAKE AFC CONFORM WITH REGULATIONS</b>
Appendix B (g) (1)	...provide a discussion of the existing site conditions, the expected direct, indirect, and cumulative impacts due to the construction, operation and maintenance of the project, the measures proposed to mitigate adverse environmental impacts of the project, the effectiveness of the proposed measures, and any monitoring plans proposed to verify the effectiveness of the mitigation.	Existing Conditions: DEIR Section 3.9.1 Setting (Geology and Soils)  Preliminary Geotech Report  Impacts: DEIR 3.9.3 Direct and Indirect Effects;  DEIR Section 3.9.4 Cumulative Analysis	No	Final Geotechnical and Geohazard Report.
Appendix B (g) (17) (A)	A summary of the geology, seismicity, and geologic resources of the project site and related facilities, including linear facilities.	DEIR Section 3.9.1 Setting (Geology and Soils)	No	Final Geotechnical and Geohazard Report.
Appendix B (g) (17) (B)	A map at a scale of 1:24,000 and description of all recognized stratigraphic units, geologic structures, and geomorphic features within two (2) miles of the project site and along proposed facilities. Include an analysis of the likelihood of ground rupture, seismic shaking, mass wasting and slope stability, liquefaction, subsidence, tsunami runup, and expansion or collapse of soil structures at the plant site. Describe known geologic hazards along or crossing linear facilities.	DEIR Section 3.9 Geology and Soils Figure 3.9-3 Regional Faults	No	Final Geotechnical and Geohazard Report.

Adequacy Issue: Adequate \_\_\_\_\_ Inadequate **X**  
 Technical Area: **Geological Hazards**  
 Project Manager: Leonidas Payne

**DATA ADEQUACY WORKSHEET**  
 Project: **Fountain Wind Project**  
 Docket: 23-OPT-01

Revision No. 1 Date 1/26/2023  
 Technical Staff: Mike Turner  
 Technical Senior: Karim Abulaban

SITING REGULATIONS	INFORMATION	AFC PAGE NUMBER AND SECTION NUMBER	ADEQUATE YES OR NO	INFORMATION REQUIRED TO MAKE AFC CONFORM WITH REGULATIONS
Appendix B (g) (17) (C)	A map and description of geologic resources of recreational, commercial, or scientific value which may be affected by the project. Include a discussion of the techniques used to identify and evaluate these resources.	Not Provided but the applicant notes in the Appendix B Crosswalk Matrix that the project will not impact geologic resources of recreational, commercial, or scientific value.	No	Provide map and description
Appendix B (i) (1) (A)	Tables that identify laws, regulations, ordinances, standards, adopted local, regional, state, and federal land use plans, leases, and permits applicable to the proposed project, and a discussion of the applicability of, and conformance with each. The table or matrix shall explicitly reference pages in the application wherein conformance, with each law or standard during both construction and operation of the facility is discussed; and	Existing Conditions: DEIR Section 3.9.1.3.	No	Provide table  Existing Conditions: DEIR Section 3.9.1.3; includes descriptions of applicable LORS but does not include a table or matrix referencing pages in the application wherein conformance with each LORS during both construction and operation of the facility.
Appendix B (i) (1) (B)	Tables that identify each agency with jurisdiction to issue applicable permits, leases, and approvals or to enforce identified laws, regulations, standards, and adopted local, regional, state, and federal land use plans, and agencies which would have permit approval or enforcement authority, but for the exclusive authority of the commission to certify sites and related facilities.	Existing Conditions: DEIR Section 3.9.1.3	No	Provide table  Existing Conditions: DEIR Section 3.9.1.3; includes descriptions of applicable LORS but does not include table.

Adequacy Issue: Adequate \_\_\_\_\_ Inadequate **X**  
 Technical Area: **Geological Hazards**  
 Project Manager: Leonidas Payne

**DATA ADEQUACY WORKSHEET**  
 Project: **Fountain Wind Project**  
 Docket: 23-OPT-01

Revision No. 1 Date 1/26/2023  
 Technical Staff: Mike Turner  
 Technical Senior: Karim Abulaban

<b>SITING REGULATIONS</b>	<b>INFORMATION</b>	<b>AFC PAGE NUMBER AND SECTION NUMBER</b>	<b>ADEQUATE YES OR NO</b>	<b>INFORMATION REQUIRED TO MAKE AFC CONFORM WITH REGULATIONS</b>
Appendix B (i) (2)	The name, title, phone number, address (required), and email address (if known), of an official who was contacted within each agency, and provide the name of the official who will serve as a contact person for Commission staff.	Existing Conditions: DEIR Section 3.9.1.3.	No	Provide information  Existing Conditions: DEIR Section 3.9.1.3; includes descriptions of applicable LORS but does not include contact information.
Appendix B (i) (3)	A schedule indicating when permits outside the authority of the commission will be obtained and the steps the applicant has taken or plans to take to obtain such permits.	--- Not Located ---	No	Provide information.

Adequacy Issue: Adequate \_\_\_\_\_ Inadequate **X**  
 Technical Area: **Hazards & Hazardous Materials**  
 Project Manager: Lon Payne

**DATA ADEQUACY WORKSHEET**  
 Project: **Fountain Wind Project**  
 Docket: 23-OPT-01

Revision No. \_\_\_\_\_ Date 01-31-23  
 Technical Staff: Aurie Patterson (Aspen)  
 Technical Senior: Brett Fooks

SITING REGULATIONS	INFORMATION	AFC PAGE NUMBER AND SECTION NUMBER	ADEQUATE YES OR NO	INFORMATION REQUIRED TO MAKE AFC CONFORM WITH REGULATIONS
Appendix B (e) (1)	A discussion of how facility closure will be accomplished in the event of premature or unexpected cessation of operations.	Shasta County DEIR <ul style="list-style-type: none"> <li>• Section 2.4.7 Decommissioning and Site Restoration</li> <li>• Section 3.11.3.2 a)</li> </ul>	No	Project Decommissioning is described in Section 2.4.7. Some discussion of decommissioning is included in several subsections in Section 3.11.3.2. However, subsection 3.11.3.2 b) should also have discussion of impacts due to decommissioning.
Appendix B (g) (1)	...provide a discussion of the existing site conditions, the expected direct, indirect and cumulative impacts due to the construction, operation and maintenance of the project, the measures proposed to mitigate adverse environmental impacts of the project, the effectiveness of the proposed measures, and any monitoring plans proposed to verify the effectiveness of the mitigation.	Shasta County DEIR Section 3.11 Hazardous Materials, all subsections and pages Shasta County FEIR, Appendix G Mitigation Monitoring and Reporting Program – Table G-1	No	A discussion of blasting is included in the setting section (Section 3.11.2.2). However, no discussion of blasting hazards is discussed in the Direct and Indirect Effects section (Section 3.11.3). Please add regulations and laws relative to blasting and explosives use to the Regulatory setting section (3.11.1.3). Please add a discussion of hazards related to the use, storage, and transportation of explosives for blasting during construction at the project site and how these hazards shall be mitigated.
Appendix B (g) (10) (A)	A list of all materials used or stored on-site which are hazardous or acutely hazardous, as defined in California Code of Regulations, title 22, section 66261.20 et seq., and a discussion of the toxicity of each material.	Table 2-3 Hazardous Materials in Shasta County DEIR Section 2.4.8.3 (Description of Project and Alternatives)	No	Provide additional information on the toxicity of the hazardous materials in Table 2-3.

Adequacy Issue: Adequate \_\_\_\_\_ Inadequate **X**  
 Technical Area: **Hazards & Hazardous Materials**  
 Project Manager: Lon Payne

**DATA ADEQUACY WORKSHEET**  
 Project: **Fountain Wind Project**  
 Docket: 23-OPT-01

Revision No. \_\_\_\_\_ Date 01-31-23  
 Technical Staff: Aurie Patterson (Aspen)  
 Technical Senior: Brett Fooks

<b>SITING REGULATIONS</b>	<b>INFORMATION</b>	<b>AFC PAGE NUMBER AND SECTION NUMBER</b>	<b>ADEQUATE YES OR NO</b>	<b>INFORMATION REQUIRED TO MAKE AFC CONFORM WITH REGULATIONS</b>
Appendix B (g) (10) (B)	A map at a scale of 1:24,000 depicting the location of schools, hospitals, daycare facilities, emergency response facilities and long-term health care facilities, within the area potentially affected by any release of hazardous materials.	Not included	No	The identified school is only 1.5 miles away and should be mapped. Clinics and other health care facilities are not identified and need to be mapped in appropriate proximity to the project site.
Appendix B (g) (10) (C)	A discussion of the storage and handling system for each hazardous material used or stored at the site.	Shasta County DEIR Section 3.11 Hazardous Materials Subsection 3.11.3.2 Direct and Indirect Effects of the Project Criteria (a)	No	Provide descriptions of how each of the hazardous materials identified in Table 2-3 Hazardous Materials will be stored and handled onsite during construction, operation, and decommissioning. The vague discussion in section 3.11.3.2 referencing a future HMBP and SPCC is not adequate; provide more detail on where these materials will be stored and handling requirements, including if worker training and/or PPE would be required.
Appendix B (g) (10) (D)	The protocol that will be used in modeling potential consequences of accidental releases that could result in offsite impacts. Identify the model(s) to be used, a description of all input assumptions, including meteorological conditions. The results of the modeling analysis can be submitted after the AFC is complete.	Not included	N/A	
Appendix B (g) (10) (E)	A discussion of whether a risk management plan (Health and Safety Code section 25531 et seq.) will be required, and if so, the requirements that will likely be incorporated into the plan.	Not included	No	Include a discussion of whether a risk management plan related to Hazardous Materials use by workers and hazardous materials exposure to the public and sensitive receptors is required, and requirements if necessary.

Adequacy Issue: Adequate \_\_\_\_\_ Inadequate **X**  
 Technical Area: **Hazards & Hazardous Materials**  
 Project Manager: Lon Payne

**DATA ADEQUACY WORKSHEET**  
 Project: **Fountain Wind Project**  
 Docket: 23-OPT-01

Revision No. \_\_\_\_\_ Date 01-31-23  
 Technical Staff: Aurie Patterson (Aspen)  
 Technical Senior: Brett Fooks

<b>SITING REGULATIONS</b>	<b>INFORMATION</b>	<b>AFC PAGE NUMBER AND SECTION NUMBER</b>	<b>ADEQUATE YES OR NO</b>	<b>INFORMATION REQUIRED TO MAKE AFC CONFORM WITH REGULATIONS</b>
Appendix B (g) (10) (F)	A discussion of measures proposed to reduce the risk of any release of hazardous materials.	Shasta County DEIR Section 3.11 Hazardous Materials Subsection 3.11.3.2 Direct and Indirect Effects of the Project Criteria (b)	No	The section indicates that an HMBP and SPCC that would be prepared would mitigate releases of hazardous materials. Please provide a discussion on any worker safety or training for how hazardous materials would be handled during construction.
Appendix B (g) (10) (G)	A discussion of the fire and explosion risks associated with the project.	<ul style="list-style-type: none"> <li>• Shasta County DEIR Section 3.16 Wildfire;</li> <li>• Quigley, Darin, and Syndy Zerr. 2021. Fountain Wind Project EIR Wildfire Effects Review. Letter to Shasta County Planning Commission. June 17.;</li> <li>• Staff Report to the Planning Commission dated 6/22/21 p. 8-9;</li> <li>• Fountain Wind Project Fire Safety Enhancement and Assessment. Letter for Shasta County Board of Supervisors from Darin Quigley, October 19, 2021.;</li> <li>• Letter from Henry Woltag to Paul Hellman, June 21, 2021</li> <li>• Shasta County Scoping Report at u) Wildfire</li> </ul>	No	A discussion of blasting is mentioned in the application but no mention of the explosive hazards due to the potential presence of explosives onsite during construction is found in any of the documents. Please add a discussion of the hazards of potential onsite explosives during construction in the Hazards and Hazardous Materials Section.

Adequacy Issue: Adequate \_\_\_\_\_ Inadequate **X**  
 Technical Area: **Hazards & Hazardous Materials**  
 Project Manager: Lon Payne

**DATA ADEQUACY WORKSHEET**  
 Project: **Fountain Wind Project**  
 Docket: 23-OPT-01

Revision No. \_\_\_\_\_ Date 01-31-23  
 Technical Staff: Aurie Patterson (Aspen)  
 Technical Senior: Brett Fooks

SITING REGULATIONS	INFORMATION	AFC PAGE NUMBER AND SECTION NUMBER	ADEQUATE YES OR NO	INFORMATION REQUIRED TO MAKE AFC CONFORM WITH REGULATIONS
Appendix B (i) (1) (A)	Tables that identify laws, regulations, ordinances, standards, adopted local, regional, state, and federal land use plans, leases, and permits applicable to the proposed project, and a discussion of the applicability of, and conformance with each. The table or matrix shall explicitly reference pages in the application wherein conformance, with each law or standard during both construction and operation of the facility is discussed; and	Shasta County DEIR Section 3.11.1.3 Regulatory Setting	No	Table is not provided; however, the section describes applicable laws and regulations. The discussion of the various regulations and laws do not provide discussion of how each regulation pertains to the Project; please modify to include this information.
Appendix B (i) (1) (B)	Tables that identify each agency with jurisdiction to issue applicable permits, leases, and approvals or to enforce identified laws, regulations, standards, and adopted local, regional, state and federal land use plans, and agencies that would have permit approval or enforcement authority, but for the exclusive authority of the Commission to certify sites and related facilities.	Shasta County DEIR Section 2.6 Permits and Approvals, Table 2-8	No	Permits and approvals required for blasting activities are not included in the Table. Additionally, the CADOT listing needs to be modified to include that it enforces Hazardous Materials transport (relevant to fuel deliveries and transport and disposal of any other hazardous materials)
Appendix B (i) (2)	The name, title, phone number, address (required), and email address (if known), of an official who was contacted within each agency, and provide the name of the official who will serve as a contact person for Commission staff.	Not included	No.	Provide contact information for officials at the agencies that would be contacted or be responsible for overseeing review of required permits and plans as related to hazards and hazardous materials
Appendix B (i) (3)	A schedule indicating when permits outside the authority of the commission will be obtained and the steps the applicant has taken or plans to take to obtain such permits.	Not included.	No	Provide schedule for permits that are relevant to hazards and hazardous materials



Adequacy Issue: Adequate \_\_\_\_\_ Inadequate **X**  
 Technical Area: **Land Use**  
 Project Manager: Lon Payne

**DATA ADEQUACY WORKSHEET**  
 Project: **Fountain Wind Project**  
 Docket: 23-OPT-01

Revision No. \_\_\_\_\_ Date \_\_\_\_\_  
 Technical Staff: Negar Vahidi, Tatiana Inouye  
 Technical Senior: Steve Kerr

SITING REGULATIONS	INFORMATION	AFC PAGE NUMBER AND SECTION NUMBER	ADEQUATE YES OR NO	INFORMATION REQUIRED TO MAKE AFC CONFORM WITH REGULATIONS
Appendix B (g) (1)	...provide a discussion of the existing site conditions, the expected direct, indirect and cumulative impacts due to the construction, operation and maintenance of the project, the measures proposed to mitigate adverse environmental impacts of the project, the effectiveness of the proposed measures, and any monitoring plans proposed to verify the effectiveness of the mitigation.	TN 248288: DEIR Forestry Resources; Section 3.8.3.2; pages 3.8-3 to 3.8-4 TN 248289-1: FEIR Vol 1; Section 1.2.3.2; page 1-16 TN 248312: Timber Conversion Permit; page 25 TN 248322: Executive Summary and Project Description; Section 4.4.1.2; page 9	No	<p><b>Please provide details on timber conversion activities for a comprehensive Forestry analysis.</b> The DEIR Forestry Resources Section 3.8 did not discuss the direct or indirect impacts associated with the quantity of timber that would be removed, the process for removing the timber, where the timber would be shipped and processed, and site treatment activities following timber removal. The information regarding quantity of timber to be removed and the removal/treatment procedures was not included in the 2020 DEIR Project Description. While the 2021 Timber Conversion Permit (TCP) included additional details on the proposed timber conversion activities, none of these specific timber-related activities were analyzed under CEQA in the 2020 DEIR or 2021 FEIR.</p> <p>Furthermore, as stated in page 25 of the Timberland Conversion Permit (TCP), the applicant did not prepare an analysis of Timber Supply Depletion for consideration in the CEQA document. A Timber Supply Depletion analysis was to be prepared at a later date as part of the Timber Harvest Plan (THP).</p>
Appendix B (g) (3) (A)	A discussion of existing land uses and current zoning at the site, land uses and land use patterns within one mile of the proposed site and within one-quarter mile of any project-related linear facilities. Include:	TN 248288: DEIR Description of Project and Alternatives; Section 2.2; pages 2-3 to 2-5	No	<p><b>Please update the Land Use and Zoning Designation figures.</b> The DEIR Project Description (TN 248288) includes a figure of the general plan land use and zoning designations for the proposed 2019 project area. This figure</p>

Adequacy Issue: Adequate \_\_\_\_\_ Inadequate  X   
 Technical Area:  Land Use   
 Project Manager:  Lon Payne

**DATA ADEQUACY WORKSHEET**  
 Project:  Fountain Wind Project   
 Docket:  23-OPT-01

Revision No. \_\_\_\_\_ Date \_\_\_\_\_  
 Technical Staff:  Negar Vahidi, Tatiana Inouye   
 Technical Senior:  Steve Kerr

SITING REGULATIONS	INFORMATION	AFC PAGE NUMBER AND SECTION NUMBER	ADEQUATE YES OR NO	INFORMATION REQUIRED TO MAKE AFC CONFORM WITH REGULATIONS
		TN 248288: DEIR Intro to Environmental Analysis; Section 3.1.4.10 (Land Use and Planning); page 3.1-19  TN 248322: Executive Summary and Project Description; Section 2.3; pages 1 to 2		will need to be updated to reflect the 2023 proposed project configuration and layout.  <b>Please provide information on existing land uses within one mile of the project.</b> Neither the DEIR Land Use and Planning analysis (TN 248288) nor the 2023 Executive Summary and Project Description (TN 248322) include a description of land uses (residential, recreational, commercial, industrial) within one mile of the project site.
Appendix B (g) (3) (A) (i)	An identification of residential, commercial, industrial, recreational, scenic, agricultural, natural resource protection, natural resource extraction, educational, religious, cultural, and historic areas, and any other area of unique land uses;	TN 248288: DEIR Intro to Environmental Analysis; Section 3.1.4.10 (Land Use and Planning); page 3.1-19  TN 248322: Executive Summary and Project Description; Section 2.3; pages 1 to 2	No	<b>Please provide information on existing land uses within one mile of the project.</b> Neither the DEIR Land Use and Planning analysis (TN 248288) nor the 2023 Executive Summary and Project Description (TN 248322) include a description of land uses (residential, recreational, commercial, industrial) within one mile of the project site.
Appendix B (g) (3) (A) (ii)	A discussion of any recent or proposed zone changes and/or general plan amendments; noticed by an elected or appointed board, commission, or similar entity at the state or local level;	TN 248322: Executive Summary and Project Description; Section 1.3.1; pages xi to xiv	Yes	
Appendix B (g) (3) (A) (iii)	Identification of all discretionary reviews by public agencies initiated or completed within 18 months prior to filing the application for those changes or developments identified in subsection (g)(3)(A)(ii); and	TN 248322: Executive Summary and Project Description; Section 1.3.1; pages xi to xiv	Yes	

Adequacy Issue: Adequate \_\_\_\_\_ Inadequate **X**  
 Technical Area: **Land Use**  
 Project Manager: Lon Payne

**DATA ADEQUACY WORKSHEET**  
 Project: **Fountain Wind Project**  
 Docket: 23-OPT-01

Revision No. \_\_\_\_\_ Date \_\_\_\_\_  
 Technical Staff: Negar Vahidi, Tatiana Inouye  
 Technical Senior: Steve Kerr

<b>SITING REGULATIONS</b>	<b>INFORMATION</b>	<b>AFC PAGE NUMBER AND SECTION NUMBER</b>	<b>ADEQUATE YES OR NO</b>	<b>INFORMATION REQUIRED TO MAKE AFC CONFORM WITH REGULATIONS</b>
Appendix B (g) (3) (A) (iv)	Legible maps of the areas identified in subsection (g)(3)(A) potentially affected by the project, on which existing land uses, jurisdictional boundaries, general plan designations, specific plan designations, and zoning have been clearly delineated.	TN 248288: DEIR Description of Project and Alternatives; Section 2.2; pages 2-3 to 2-5	No	<b>Please update the Land Use and Zoning Designation figures.</b> The DEIR Project Description (TN 248288) includes figures of the general plan land use and zoning designations for the proposed 2020 project area. These figures will need to be updated to reflect the 2023 proposed project configuration.
Appendix B (g) (3) (B)	A discussion of the compatibility of the proposed project with present and expected land uses, and conformity with any long-range land use plans adopted by any federal, state, regional, or local planning agencies. The discussion shall identify the need, if any, for land use decisions by another public agency or as part of the commission's decision that would be necessary to make the project conform to adopted federal, state, regional, or local coastal plans, land use plans, or zoning ordinances. Examples of land use decisions include general plan amendments, zoning changes, lot line adjustments, parcel mergers, subdivision maps, Agricultural Land Conservation Act contracts cancellation, and Airport Land Use Plan consistency determinations.	TN 248322: Executive Summary and Project Description; Section 1.3.1; pages xi to xiv  TN 248293: CEQA Staff Report; pages 1 to 14  TN 248296: Project Permit Denial; pages 264 to 268	Yes	
Appendix B (g) (3) (C)	A discussion of the legal status of the parcel(s) on which the project is proposed. If the proposed site consists of more than one legal parcel, describe the method and timetable for merging or otherwise combining those parcels so that the proposed project, excluding linears	TN 248330: Shasta County Use Permit Application; pdf pages 8 to 16  TN 249296-9: Parcel Owners List	No	<b>Please revise the list of parcels within the project area.</b> The list of parcels within the proposed project area reflects the 2019 proposed project site. The list needs to be

Adequacy Issue: Adequate \_\_\_\_\_ Inadequate  X   
 Technical Area:  Land Use   
 Project Manager:  Lon Payne

**DATA ADEQUACY WORKSHEET**  
 Project:  Fountain Wind Project   
 Docket:  23-OPT-01

Revision No. \_\_\_\_\_ Date \_\_\_\_\_  
 Technical Staff:  Negar Vahidi, Tatiana Inouye   
 Technical Senior:  Steve Kerr

SITING REGULATIONS	INFORMATION	AFC PAGE NUMBER AND SECTION NUMBER	ADEQUATE YES OR NO	INFORMATION REQUIRED TO MAKE AFC CONFORM WITH REGULATIONS
	and temporary laydown or staging area, will be located on a single legal parcel. The merger need not occur prior to a decision on the Application but must be completed prior to the start of construction.	TN 248296-10: Figure-Parcels within 1000 ft TN 248330-3: Project Parcel Locational Data		updated to reflect the 2023 proposed project configuration, and specific parcels.
Appendix B (g) (3) (D)	A map at a scale of 1:24,000 and written description of agricultural land uses found within all areas affected by the proposed project. The description shall include:	TN 248288: DEIR Description of Project and Alternatives; Section 3.1.4.1; page 3.1-12	No	<b>Please provide map and location information for Prime Farmland.</b> The DEIR Agricultural analysis identifies that there is a 110-acre area of designated Prime Farmland approximately 0.25 mile southeast of a proposed turbine. The analysis concludes that there is no impact to agricultural resources. More information is needed for this analysis, specifically, a map showing the location of the Prime Farmland and the nearest turbine, access road(s), staging areas, etc.
Appendix B (g) (3) (D) (i)	Crop types, irrigation systems, and any special cultivation practices;	TN 248288: DEIR Description of Project and Alternatives; Section 3.1.4.1; page 3.1-12	No	<b>Please provide descriptions of agricultural activities.</b> More information is needed to describe the 110-acre area of designated Prime Farmland approximately 0.25 mile southeast of a proposed turbine, and the historic and current agricultural activities occurring in this area. Specifically, the DEIR Agricultural analysis must describe the farming activities (crop type, irrigation systems, any special cultivation practices) for the 110-acre agricultural site.
Appendix B (g) (3) (D) (ii)	Whether farmland affected by the project is prime, of statewide importance, or unique as defined by the California Department of Conservation; and	TN 248288: DEIR Description of Project and	Yes	

Adequacy Issue: Adequate \_\_\_\_\_ Inadequate  X   
 Technical Area:  Land Use   
 Project Manager:  Lon Payne

**DATA ADEQUACY WORKSHEET**  
 Project:  Fountain Wind Project   
 Docket:  23-OPT-01

Revision No. \_\_\_\_\_ Date \_\_\_\_\_  
 Technical Staff:  Negar Vahidi, Tatiana Inouye   
 Technical Senior:  Steve Kerr

SITING REGULATIONS	INFORMATION	AFC PAGE NUMBER AND SECTION NUMBER	ADEQUATE YES OR NO	INFORMATION REQUIRED TO MAKE AFC CONFORM WITH REGULATIONS
		Alternatives; Section 3.1.4.1; page 3.1-12		
Appendix B (g) (3) (D) (iii)	Direct, indirect, and cumulative effects on agricultural land uses. If the proposed site or related facilities are subject to an Agricultural Land Conservation contract, provide a written copy and a discussion of the status of the expiration or canceling of such contract.	TN 248288: DEIR Description of Project and Alternatives; Section 3.1.4.1; page 3.1-12	No	<p><b>Please provide descriptions of agricultural activities and their locations, and identify whether the 110-acre Prime Farmland site is subject to an Agricultural Land Conservation contract.</b> To identify potential indirect or cumulative impacts to agriculture, the DEIR Agricultural analysis requires more information regarding the type of agricultural activities at the 110-acre Prime Farmland site, and the location of other project disturbance activities (access roads, staging areas) relative to the site.</p> <p>The DEIR Agricultural analysis states that none of the parcels within the proposed project site are subject to a Williamson Act contract. However, the analysis does not identify whether the 110-acre Prime Farmland site that is located 0.25 mile from the nearest turbine is subject to an Agricultural Land Conservation contract.</p>
Appendix B (i) (1) (A)	Tables that identify laws, regulations, ordinances, standards, adopted local, regional, state, and federal land use plans, leases, and permits applicable to the proposed project, and a discussion of the applicability of, and conformance with each. The table or matrix shall explicitly reference pages in the application wherein conformance, with each law	TN 248290: Labor Regs Consistency Matrix  TN 248288: DEIR Intro to Environmental Analysis; Section 3.1.4.10 (Land Use and Planning); page 3.1-19	No	<p><b>Please describe the Conditions of Approval for a TPZ.</b> The Shasta County Code sections that were relevant during preparation of the 2020 DEIR and 2021 FEIR are identified in the DEIR's Land Use and Planning section (TN 248288) and in the Law, Ordinance, Regulation, or Standard Consistency Matrix (TN 248290). However, the discussion does not address the ordinance adopted by the Shasta County Board</p>

Adequacy Issue: Adequate \_\_\_\_\_ Inadequate **X**  
 Technical Area: **Land Use**  
 Project Manager: Lon Payne

**DATA ADEQUACY WORKSHEET**  
 Project: **Fountain Wind Project**  
 Docket: 23-OPT-01

Revision No. \_\_\_\_\_ Date \_\_\_\_\_  
 Technical Staff: Negar Vahidi, Tatiana Inouye  
 Technical Senior: Steve Kerr

SITING REGULATIONS	INFORMATION	AFC PAGE NUMBER AND SECTION NUMBER	ADEQUATE YES OR NO	INFORMATION REQUIRED TO MAKE AFC CONFORM WITH REGULATIONS
	or standard during both construction and operation of the facility is discussed; and			of Supervisors on July 12, 2022 to amend Section 17.88.035 of the Zoning Plan, which currently prohibits the construction of utility-scale wind project in the County.
Appendix B (i) (1) (B)	Tables that identify each agency with jurisdiction to issue applicable permits, leases, and approvals or to enforce identified laws, regulations, standards, and adopted local, regional, state and federal land use plans, and agencies that would have permit approval or enforcement authority, but for the exclusive authority of the Commission to certify sites and related facilities.	TN 248322: Executive Summary and Project Description; Section 5 (Project Permits), Table 3 (List of Potential Permits and Status), pages 16 to 17	Yes	
Appendix B (i) (2)	The name, title, phone number, address (required), and email address (if known), of an official who was contacted within each agency, and provide the name of the official who will serve as a contact person for Commission staff.	<b>NOT DOCKETED:</b> Fountain Wind Project Draft EIR Chapter 5 (Report Preparation), Section 5.4 (Entities Consulted and Recipients of the Draft EIR and/or the Notice of Availability), pages 5-3 to 5-5  File was obtained from the following site: <a href="https://www.shastacounty.gov/planning/page/draft-eir-fountain-wind-project">https://www.shastacounty.gov/planning/page/draft-eir-fountain-wind-project</a>	No	<b>Please provide agency contact information.</b> The DEIR list of federal, state, and local agencies consulted does not include the contact's phone number, address, or email address. The list does not indicate who should serve as the contact person for Commission staff.
Appendix B (i) (3)	A schedule indicating when permits outside the authority of the commission will be obtained	TN 248322: Executive Summary and Project	No	<b>Please provide schedule for obtaining permits.</b> The "List of Potential Permits and

Adequacy Issue: Adequate \_\_\_\_\_ Inadequate **X**  
 Technical Area: **Land Use**  
 Project Manager: Lon Payne

**DATA ADEQUACY WORKSHEET**  
 Project: **Fountain Wind Project**  
 Docket: 23-OPT-01

Revision No. \_\_\_\_\_ Date \_\_\_\_\_  
 Technical Staff: Negar Vahidi, Tatiana Inouye  
 Technical Senior: Steve Kerr

<b>SITING REGULATIONS</b>	<b>INFORMATION</b>	<b>AFC PAGE NUMBER AND SECTION NUMBER</b>	<b>ADEQUATE YES OR NO</b>	<b>INFORMATION REQUIRED TO MAKE AFC CONFORM WITH REGULATIONS</b>
	and the steps the applicant has taken or plans to take to obtain such permits.	Description; Section 5 (Project Permits), Table 3 (List of Potential Permits and Status), pages 16 to 17		Status" provided in Table 3 does not identify the steps involved or the schedule for obtaining the permits that are outside the authority of the commission.

Adequacy Issue: Adequate      Inadequate      **X**

**DATA ADEQUACY WORKSHEET**

Revision No. 0      Date February 2, 2023

Technical Area: **Noise**

Project: **Fountain Wind Project**

Technical Staff: **Ardalan Sofi**

Project Manager: **Leonidas Payne**

Docket: **23-OPT-01**

Technical Senior: **Shahab Khoshmashrab**

SITING REGULATIONS	INFORMATION	AFC PAGE NUMBER AND SECTION NUMBER	ADEQUATE YES OR NO	INFORMATION REQUIRED TO MAKE AFC CONFORM WITH REGULATIONS
Appendix B (g) (1)	...provide a discussion of the existing site conditions, the expected direct, indirect and cumulative impacts due to the construction, operation and maintenance of the project, the measures proposed to mitigate adverse environmental impacts of the project, the effectiveness of the proposed measures, and any monitoring plans proposed to verify the effectiveness of the mitigation.	<p>Noise Report TN 248290-1 – EXISTING NOISE ENVIRONMENT</p> <p>Noise Report TN 248290-1 – NOISE GENERATED DURING OPERATIONS</p> <p>Noise Report TN 248290-1 – NOISE GENERATED DURING CONSTRUCTION</p> <p>Noise Report TN 248290-1 – RECOMMENDED NOISE REDUCTION MEASURES</p> <p>DEIR Noise And Vibration TN 248288-15 – Sec 3.13.1.2 Environmental Setting - Noise Sources and Levels Environmental Setting – Sensitive Receptors</p> <p>DEIR Noise And Vibration TN 248288-15 – Sec 3.13.3 Direct and Indirect Effects</p> <p>DEIR Noise And Vibration TN 248288-15 – Sec 3.13.3.2 Direct and Indirect Effects of the Project</p> <p>DEIR Noise And Vibration TN 248288-15 – Sec 3.13.3.2 Direct and Indirect Effects of the Project – Mitigation Measure 3.13-2</p>	No	<p>The noise contour maps in Figures 5a and 5b of the Noise Report TN 248290-1 are generated based on the operation of all 72 turbines with maximum capacity of 5.7 MW. However, according to Section 1.1 of the revised Executive Summary and Project Description (TN 248322), the project currently proposes the construction and operation of up to 48 wind turbines, each with a maximum capacity of 7.2 MW.</p> <p>The Sound Pressure Level (SPL) of the proposed wind turbine with a 7.2 MW capacity is not provided in Noise Report (TN 248290-1) or DEIR Noise And Vibration (248288-15). Please also provide the SPL level for this turbine in both dBC and dBA.</p>



Adequacy Issue: Adequate Inadequate **X**

**DATA ADEQUACY WORKSHEET**

Revision No. 0 Date February 2, 2023

Technical Area: **Noise**

Project: **Fountain Wind Project**

Technical Staff: **Ardalan Sofi**

Project Manager: **Leonidas Payne**

Docket: **23-OPT-01**

Technical Senior: **Shahab Khoshmashrab**

SITING REGULATIONS	INFORMATION	AFC PAGE NUMBER AND SECTION NUMBER	ADEQUATE YES OR NO	INFORMATION REQUIRED TO MAKE AFC CONFORM WITH REGULATIONS
Appendix B (g) (4) (A)	A land use map which identifies residences, hospitals, libraries, schools, places of worship, or other facilities where quiet is an important attribute of the environment within the area impacted by the proposed project. The area potentially impacted by the proposed project is that area where, during either construction or operation, there is a potential increase of 5 dB(A) or more, over existing background levels.	<p>DEIR Noise And Vibration TN 248288-15 – Sec 3.13.1.2 Environmental Setting – Sensitive Receptors</p> <p>DEIR Noise And Vibration TN 248288-15 – Sec 3.13.1.2 Environmental Setting – Noise Sources and Levels – Figure 3.13-2</p>	Yes	
Appendix B (g) (4) (B)	A description of the ambient noise levels at those sites identified under subsection (g)(4)(A) which the applicant believes provide a representative characterization of the ambient noise levels in the project vicinity, and a discussion of the general atmospheric conditions, including temperature, humidity, and the presence of wind and rain at the time of the measurements. The existing noise levels shall be determined by taking noise measurements for a minimum of 25 consecutive hours at a minimum of one site. Other sites may be monitored for a lesser duration at the applicant's discretion, preferably during the same 25-hour period. The results of the noise level measurements shall be reported as hourly averages in Leq (equivalent sound or noise level), Ldn (day-night sound or noise level) or CNEL (Community Noise Equivalent Level) in units of dB(A). The L10, L50, and L90 values (noise levels exceeded 10 percent, 50 percent, and 90 percent of the time, respectively) shall also be reported in units of dB(A).	<p>Noise Report TN 248290-1 – EXISTING NOISE ENVIRONMENT</p> <p>Noise Report TN 248290-1 – EXISTING NOISE ENVIRONMENT – Noise Measurement Results Table 5 Figure 3</p> <p>DEIR Noise And Vibration TN 248288-15 – Sec 3.13.1.2 Environmental Setting – Noise Sources and Levels</p> <p>DEIR Noise And Vibration TN 248288-15 – Sec 3.13.1.2 Environmental Setting – Noise Sources and Levels TABLE 3.13-2</p>	Yes	

Adequacy Issue: Adequate  Inadequate

**DATA ADEQUACY WORKSHEET**

Revision No. 0 Date February 2, 2023

Technical Area: Noise

Project: Fountain Wind Project

Technical Staff: Ardalan Sofi

Project Manager: Leonidas Payne

Docket: 23-OPT-01

Technical Senior: Shahab Khoshmashrab

SITING REGULATIONS	INFORMATION	AFC PAGE NUMBER AND SECTION NUMBER	ADEQUATE YES OR NO	INFORMATION REQUIRED TO MAKE AFC CONFORM WITH REGULATIONS
Appendix B (g) (4) (C)	A description of the major noise sources of the project, including the range of noise levels and the tonal and frequency characteristics of the noise emitted.	<p>Noise Report TN 248290-1 – NOISE GENERATED DURING OPERATIONS</p> <p>Noise Report TN 248290-1 – NOISE GENERATED DURING OPERATIONS Figure 4</p> <p>Noise Report TN 248290-1 – NOISE GENERATED DURING CONSTRUCTION</p> <p>Noise Report TN 248290-1 – NOISE GENERATED DURING CONSTRUCTION – TABLE 9</p> <p>DEIR Noise And Vibration TN 248288-15 – Sec 3.13.3 Direct and Indirect Effects</p>	No	<p>The noise contour maps in Figures 5a and 5b of the Noise Report TN 248290-1 are generated based on the operation of all 72 turbines with maximum capacity of 5.7 MW. However, according to Section 1.1 of the revised Executive Summary and Project Description (TN 248322), the project currently proposes the construction and operation of up to 48 wind turbines, each with a maximum capacity of 7.2 MW.</p> <p>The Sound Pressure Level (SPL) of the proposed wind turbine with a 7.2 MW capacity is not provided in Noise Report (TN 248290-1) or DEIR Noise And Vibration (248288-15). Please also provide the SPL level for this turbine in both dBC and dBA.</p>

Adequacy Issue: Adequate Inadequate **X**

**DATA ADEQUACY WORKSHEET**

Revision No. 0 Date February 2, 2023

Technical Area: **Noise**

Project: **Fountain Wind Project**

Technical Staff: **Ardalan Sofi**

Project Manager: **Leonidas Payne**

Docket: **23-OPT-01**

Technical Senior: **Shahab Khoshmashrab**

SITING REGULATIONS	INFORMATION	AFC PAGE NUMBER AND SECTION NUMBER	ADEQUATE YES OR NO	INFORMATION REQUIRED TO MAKE AFC CONFORM WITH REGULATIONS
Appendix B (g) (4) (D)	An estimate of the project noise levels, during both construction and operation, at residences, hospitals, libraries, schools, places of worship or other facilities where quiet is an important attribute of the environment, within the area impacted by the proposed project.	<p>Noise Report TN 248290-1 – NOISE GENERATED DURING OPERATIONS TABLE 6, 7 Figure 5a, 5b</p> <p>Noise Report TN 248290-1 – NOISE GENERATED DURING CONSTRUCTION TABLE 9</p> <p>DEIR Noise And Vibration TN 248288-15 – Sec 3.13.3 Direct and Indirect Effects – Construction, Decommissioning, and Site Reclamation Noise and Vibration Impacts TABLE 3.13-5</p> <p>DEIR Noise And Vibration TN 248288-15 – Sec 3.13.3.2 Direct and Indirect Effects of the Project TABLE 3.13-6, 3.13-7 Figure 3.13-3</p>	No	<p>The noise contour maps in Figures 5a and 5b of the Noise Report TN 248290-1 are generated based on the operation of all 72 turbines with maximum capacity of 5.7 MW. However, according to Section 1.1 of the revised Executive Summary and Project Description (TN 248322), the project currently proposes the construction and operation of up to 48 wind turbines, each with a maximum capacity of 7.2 MW.</p> <p>The Sound Pressure Level (SPL) of the proposed wind turbine with a 7.2 MW capacity is not provided in Noise Report (TN 248290-1) or DEIR Noise And Vibration (248288-15). Please also provide the SPL level for this turbine in both dBC and dBA.</p>

Adequacy Issue: Adequate      Inadequate      **X**

**DATA ADEQUACY WORKSHEET**

Revision No. 0      Date February 2, 2023

Technical Area: **Noise**

Project: **Fountain Wind Project**

Technical Staff: **Ardalan Sofi**

Project Manager: **Leonidas Payne**

Docket: **23-OPT-01**

Technical Senior: **Shahab Khoshmashrab**

SITING REGULATIONS	INFORMATION	AFC PAGE NUMBER AND SECTION NUMBER	ADEQUATE YES OR NO	INFORMATION REQUIRED TO MAKE AFC CONFORM WITH REGULATIONS
Appendix B (g) (4) (E)	An estimate of the project noise levels within the project site boundary during both construction and operation and the impact to the workers at the site due to the estimated noise levels.	<p>Noise Report TN 248290-1 – NOISE GENERATED DURING OPERATIONS Figure 5a, 5b</p> <p>Noise Report TN 248290-1 – NOISE GENERATED DURING CONSTRUCTION</p> <p>DEIR Noise And Vibration TN 248288-15 – Sec 3.13.3.2 Direct and Indirect Effects of the Project Figure 3.13-3</p>	No	<p>The noise contour maps in Figures 5a and 5b of the Noise Report TN 248290-1 are generated based on the operation of all 72 turbines with maximum capacity of 5.7 MW. However, according to Section 1.1 of the revised Executive Summary and Project Description (TN 248322), the project currently proposes the construction and operation of up to 48 wind turbines, each with a maximum capacity of 7.2 MW.</p> <p>The Sound Pressure Level (SPL) of the proposed wind turbine with a 7.2 MW capacity is not provided in Noise Report (TN 248290-1) or DEIR Noise And Vibration (248288-15). Please also provide the SPL level for this turbine in both dBC and dBA.</p>

Adequacy Issue: Adequate Inadequate **X**

**DATA ADEQUACY WORKSHEET**

Revision No. 0 Date February 2, 2023

Technical Area: **Noise**

Project: **Fountain Wind Project**

Technical Staff: **Ardalan Sofi**

Project Manager: **Leonidas Payne**

Docket: **23-OPT-01**

Technical Senior: **Shahab Khoshmashrab**

SITING REGULATIONS	INFORMATION	AFC PAGE NUMBER AND SECTION NUMBER	ADEQUATE YES OR NO	INFORMATION REQUIRED TO MAKE AFC CONFORM WITH REGULATIONS
Appendix B (g) (4) (F)	The audible noise from existing switchyards and overhead transmission lines that would be affected by the project and estimates of the future audible noise levels that would result from existing and proposed switchyards and transmission lines. Noise levels shall be calculated at the property boundary for switchyards and at the edge of the rights-of-way for transmission lines.	<p>Noise Report TN 248290-1 – NOISE GENERATED DURING OPERATIONS – Onsite Collector Substation and Switching Station</p> <p>Noise Report TN 248290-1 – NOISE GENERATED DURING OPERATIONS – Corona Noise</p> <p>DEIR Noise And Vibration TN 248288-15 – Sec 3.13.3 Direct and Indirect Effects – Onsite Collector Substation and Switching Station Noise</p> <p>DEIR Noise And Vibration TN 248288-15 – Sec 3.13.3 Direct and Indirect Effects – Corona Noise</p> <p>DEIR Noise And Vibration TN 248288-15 – Sec 3.13.3.3 PG&amp;E Interconnection Infrastructure</p>	Yes	
Appendix B (i) (1) (A)	Tables which identify laws, regulations, ordinances, standards, adopted local, regional, state, and federal land use plans, leases, and permits applicable to the proposed project, and a discussion of the applicability of, and conformance with each. The table or matrix shall explicitly reference pages in the application wherein conformance, with each law or standard during both construction and operation of the facility is discussed; and	<p>Noise Report TN 248290-1 – REGULATORY BACKGROUND Figure N-1</p> <p>DEIR Noise And Vibration TN 248288-15 – Sec 3.13.1.3 Regulatory Setting</p>	Yes	

Adequacy Issue: Adequate      Inadequate      **X**

**DATA ADEQUACY WORKSHEET**

Revision No. 0      Date February 2, 2023

Technical Area: **Noise**

Project: **Fountain Wind Project**

Technical Staff: **Ardalan Sofi**

Project Manager: **Leonidas Payne**

Docket: **23-OPT-01**

Technical Senior: **Shahab Khoshmashrab**

SITING REGULATIONS	INFORMATION	AFC PAGE NUMBER AND SECTION NUMBER	ADEQUATE YES OR NO	INFORMATION REQUIRED TO MAKE AFC CONFORM WITH REGULATIONS
Appendix B (i) (1) (B)	Tables which identify each agency with jurisdiction to issue applicable permits, leases, and approvals or to enforce identified laws, regulations, standards, and adopted local, regional, state and federal land use plans, and agencies which would have permit approval or enforcement authority, but for the exclusive authority of the commission to certify sites and related facilities.	Noise Report TN 248290-1 – REGULATORY BACKGROUND Figure N-1 TABLE 4  DEIR Noise And Vibration TN 248288-15 – Sec 3.13.1.3 Regulatory Setting	Yes	
Appendix B (i) (2)	The name, title, phone number, address (required), and email address (if known), of an official who was contacted within each agency, and also provide the name of the official who will serve as a contact person for Commission staff.		Yes	
Appendix B (i) (3)	A schedule indicating when permits outside the authority of the commission will be obtained and the steps the applicant has taken or plans to take to obtain such permits.		Yes	

Adequacy Issue: Adequate  Inadequate   
 Technical Area: **Paleontological Resources**  
 Project Manager: Leonidas Payne

**DATA ADEQUACY WORKSHEET**  
 Project: **Fountain Wind Project**  
 Docket: 23-OPT-01

Revision No. 1 Date 1/26/2023  
 Technical Staff: Mike Turner  
 Technical Senior: Karim Abulaban

SITING REGULATIONS	INFORMATION	AFC PAGE NUMBER AND SECTION NUMBER	ADEQUATE YES OR NO	INFORMATION REQUIRED TO MAKE AFC CONFORM WITH REGULATIONS
Appendix B (g) (1)	...provide a discussion of the existing site conditions, the expected direct, indirect, and cumulative impacts due to the construction, operation and maintenance of the project, the measures proposed to mitigate adverse environmental impacts of the project, the effectiveness of the proposed measures, and any monitoring plans proposed to verify the effectiveness of the mitigation.	Existing Conditions: DEIR Section 3.9 (Geology and Soils)  1.2.3.2 Analysis of Project Changes: FEIR (Geology, Soils, and Paleontological Resources).	Yes	
Appendix B (g) (16) (A)	Identification of the physiographic province and a brief summary of the geologic setting, formations, and stratigraphy of the project area. The size of the paleontological study area may vary depending on the depositional history of the region.	Existing Conditions: DEIR Section 3.9 (Geology and Soils)  1.2.3.2 Analysis of Project Changes: FEIR (Geology, Soils, and Paleontological Resources).  DEIR 3.1.4.7 Geology and Soils	Yes	
Appendix B (g) (16) (B)	A discussion of the sensitivity of the project area described in subsection (g)(16)(A) and the presence and significance of any known paleontological localities or other paleontological resources within or adjacent to the project. Include a discussion of sensitivity for each geologic unit identified on the most recent geologic map at a scale of 1:24,000. Provide rationale as to why the sensitivity was assigned.	DEIR 3.1.4.7 Geology and Soils	Yes	

Adequacy Issue: Adequate  Inadequate   
 Technical Area: **Paleontological Resources**  
 Project Manager: Leonidas Payne

**DATA ADEQUACY WORKSHEET**  
 Project: **Fountain Wind Project**  
 Docket: 23-OPT-01

Revision No. 1 Date 1/26/2023  
 Technical Staff: Mike Turner  
 Technical Senior: Karim Abulaban

SITING REGULATIONS	INFORMATION	AFC PAGE NUMBER AND SECTION NUMBER	ADEQUATE YES OR NO	INFORMATION REQUIRED TO MAKE AFC CONFORM WITH REGULATIONS
Appendix B (g) (16) (C)	A summary of all local museums, literature searches and field surveys used to provide information about paleontological resources in the project area described in (g)(16)(A). Identify the dates of the surveys, methods used in completing the surveys, and the names and qualifications of the individuals conducting the surveys.	DEIR 3.1.4.7 Geology and Soils	Yes	
Appendix B (g) (16) (D)	Information on the specific location of known palaeontologic resources, survey reports, locality records, and maps at a scale of 1:24,000, showing occurrences of fossil finds, if known, within a 1-mile radius of the project and related facilities shall be included in a separate appendix to the Application and submitted to the Commission under a request for confidentiality, pursuant to California Code of Regulations, title 20, section 2501 et seq.	DEIR 3.1.4.7 Geology and Soils	Yes	
Appendix B (g) (16) (E)	A discussion of any educational programs proposed to enhance awareness of potential impacts to paleontological resources by employees, measures proposed for mitigation of impacts to known palaeontologic resources, and a set of contingency measures for mitigation of potential impacts to unknown paleontological resources.	N/A	Yes	



Adequacy Issue: Adequate  Inadequate   
 Technical Area: **Paleontological Resources**  
 Project Manager: Leonidas Payne

**DATA ADEQUACY WORKSHEET**  
 Project: **Fountain Wind Project**  
 Docket: 23-OPT-01

Revision No. 1 Date 1/26/2023  
 Technical Staff: Mike Turner  
 Technical Senior: Karim Abulaban

SITING REGULATIONS	INFORMATION	AFC PAGE NUMBER AND SECTION NUMBER	ADEQUATE YES OR NO	INFORMATION REQUIRED TO MAKE AFC CONFORM WITH REGULATIONS
Appendix B (i) (1) (A)	Tables that identify laws, regulations, ordinances, standards, adopted local, regional, state, and federal land use plans, leases, and permits applicable to the proposed project, and a discussion of the applicability of, and conformance with each. The table or matrix shall explicitly reference pages in the application wherein conformance, with each law or standard during both construction and operation of the facility is discussed; and	Existing Conditions: DEIR Section 3.9.1.3, includes descriptions of applicable LORS but does not mention paleontology.	Yes	N/A due to the applicants claim that rocks of igneous origins have low to no paleontological potential and sensitivity, due to the extremely high temperatures associated with the formation of the rocks and the nature of lava flows.
Appendix B (i) (1) (B)	Tables that identify each agency with jurisdiction to issue applicable permits, leases, and approvals or to enforce identified laws, regulations, standards, and adopted local, regional, state, and federal land use plans, and agencies that would have permit approval or enforcement authority, but for the exclusive authority of the Commission to certify sites and related facilities.	Existing Conditions: DEIR Section 3.9.1.3; includes descriptions of applicable LORS but does not mention paleontology.	Yes	N/A due to the applicants claim that rocks of igneous origins have low to no paleontological potential and sensitivity, due to the extremely high temperatures associated with the formation of the rocks and the nature of lava flows.
Appendix B (i) (2)	The name, title, phone number, address (required), and email address (if known), of an official who was contacted within each agency, and provide the name of the official who will serve as a contact person for Commission staff.	Existing Conditions: DEIR Section 3.9.1.3; includes descriptions of applicable LORS but does not mention paleontology.	Yes	N/A due to the applicants claim that rocks of igneous origins have low to no paleontological potential and sensitivity, due to the extremely high temperatures associated with the formation of the rocks and the nature of lava flows.

Adequacy Issue: Adequate  Inadequate   
 Technical Area: **Paleontological Resources**  
 Project Manager: Leonidas Payne

**DATA ADEQUACY WORKSHEET**  
 Project: **Fountain Wind Project**  
 Docket: 23-OPT-01

Revision No. 1 Date 1/26/2023  
 Technical Staff: Mike Turner  
 Technical Senior: Karim Abulaban

<b>SITING REGULATIONS</b>	<b>INFORMATION</b>	<b>AFC PAGE NUMBER AND SECTION NUMBER</b>	<b>ADEQUATE YES OR NO</b>	<b>INFORMATION REQUIRED TO MAKE AFC CONFORM WITH REGULATIONS</b>
Appendix B (i) (3)	A schedule indicating when permits outside the authority of the commission will be obtained and the steps the applicant has taken or plans to take to obtain such permits.	Existing Conditions: DEIR Section 3.9.1.3; includes descriptions of applicable LORS but does not mention paleontology.	Yes	N/A due to the applicants claim that rocks of igneous origins have low to no paleontological potential and sensitivity, due to the extremely high temperatures associated with the formation of the rocks and the nature of lava flows.

Issue: Adequate \_\_\_\_\_ Inadequate **X** **DATA ADEQUACY WORKSHEET** Revision No. 0 Date 1/31/2023  
 Technical Area: **Public Health** Project: Fountain Wind Project Technical Staff: Joseph Hughes  
 Project Manager: Leonidas Payne Docket: 23-OPT-01 Technical Senior: Joseph Hughes

SITING REGULATIONS	INFORMATION	AFC PAGE NUMBER AND SECTION NUMBER	ADEQUATE YES OR NO	INFORMATION REQUIRED TO MAKE AFC CONFORM WITH REGULATIONS
Appendix B (g) (1)	...provide a discussion of the existing site conditions, the expected direct, indirect and cumulative impacts due to the construction, operation and maintenance of the project, the measures proposed to mitigate adverse environmental impacts of the project, the effectiveness of the proposed measures, and any monitoring plans proposed to verify the effectiveness of the mitigation.	Shasta County DEIR, Section 3.3 Air Quality (TN 48288-5); Shasta County DEIR Appendix B Air Quality and Greenhouse Gas Emissions (TN 248291-4)	Yes	
Appendix B (g) (9) (A)	An assessment of the potential risk to human health from the project's hazardous air emissions using the Air Resources Board Hotspots Analysis and Reporting Program (HARP) (HSC sections 44360-44366) or its successor and Approved Risk Assessment Health Values. These values should include the cancer potency values and noncancer reference exposure levels approved by the Office of Environmental Health Hazard Assessment (OEHHA Guidelines, Cal-EPA 2005).	Shasta County DEIR, Section 3.3 Air Quality (TN 48288-5); Shasta County DEIR, Section 3.10 Greenhouse Gas Emissions (TN 248288-12); Shasta County DEIR Appendix B Air Quality and Greenhouse Gas Emissions (TN 248291-4)	Yes	
Appendix B (g) (9) (B)	A listing of the input data and output results, in both electronic and print formats, used to prepare the HARP health risk assessment.	N/A	Yes	
Appendix B (g) (9) (C)	Identification of available health studies through the local public health department concerning the potentially affected population(s) within a six-mile radius of the proposed power plant site related to respiratory illnesses, cancers or related diseases.	Shasta County DEIR, Section 3.3 Air Quality (TN 48288-5)	Yes	

Issue: Adequate \_\_\_\_\_ Inadequate **X** **DATA ADEQUACY WORKSHEET**  
 Technical Area: **Public Health**  
 Project Manager: Leonidas Payne

Project: Fountain Wind Project  
 Docket: 23-OPT-01  
 Revision No. 0 Date 1/31/2023  
 Technical Staff: Joseph Hughes  
 Technical Senior: Joseph Hughes

SITING REGULATIONS	INFORMATION	AFC PAGE NUMBER AND SECTION NUMBER	ADEQUATE YES OR NO	INFORMATION REQUIRED TO MAKE AFC CONFORM WITH REGULATIONS
Appendix B (g) (9) (D)	A map showing sensitive receptors within the area exposed to the substances identified in subsection (g)(9)(A).	N/A	Yes	
Appendix B (g) (9) (E)	For this section, the following definitions apply:			
Appendix B (g) (9) (E) (i)	A sensitive receptor refers to infants and children, the elderly, and the chronically ill, and any other member of the general population who is more susceptible to the effects of the exposure than the population at large;	N/A	Yes	
Appendix B (g) (9) (E) (ii)	An acute exposure is one that occurs over a time period of less than or equal to one (1) hour; and	N/A	Yes	
Appendix B (g) (9) (E) (iii)	A chronic exposure is one that is greater than twelve (12) percent of a lifetime of seventy (70) years.	N/A	Yes	
Appendix B (i) (1) (A)	Tables that identify laws, regulations, ordinances, standards, adopted local, regional, state, and federal land use plans, leases, and permits applicable to the proposed project, and a discussion of the applicability of, and conformance with each. The table or matrix shall explicitly reference pages in the application wherein conformance, with each law or standard during both construction and operation of the facility is discussed; and	Shasta County DEIR, Section 3.3 Air Quality (TN 48288-5)	Yes	

Issue: Adequate \_\_\_\_\_ Inadequate **X** **DATA ADEQUACY WORKSHEET**  
 Technical Area: **Public Health**  
 Project Manager: Leonidas Payne

Project: Fountain Wind Project  
 Docket: 23-OPT-01

Revision No. 0 Date 1/31/2023  
 Technical Staff: Joseph Hughes  
 Technical Senior: Joseph Hughes

SITING REGULATIONS	INFORMATION	AFC PAGE NUMBER AND SECTION NUMBER	ADEQUATE YES OR NO	INFORMATION REQUIRED TO MAKE AFC CONFORM WITH REGULATIONS
Appendix B (i) (1) (B)	Tables that identify each agency with jurisdiction to issue applicable permits, leases, and approvals or to enforce identified laws, regulations, standards, and adopted local, regional, state and federal land use plans, and agencies that would have permit approval or enforcement authority, but for the exclusive authority of the Commission to certify sites and related facilities.	Shasta County DEIR, Section 3.3 Air Quality (TN 48288-5)	Yes	
Appendix B (i) (2)	The name, title, phone number, address (required), and email address (if known), of an official who was contacted within each agency, and provide the name of the official who will serve as a contact person for Commission staff.	Shasta County DEIR, Section 3.3 Air Quality (TN 48288-5)	Yes	
Appendix B (i) (3)	A schedule indicating when permits outside the authority of the commission will be obtained and the steps the applicant has taken or plans to take to obtain such permits.	Shasta County DEIR, Section 3.3 Air Quality (TN 48288-5)	No	Please provide a schedule indicating when the necessary permits from the Shasta County AQMD will be obtained.

Adequacy Issue: Adequate  Inadequate   
 Technical Area: **Reliability**  
 Project Manager: Leonidas Payne

**DATA ADEQUACY WORKSHEET**  
 Project: **Fountain Wind**  
 Docket: 23-OPT-01

Revision No. 0 Date January 24, 2023  
 Technical Staff: Kenneth Salyphone  
 Technical Senior: Shahab Khoshmashrab

SITING REGULATIONS	INFORMATION	AFC PAGE NUMBER AND SECTION NUMBER	ADEQUATE YES OR NO	INFORMATION REQUIRED TO MAKE AFC CONFORM WITH REGULATIONS
Appendix B (g) (1)	...provide a discussion of the existing site conditions, the expected direct, indirect and cumulative impacts due to the construction, operation and maintenance of the project, the measures proposed to mitigate adverse environmental impacts of the project, the effectiveness of the proposed measures, and any monitoring plans proposed to verify the effectiveness of the mitigation.	Chapter 2: Description of Project Section 2.1: Project Overview Section 2.2: Project Location Section 2.4: Description of the Project Section 2.4.4.3 Operation and Maintenance Facility Section 2.4.5: Site Preparation and Construction	Y	72 wind turbine includes redundancy
Appendix B (h) (3) (A)	A discussion of the sources and availability of the fuel or fuels to be used over the estimated service life of the facilities.	Section 3.7: Energy Section 3.7.3.2: Direct and Indirect Effects of the Project Table 3.7-5: Project Energy Consumption During Operation	Y	
Appendix B (h) (3) (B)	A discussion of the anticipated service life and degree of reliability expected to be achieved by the proposed facilities on consideration of:	Section 2.4.6: Operation and Maintenance	Y	
Appendix B (h) (3) (B) (i)	Expected overall availability factor, and annual and lifetime capacity factors;	Section 3.7.3: Direct and Indirect Effects (Operation and Maintenance)	Y	The availability factor could be calculated based on expected MWh/yr. Applicant proposes 2,803 hours per year of operation. One year has 8,760 hours, therefore, availability factor = 2,803 / 8,760 = 32%

Adequacy Issue: Adequate   X   Inadequate \_\_\_\_\_  
 Technical Area:   Reliability    
 Project Manager:   Leonidas Payne  

**DATA ADEQUACY WORKSHEET**  
 Project:   Fountain Wind    
 Docket:   23-OPT-01  

Revision No.   0   Date   January 24, 2023    
 Technical Staff:   Kenneth Salyphone    
 Technical Senior:   Shahab Khoshmashrab  

SITING REGULATIONS	INFORMATION	AFC PAGE NUMBER AND SECTION NUMBER	ADEQUATE YES OR NO	INFORMATION REQUIRED TO MAKE AFC CONFORM WITH REGULATIONS
Appendix B (h) (3) (B) (ii)	The demonstrated or anticipated feasibility of the technologies, systems, components, and measures proposed to be employed in the facilities, including the power generation system, the heat dissipation system, the water supply system, the reinjection system, the atmospheric emission control system, resource conveyance lines, and the waste disposal system;	Section 2.1: Project Overview Section 2.2: Project Location Section 2.4: Description of the Project Table 2-1: Project Components Section 2.4.1: Wind Turbine Generators Section 2.4.8: Water, Wastewater, Waste, and Hazardous Materials Section 3.11: Hazardous and Hazardous Materials	Y	
Appendix B (h) (3) (B) (iii)	Geologic and flood hazards, meteorologic conditions and climatic extremes, and cooling water availability;	Section 3.9: Geology and Soils Section 3.12: Hydrology and Water Quality	Y	
Appendix B (h) (3) (B) (iv)	Special design features adopted by the applicant or resource supplier to ensure power plant reliability including equipment redundancy; and	Section 2.4.1: Wind Turbine Generators	Y	
Appendix B (h) (3) (B) (v)	For technologies not previously installed and operated in California, the expected power plant maturation period.	n/a		

Adequacy Issue: Adequate  Inadequate   
 Technical Area: Reliability  
 Project Manager: Leonidas Payne

**DATA ADEQUACY WORKSHEET**  
 Project: Fountain Wind  
 Docket: 23-OPT-01

Revision No. 0 Date January 24, 2023  
 Technical Staff: Kenneth Salyphone  
 Technical Senior: Shahab Khoshmashrab

SITING REGULATIONS	INFORMATION	AFC PAGE NUMBER AND SECTION NUMBER	ADEQUATE YES OR NO	INFORMATION REQUIRED TO MAKE AFC CONFORM WITH REGULATIONS
Appendix B (i) (1) (A)	Tables that identify laws, regulations, ordinances, standards, adopted local, regional, state, and federal land use plans, leases, and permits applicable to the proposed project, and a discussion of the applicability of, and conformance with each. The table or matrix shall explicitly reference pages in the application wherein conformance, with each law or standard during both construction and operation of the facility is discussed; and	n/a		
Appendix B (i) (1) (B)	Tables that identify each agency with jurisdiction to issue applicable permits, leases, and approvals or to enforce identified laws, regulations, standards, and adopted local, regional, state and federal land use plans, and agencies that would have permit approval or enforcement authority, but for the exclusive authority of the Commission to certify sites and related facilities.	n/a		
Appendix B (i) (2)	The name, title, phone number, address (required), and email address (if known), of an official who was contacted within each agency, and provide the name of the official who will serve as a contact person for Commission staff.	n/a		
Appendix B (i) (3)	A schedule indicating when permits outside the authority of the Commission will be obtained and the steps the applicant has taken or plans to take to obtain such permits.	n/a		



Adequacy Issue: Adequate \_\_\_\_\_ Inadequate **X**  
 Technical Area: **Socioeconomics**  
 Project Manager: Lon Payne

**DATA ADEQUACY WORKSHEET**  
 Project: **Fountain Wind Project**  
 Docket: 23-OPT-01

Revision No. \_\_\_\_\_ Date \_\_\_\_\_  
 Technical Staff: Eileen Allen, Irene Kaufman  
 Technical Senior: Steve Kerr

<b>SITING REGULATIONS</b>	<b>INFORMATION</b>	<b>AFC PAGE NUMBER AND SECTION NUMBER</b>	<b>ADEQUATE YES OR NO</b>	<b>INFORMATION REQUIRED TO MAKE AFC CONFORM WITH REGULATIONS</b>
Appendix B (g) (1)	...provide a discussion of the existing site conditions, the expected direct, indirect and cumulative impacts due to the construction, operation and maintenance of the project, the measures proposed to mitigate adverse environmental impacts of the project, the effectiveness of the proposed measures, and any monitoring plans proposed to verify the effectiveness of the mitigation.	TN 248292-2: Economic and Public Revenue Impact Study; pages 2-4 (Tables 4 and 5) TN 248293-2: CEQA Staff Report; pages 1-3, 8-10 TN 248288-17L: DEIR Utilities and Service Systems; page 12	No	<b>Please provide the cumulative impact assessment for population/housing, recreation, and public services.</b> A discussion of the cumulative impacts for Utilities and Service Systems has been provided. Please provide similar detail for cumulative analyses of other socioeconomic sections (i.e., population/housing, recreation, and public services) based on an up-to-date cumulative scenario.
Appendix B (g) (7) (A)	A description of the socioeconomic circumstances of the vicinity and region affected by construction and operation of the project. Include:	TN 248293-2: CEQA Staff Report; pages 8-9 TN 248320-2: Figure – Disadvantaged Communities	No	<b>See below.</b>
Appendix B (g) (7) (A) (i)	The economic characteristics, including the economic base, fiscal resources, and a list of the applicable local agencies with taxing powers and their most recent and projected revenues;		No	<b>Please provide a discussion of economic base, fiscal resources, and a list of the applicable local agencies with taxing powers and their most recent and projected revenues.</b>
Appendix B (g) (7) (A) (ii)	The social characteristics, including population and demographic and community trends;	TN 248288-3 : DEIR Intro Environmental Analysis; page 21 TN 248320-2: Figure – Disadvantaged Communities	No	<b>Please provide discission of demographic and community trends, including the following:</b> <ul style="list-style-type: none"><li>• Provide the low-income population percentage living in the county and communities closest to project site.</li></ul>

Adequacy Issue: Adequate \_\_\_\_\_ Inadequate  X   
 Technical Area:  Socioeconomics   
 Project Manager:  Lon Payne

**DATA ADEQUACY WORKSHEET**  
 Project:  Fountain Wind Project   
 Docket:  23-OPT-01

Revision No. \_\_\_\_\_ Date \_\_\_\_\_  
 Technical Staff:  Eileen Allen, Irene Kaufman   
 Technical Senior:  Steve Kerr

SITING REGULATIONS	INFORMATION	AFC PAGE NUMBER AND SECTION NUMBER	ADEQUATE YES OR NO	INFORMATION REQUIRED TO MAKE AFC CONFORM WITH REGULATIONS
				<ul style="list-style-type: none"> <li>Provide the minority population percentage living in the county and communities closest to project site.</li> </ul> <p>A figure for disadvantaged communities is provided but information on the population percentages or the number of people included in the highlighted regions is not provided. Please provide this information.</p>
Appendix B (g) (7) (A) (iii)	Existing unemployment rates;	TN 248288-3 DEIR Intro Environmental Analysis; page 21	Yes	
Appendix B (g) (7) (A) (iv)	Availability of skilled workers by craft required for construction and operation of the project;	TN 248288-3: DEIR Intro Environmental Analysis; page 21  TN 248292-2: Economic and Public Revenue Impact Study; page 7	No	<p><b>Please provide information on the skilled workers by craft required for construction.</b> Please include the specific job types and number anticipated for construction and operation.</p> <p><b>Please provide information on the county's availability for each type of skilled worker, or where this labor force is anticipated to come from and the associated commute shed for the labor force.</b></p>
Appendix B (g) (7) (A) (v)	Availability of temporary and permanent housing and current vacancy rate; and	TN 248288-3: DEIR Intro Environmental Analysis; page 21	Yes	
Appendix B (g) (7) (A) (vi)	Capacities, existing and expected use levels, and planned expansion of utilities (gas, water and waste) and public services, including fire protection, law enforcement, emergency response, medical facilities, other assessment	TN 248288-3: DEIR Intro Environmental Analysis; pages 22-26	No	<p><b>Please provide response time goals/capacities/ability to meet response goals for public safety.</b> Please provide a discussion with level of detail similar to that</p>

Adequacy Issue: Adequate \_\_\_\_\_ Inadequate **X**  
 Technical Area: **Socioeconomics**  
 Project Manager: Lon Payne

**DATA ADEQUACY WORKSHEET**  
 Project: **Fountain Wind Project**  
 Docket: 23-OPT-01

Revision No. \_\_\_\_\_ Date \_\_\_\_\_  
 Technical Staff: Eileen Allen, Irene Kaufman  
 Technical Senior: Steve Kerr

SITING REGULATIONS	INFORMATION	AFC PAGE NUMBER AND SECTION NUMBER	ADEQUATE YES OR NO	INFORMATION REQUIRED TO MAKE AFC CONFORM WITH REGULATIONS
	districts, and school districts. For projects outside metropolitan areas with a population of 500,000 or more, information for each school district shall include current enrollment and yearly expected enrollment by grade level groupings, excluding project-related changes for the duration of the project schedule.	TN 248322: Executive Summary and Project Description; pages 14-15  TN 248288-2: DEIR Description of Project and Alternatives; pages 24-25		provided for utilities for the fire protection, law enforcement, and medical facilities.
Appendix B (g) (7) (B)	A discussion of the socioeconomic impacts caused by the construction and operation of the project (note year of estimate, model, if used, and appropriate sources), including:	TN 248292-2: Economic and Public Revenue Impact Study; page 5	Yes	
Appendix B (g) (7) (B) (i)	An estimate of the number of workers to be employed each month by craft during construction, and for operations, an estimate of the number of permanent operations workers during a year;	TN 248292-2: Economic and Public Revenue Impact Study; pages 2, 4, 7  TN 248288-3: DEIR Intro Environmental Analysis; page 21  TN 248322: Executive Summary and Project Description; page 12-13	No	<p><b>Please clarify the estimated number of workers to be employed during construction and by year during operations.</b></p> <p>Please provide the number of operation-related jobs (several different numbers such as 8, 12, or 42 have been provided in different docketed files). Table 1 in the Economic and Public Revenue Impact Study assumes that there will be 42 annual operations jobs. However, page 4 estimates 8 full-time employees throughout the project lifetime. Page 13 of the Executive summary and project description states the project operation would require up to 12 full-time employees.</p> <p>Page 4 of the Economic and Public Revenue Impact Study states there will be a peak of 200 workers/month and an average of 71 full time workers each year during the construction</p>

Adequacy Issue: Adequate \_\_\_\_\_ Inadequate **X**  
 Technical Area: **Socioeconomics**  
 Project Manager: Lon Payne

**DATA ADEQUACY WORKSHEET**  
 Project: **Fountain Wind Project**  
 Docket: 23-OPT-01

Revision No. \_\_\_\_\_ Date \_\_\_\_\_  
 Technical Staff: Eileen Allen, Irene Kaufman  
 Technical Senior: Steve Kerr

SITING REGULATIONS	INFORMATION	AFC PAGE NUMBER AND SECTION NUMBER	ADEQUATE YES OR NO	INFORMATION REQUIRED TO MAKE AFC CONFORM WITH REGULATIONS
				<p>phase. Page 12 of the Executive Summary and Project Description states that the project would require up to 400 workers.</p> <p><b>Please include the estimated number of workers by month and specific craft to be employed each month during construction and by year during operations.</b></p>
Appendix B (g) (7) (B) (ii)	An estimate of the percentage of non-local workers who will relocate to the project area to work on the project;	TN 248288-3: DEIR Intro Environmental Analysis; page 21	Yes	
Appendix B (g) (7) (B) (iii)	An estimate of the potential population increase caused directly and indirectly by the project;	TN 248288-3: DEIR Intro Environmental Analysis; page 21	Yes	
Appendix B (g) (7) (B) (iv)	The potential impact of population increase on housing during the construction and operations phases;	TN 248288-3: DEIR Intro Environmental Analysis; page 21	Yes	
Appendix B (g) (7) (B) (v)	The potential impacts, including additional costs, on utilities (gas, water, and waste) and public services, including fire, law enforcement, emergency response, medical facilities, other assessment districts, and school districts. Include response times to hospitals and for police, and emergency services. For projects outside metropolitan areas with a population of 500,000 or more, information on schools shall include project-related enrollment changes by grade level groupings and associated facility and staffing impacts by school district during the construction and operating phases;	TN 248288-3: DEIR Intro Environmental Analysis; pages 22-26  TN 248322: Executive Summary and Project Description; page 15  TN 248288-17: DEIR Utilities and Service Systems; pages 3.15-2, 3.15-9	No	<p><b>Please provide current response times to hospitals and for police and emergency services.</b> Please provide a discussion with level of detail similar to that provided for utilities for the response times for fire protection, law enforcement, and medical facilities. Please include a discussion of the potential impacts.</p>

Adequacy Issue: Adequate \_\_\_\_\_ Inadequate  X   
 Technical Area:  Socioeconomics   
 Project Manager:  Lon Payne

**DATA ADEQUACY WORKSHEET**  
 Project:  Fountain Wind Project   
 Docket:  23-OPT-01

Revision No. \_\_\_\_\_ Date \_\_\_\_\_  
 Technical Staff:  Eileen Allen, Irene Kaufman   
 Technical Senior:  Steve Kerr

SITING REGULATIONS	INFORMATION	AFC PAGE NUMBER AND SECTION NUMBER	ADEQUATE YES OR NO	INFORMATION REQUIRED TO MAKE AFC CONFORM WITH REGULATIONS
Appendix B (g) (7) (B) (vi)	An estimate of applicable school impact fees;	No docketed files provided	No	<b>This data was not found. If not applicable, explain why.</b>
Appendix B (g) (7) (B) (vii)	An estimate of the total construction payroll and separate estimates of the total operation payroll for permanent and short-term (contract) operations employees;	TN 248292-2: Economics Memo; page 2 (Table 1), Table A-3	No	<p><b>Please confirm if the estimate of construction payroll and operation payroll is based on the correct number of workers.</b> Table 1 in the Economic and Public Revenue Impact Study assumes that there will be 42 annual operations jobs. However, page 4 estimates 8 full-time employees throughout the project lifetime. Page 13 of the Executive summary and project description states the project operation would require up to 12 full-time employees.</p> <p>Page 4 of the Economic and Public Revenue Impact Study states there will be a peak of 200 workers/month and an average of 71 full time workers each year during the construction phase. Page 12 of the Executive Summary and Project Description states that the project would require up to 400 workers.</p>
Appendix B (g) (7) (B) (viii)	An estimate of the expenditures for locally purchased materials for the construction and operation phases of the project;	TN 248292-2: Economics Memo; Table A-1	Yes	
Appendix B (g) (7) (B) (ix)	An estimate of the capital cost (plant and equipment) of the project;	No docketed files provided	No	<b>Please provide an estimate of the capital cost (plant and equipment) of the project.</b>
Appendix B (g) (7) (B) (x)	An estimate of sales taxes generated during construction and separately during an operational year of the project;	TN 248292-2: Economics Memo; Table A-1	Yes	

Adequacy Issue: Adequate \_\_\_\_\_ Inadequate **X**  
 Technical Area: **Socioeconomics**  
 Project Manager: Lon Payne

**DATA ADEQUACY WORKSHEET**  
 Project: **Fountain Wind Project**  
 Docket: 23-OPT-01

Revision No. \_\_\_\_\_ Date \_\_\_\_\_  
 Technical Staff: Eileen Allen, Irene Kaufman  
 Technical Senior: Steve Kerr

SITING REGULATIONS	INFORMATION	AFC PAGE NUMBER AND SECTION NUMBER	ADEQUATE YES OR NO	INFORMATION REQUIRED TO MAKE AFC CONFORM WITH REGULATIONS
Appendix B (g) (7) (B) (xi)	An estimate of property taxes generated during an operational year of the project; and	TN 248292-2: Economics Memo; Table A-2	Yes	
Appendix B (g) (7) (B) (xii)	The expected direct, indirect, and induced income and employment effects due to construction, operation, and maintenance of the project.	TN 248292-2: Economics Memo; page 2 (Table 1), page 7 (Tables 4 and 5)	No	<p><b>Please confirm that the model used to predict the expected direct, indirect, and induced income and employment effects due to construction, operation, and maintenance of the project is based on the correct employment assumptions.</b> Table 1 in the Economic and Public Revenue Impact Study assumes that there will be 42 annual operations jobs. However, page 4 and Table 5 estimate 8 full-time employees throughout the project lifetime. Page 13 of the Executive summary and project description states the project operation would require up to 12 full-time employees.</p> <p>Page 4 of the Economic and Public Revenue Impact Study states there will be a peak of 200 workers/month and an average of 71 full time workers each year during the construction phase. Page 12 of the Executive Summary and Project Description states that the project would require up to 400 workers.</p>
Appendix B (i) (1) (A)	Tables that identify laws, regulations, ordinances, standards, adopted local, regional, state, and federal land use plans, leases, and permits applicable to the proposed project, and a discussion of the applicability of, and conformance with each. The table or matrix shall explicitly reference pages in the application wherein conformance, with each law	TN 248290: Labor Regs Consistency Matrix	No	<p><b>The Law, Ordinance, Regulation, or Standard Consistency Matrix (TN 248290) does not identify the specific Shasta County Code ordinances or standards that are applicable during construction and operation of the proposed facility.</b></p>

Adequacy Issue: Adequate \_\_\_\_\_ Inadequate  X   
 Technical Area:  Socioeconomics   
 Project Manager:  Lon Payne

**DATA ADEQUACY WORKSHEET**  
 Project:  Fountain Wind Project   
 Docket:  23-OPT-01

Revision No. \_\_\_\_\_ Date \_\_\_\_\_  
 Technical Staff:  Eileen Allen, Irene Kaufman   
 Technical Senior:  Steve Kerr

SITING REGULATIONS	INFORMATION	AFC PAGE NUMBER AND SECTION NUMBER	ADEQUATE YES OR NO	INFORMATION REQUIRED TO MAKE AFC CONFORM WITH REGULATIONS
	or standard during both construction and operation of the facility is discussed; and			
Appendix B (i) (1) (B)	Tables that identify each agency with jurisdiction to issue applicable permits, leases, and approvals or to enforce identified laws, regulations, standards, and adopted local, regional, state and federal land use plans, and agencies that would have permit approval or enforcement authority, but for the exclusive authority of the Commission to certify sites and related facilities.	TN 248322: Executive Summary and Project Description; pages 16-17 (Table 3)	Yes	
Appendix B (i) (2)	The name, title, phone number, address (required), and email address (if known), of an official who was contacted within each agency, and provide the name of the official who will serve as a contact person for Commission staff.	<p><b>NOT DOCKETED:</b>            Fountain Wind Project Draft EIR Chapter 5 (Report Preparation), Section 5.4 (Entities Consulted and Recipients of the Draft EIR and/or the Notice of Availability), pages 5-3 to 5-5</p> <p><b>File was obtained from the following site:</b>  <a href="https://www.shastacounty.gov/planning/page/draft-eir-fountain-wind-project">https://www.shastacounty.gov/planning/page/draft-eir-fountain-wind-project</a></p>	No	<p><b>Please provide agency contact information. The DEIR list of federal, state, and local agencies consulted does not include the contact's phone number, address, or email address. The list does not indicate who should serve as the contact person for Commission staff.</b></p>
Appendix B (i) (3)	A schedule indicating when permits outside the authority of the Commission will be obtained and the steps the applicant has taken or plans to take to obtain such permits.	TN 248322: Executive Summary and Project Description; Section 5 (Project Permits), Table 3	No	<p><b>Please provide schedule for obtaining permits.</b> The "List of Potential Permits and Status" provided in Table 3 does not identify the steps involved or the schedule for obtaining the</p>

Adequacy Issue: Adequate \_\_\_\_\_ Inadequate **X**  
 Technical Area: **Socioeconomics**  
 Project Manager: Lon Payne

**DATA ADEQUACY WORKSHEET**  
 Project: **Fountain Wind Project**  
 Docket: 23-OPT-01

Revision No. \_\_\_\_\_ Date \_\_\_\_\_  
 Technical Staff: Eileen Allen, Irene Kaufman  
 Technical Senior: Steve Kerr

<b>SITING REGULATIONS</b>	<b>INFORMATION</b>	<b>AFC PAGE NUMBER AND SECTION NUMBER</b>	<b>ADEQUATE YES OR NO</b>	<b>INFORMATION REQUIRED TO MAKE AFC CONFORM WITH REGULATIONS</b>
		(List of Potential Permits and Status), pages 16 to 17		permits that are outside the authority of the commission.



Adequacy Issue: Adequate \_\_\_\_\_ Inadequate **X**  
 Technical Area: **Soils**  
 Project Manager: Lon Payne

**DATA ADEQUACY WORKSHEET**  
 Project: **Fountain Wind Project**  
 Docket: 23-OPT-01

Revision No. \_\_\_\_\_ Date 2/1/2023  
 Technical Staff: James Ackerman  
 Technical Senior: Karim Abulaban

SITING REGULATIONS	INFORMATION	AFC PAGE NUMBER AND SECTION NUMBER	ADEQUATE YES OR NO	INFORMATION REQUIRED TO MAKE AFC CONFORM WITH REGULATIONS
Appendix B (g) (1)	...provide a discussion of the existing site conditions, the expected direct, indirect and cumulative impacts due to the construction, operation and maintenance of the project, the measures proposed to mitigate adverse environmental impacts of the project, the effectiveness of the proposed measures, and any monitoring plans proposed to verify the effectiveness of the mitigation.	Section 3.15.3.2, <i>Direct and Indirect Effects of the Project</i> Page: 3.15-7	Yes	
Appendix B (g) (15) (A)	A map at a scale of 1:24,000 and written description of soil types and all agricultural land uses that will be affected by the proposed project. The description shall include:		No	There does not appear to be text or a map addressing soil types and agricultural land used in Section 3.9 <i>Geology and Soils</i>
Appendix B (g) (15) (A) (i)	The depth, texture, permeability, drainage, erosion hazard rating, and land capability class of the soil;		No	Map addressing erodibility of soil in Section 3.9 <i>Geology and Soils</i>
Appendix B (g) (15) (A) (ii)	An identification of other physical and chemical characteristics of the soil necessary to allow an evaluation of soil erodibility, permeability, re-vegetation potential, and cycling of pollutants in the soil-vegetation system;	Figure 3.9-2 <i>Corrosion of Concrete and Steel</i>	No	Map addressing physical and chemical characteristics of soil
Appendix B (g) (15) (A) (iii)	The location of any proposed fill disposal or fill procurement (borrow) sites; and			
Appendix B (g) (15) (A) (iv)	The location of any contaminated soils that could be disturbed by project construction.	EDR Database Search Results (TN 248290-2)	Yes	
Appendix B (g) (15) (B)	An assessment of the effects of the proposed project on soil resources and agricultural land uses. This discussion shall include:		No	Discussion of the impact to soil with respect to agricultural land use
Appendix B (g) (15) (B) (i)	The quantification of accelerated soil loss due to wind and water erosion; and		No	Discussion of the impact to soil with respect to agricultural land use

Adequacy Issue: Adequate \_\_\_\_\_ Inadequate **X**  
 Technical Area: **Soils**  
 Project Manager: Lon Payne

**DATA ADEQUACY WORKSHEET**  
 Project: **Fountain Wind Project**  
 Docket: 23-OPT-01

Revision No. \_\_\_\_\_ Date 2/1/2023  
 Technical Staff: James Ackerman  
 Technical Senior: Karim Abulaban

SITING REGULATIONS	INFORMATION	AFC PAGE NUMBER AND SECTION NUMBER	ADEQUATE YES OR NO	INFORMATION REQUIRED TO MAKE AFC CONFORM WITH REGULATIONS
Appendix B (g) (15) (B) (ii)	The effect of power plant emissions on surrounding soil-vegetation systems.			
Appendix B (i) (1) (A)	Tables that identify laws, regulations, ordinances, standards, adopted local, regional, state, and federal land use plans, leases, and permits applicable to the proposed project, and a discussion of the applicability of, and conformance with each. The table or matrix shall explicitly reference pages in the application wherein conformance, with each law or standard during both construction and operation of the facility is discussed; and		No	Table of LORS
Appendix B (i) (1) (B)	Tables that identify each agency with jurisdiction to issue applicable permits, leases, and approvals or to enforce identified laws, regulations, standards, and adopted local, regional, state and federal land use plans, and agencies that would have permit approval or enforcement authority, but for the exclusive authority of the Commission to certify sites and related facilities.			
Appendix B (i) (2)	The name, title, phone number, address (required), and email address (if known), of an official who was contacted within each agency, and provide the name of the official who will serve as a contact person for Commission staff.			
Appendix B (i) (3)	A schedule indicating when permits outside the authority of the Commission will be obtained and the steps the applicant has taken or plans to take to obtain such permits.		No	Schedule of permit issuance

Adequacy Issue: Adequate \_\_\_\_\_ Inadequate **X**  
 Technical Area: **Trans Line Safety & Nuisance**  
 Project Manager: Leonidas Payne

**DATA ADEQUACY WORKSHEET**  
 Project: **Fountain Wind Project**  
 Docket: 23-OPT-01

Revision No. 0 Date 2/1/2023  
 Technical Staff: Joseph Hughes  
 Technical Senior: Joseph Hughes

SITING REGULATIONS	INFORMATION	AFC PAGE NUMBER AND SECTION NUMBER	ADEQUATE YES OR NO	INFORMATION REQUIRED TO MAKE AFC CONFORM WITH REGULATIONS
Appendix B (g) (1)	...provide a discussion of the existing site conditions, the expected direct, indirect and cumulative impacts due to the construction, operation and maintenance of the project, the measures proposed to mitigate adverse environmental impacts of the project, the effectiveness of the proposed measures, and any monitoring plans proposed to verify the effectiveness of the mitigation.	Executive Summary and Project Description (TN 248322)	Yes	
Appendix B (g) (18) (A)	The locations and a description of the existing switchyards and overhead and underground transmission lines that would be affected by the proposed project.	Executive Summary and Project Description (TN 248322), Figure - Parcels within 1000 ft (TN 248296-10),	Yes	
Appendix B (g) (18) (B)	An estimate of the existing electric and magnetic fields from the facilities listed in (A) above and the future electric and magnetic fields that would be created by the proposed project, calculated at the property boundary of the site and at the edge of the rights of way for any transmission line. Also provide an estimate of the radio and television interference that could result from the project.	Executive Summary and Project Description (TN 248322); DEIR Communications Interference (TN 248288-7)	No	Please provide the information required by Appendix B (g)(18)(B) for the onsite 34.5-kilovolt (kV) overhead electrical systems used to connect turbines together, the on-site switching station used to connect the project to the existing grid, and any other transmission lines or project components that could contribute to electric and magnetic fields.
Appendix B (g) (18) (C)	Specific measures proposed to mitigate identified impacts, including a description of measures proposed to eliminate or reduce radio and television interference, and all measures taken to reduce electric and magnetic field levels.	Executive Summary and Project Description (TN 248322); DEIR Communications Interference (TN 248288-7)	No	Please provide the information required by Appendix B (g)(18)(C)

Adequacy Issue: Adequate \_\_\_\_\_ Inadequate **X**  
 Technical Area: **Trans Line Safety & Nuisance**  
 Project Manager: Leonidas Payne

**DATA ADEQUACY WORKSHEET**  
 Project: **Fountain Wind Project**  
 Docket: 23-OPT-01

Revision No. 0 Date 2/1/2023  
 Technical Staff: Joseph Hughes  
 Technical Senior: Joseph Hughes

SITING REGULATIONS	INFORMATION	AFC PAGE NUMBER AND SECTION NUMBER	ADEQUATE YES OR NO	INFORMATION REQUIRED TO MAKE AFC CONFORM WITH REGULATIONS
Appendix B (i) (1) (A)	Tables that identify laws, regulations, ordinances, standards, adopted local, regional, state, and federal land use plans, leases, and permits applicable to the proposed project, and a discussion of the applicability of, and conformance with each. The table or matrix shall explicitly reference pages in the application wherein conformance, with each law or standard during both construction and operation of the facility is discussed; and	Executive Summary and Project Description (TN 248322); DEIR Communications Interference (TN 248288-7)	Yes	
Appendix B (i) (1) (B)	Tables that identify each agency with jurisdiction to issue applicable permits, leases, and approvals or to enforce identified laws, regulations, standards, and adopted local, regional, state and federal land use plans, and agencies that would have permit approval or enforcement authority, but for the exclusive authority of the Commission to certify sites and related facilities.	Executive Summary and Project Description (TN 248322)	Yes	
Appendix B (i) (2)	The name, title, phone number, address (required), and email address (if known), of an official who was contacted within each agency, and provide the name of the official who will serve as a contact person for Commission staff.	N/A	Yes	
Appendix B (i) (3)	A schedule indicating when permits outside the authority of the Commission will be obtained and the steps the applicant has taken or plans to take to obtain such permits.	N/A	Yes	

Adequacy Issue: Adequate \_\_\_\_\_ Inadequate **X** **DATA ADEQUACY WORKSHEET** Revision No. \_\_\_\_\_ Date \_\_\_\_\_  
 Technical Area: **Traffic and Transportation** Project: **Fountain Wind Project** Technical Staff: David Robinson, Adrita Islam  
 Project Manager: Lon Payne Docket: 23-OPT-01 Technical Senior: Steven Kerr

SITING REGULATIONS	INFORMATION	AFC PAGE NUMBER AND SECTION NUMBER	ADEQUATE YES OR NO	INFORMATION REQUIRED TO MAKE AFC CONFORM WITH REGULATIONS
Appendix B (g) (1)	...provide a discussion of the existing site conditions, the expected direct, indirect and cumulative impacts due to the construction, operation and maintenance of the project, the measures proposed to mitigate adverse environmental impacts of the project, the effectiveness of the proposed measures, and any monitoring plans proposed to verify the effectiveness of the mitigation.	TN 248288-16: DEIR Transportation; Section 3.14.3.2, Pages 3.14-10 – 3.14-16  TN 248288-14: DEIR Greenhouse Gas Emissions; Section 3.10.3.2, Pages 3.10-17 – 3.14-19  <b>NOT DOCKETED:</b> Fountain Wind Project Draft EIR Appendix H (Transportation), Westwood Traffic Study, Fountain Wind Power, Shasta County, California, February 11, 2020, Page 17  <b>File was obtained from the following site on 1/30/2023:</b> <a href="https://www.shastacounty.gov/sites/default/files/fileattachments/planning/page/3361/appendix_h_transportation.pdf">https://www.shastacounty.gov/sites/default/files/fileattachments/planning/page/3361/appendix_h_transportation.pdf</a>	No	<b>Please expand the analysis of Impact 3.14-2.</b> Impact 3.14-2 of Section 3.14.3 (Direct and Indirect Effects) presents the analysis of the project relative to CEQA Guidelines Section 15064.3(b), which relates to the evaluation of a project’s transportation impacts. Specifically, analysis using vehicle miles of travel (VMT) is identified as the most appropriate measure for the analysis of transportation impacts. The analysis of Impact 3.14-2 relies on GHG analysis in Section 3.10, GHG Emissions, since the intent of SB 743 is to encourage land use and transportation planning decisions and investments that reduce VMT, thereby reducing GHG emissions. As explained in Section 3.14-2, absent an adopted VMT threshold, the County decided to rely on an established environmental standard that is protective of resources of legislative concern. The less-than-significant impact finding is in part a result of a potential net offset of annual CO <sub>2</sub> e emissions with implementation (i.e., due to ongoing power generation). The VMT analysis demonstrates that the project will result in a short-term increase in VMT during construction. However, no discussion or analysis is presented of potential TDM strategies (carpooling, ridesharing, etc) or other measures that could be implemented to reduce VMT during construction, although identified in Appendix H, Page 17.

Adequacy Issue: Adequate \_\_\_\_\_ Inadequate **X** **DATA ADEQUACY WORKSHEET** Revision No. \_\_\_\_\_ Date \_\_\_\_\_  
 Technical Area: **Traffic and Transportation** Project: **Fountain Wind Project** Technical Staff: David Robinson, Adrita Islam  
 Project Manager: Lon Payne Docket: 23-OPT-01 Technical Senior: Steven Kerr

<b>SITING REGULATIONS</b>	<b>INFORMATION</b>	<b>AFC PAGE NUMBER AND SECTION NUMBER</b>	<b>ADEQUATE YES OR NO</b>	<b>INFORMATION REQUIRED TO MAKE AFC CONFORM WITH REGULATIONS</b>
Appendix B (g) (5) (A)	A regional transportation setting, on topographic maps (scale of 1:250,000), identifying the project location and major transportation facilities. Include a reference to the transportation element of any applicable local or regional plan.	TN 248288-16: DEIR Transportation; Section 3.14.1.3 (Regulatory Setting), Page 3.14-5  TN 248320-3-16: Traffic Report; Page 8 (Exhibit 1)  <b>NOT DOCKETED:</b> Fountain Wind Project Draft EIR Appendix H (Transportation), Westwood Traffic Study, Fountain Wind Power, Shasta County, California, February 11, 2020, Page 20 (Exhibit 1)  <b>File was obtained from the following site on 1/30/2023:</b> <a href="https://www.shastacounty.gov/sites/default/files/fileattachments/planning/page/3361/appendix_h_transportation.pdf">https://www.shastacounty.gov/sites/default/files/fileattachments/planning/page/3361/appendix_h_transportation.pdf</a>	No	<b>Please update Section 3.14.1.3 (Regulatory Setting) of the DEIR Transportation Section.</b> The Regulatory Setting should include reference to the Regional Transportation Plan & Sustainable Communities Strategy for the Shasta Region and Caltrans Transportation Concept Reports for each State route in the study area.  Also please verify the scale of Exhibit 1 of the Traffic report.

Adequacy Issue: Adequate \_\_\_\_\_ Inadequate **X** **DATA ADEQUACY WORKSHEET**  
 Technical Area: **Traffic and Transportation** Project: **Fountain Wind Project**  
 Project Manager: Lon Payne Docket: 23-OPT-01

Revision No. \_\_\_\_\_ Date \_\_\_\_\_  
 Technical Staff: David Robinson, Adrita Islam  
 Technical Senior: Steven Kerr

SITING REGULATIONS	INFORMATION	AFC PAGE NUMBER AND SECTION NUMBER	ADEQUATE YES OR NO	INFORMATION REQUIRED TO MAKE AFC CONFORM WITH REGULATIONS
Appendix B (g) (5) (B)	If the proposed project including any linear facility is to be located within 20,000 feet of an airport runway that is at least 3,200 feet in actual length, or 5,000 feet of a heliport (or planned or proposed airport runway or an airport runway under construction, that is the subject of a notice or proposal on file with the Federal Aviation Administration), discuss the project's compliance with the applicable sections of the current Federal Aviation Regulation Part 77 – Objects Affecting Navigable Airspace, specifically any potential to obstruct or impede air navigation generated by the project at operation; such as, a thermal plume, a visible water vapor plume, glare, electrical interference, or surface structure height. The discussion should include a map at a scale of 1:24,000 that displays the airport or airstrip runway configuration, the proposed power plant site and related facilities.	TN 248288-16: DEIR Transportation; Section 3.14.1.2 (Environmental Setting), Page 3.14-4  TN 248290-4: FAA Determination of No Hazard  TN 248320-3-16: Traffic Report; Page 8 (Exhibit 1)  <b>NOT DOCKETED:</b> Fountain Wind Project Draft EIR Appendix H (Transportation), Westwood Traffic Study, Fountain Wind Power, Shasta County, California, February 11, 2020, Page 20 (Exhibit 1)  <b>File was obtained from the following site on 1/30/2023:</b> <a href="https://www.shastacounty.gov/sites/default/files/fileattachments/planning/page/3361/appendix_h_transportation.pdf">https://www.shastacounty.gov/sites/default/files/fileattachments/planning/page/3361/appendix_h_transportation.pdf</a>	Yes	

Adequacy Issue: Adequate \_\_\_\_\_ Inadequate **X** **DATA ADEQUACY WORKSHEET**  
 Technical Area: **Traffic and Transportation** Project: **Fountain Wind Project**  
 Project Manager: Lon Payne Docket: 23-OPT-01

Revision No. \_\_\_\_\_ Date \_\_\_\_\_  
 Technical Staff: David Robinson, Adrita Islam  
 Technical Senior: Steven Kerr

<b>SITING REGULATIONS</b>	<b>INFORMATION</b>	<b>AFC PAGE NUMBER AND SECTION NUMBER</b>	<b>ADEQUATE YES OR NO</b>	<b>INFORMATION REQUIRED TO MAKE AFC CONFORM WITH REGULATIONS</b>
Appendix B (g) (5) (C)	An identification, on topographic maps at a scale of 1:24,000, and a description of existing and planned roads, rail lines, (including light rail), bike trails, airports, bus routes serving the project vicinity, pipelines, and canals in the project area affected by or serving the proposed facility. For each road identified, include the following, where applicable:	TN 248288-16: DEIR Transportation; Section 3.14.1.2 (Environmental Setting), Page 3.14-2  TN 248320-3-16: Traffic Report, Page 1-2  <b>NOT DOCKETED:</b> Fountain Wind Project Draft EIR Appendix H (Transportation), Westwood Traffic Study, Fountain Wind Power, Shasta County, California, February 11, 2020, Page 1-2  <b>File was obtained from the following site on 1/30/2023:</b> <a href="https://www.shastacounty.gov/sites/default/files/fileattachments/planning/page/3361/appendix_h_transportation.pdf">https://www.shastacounty.gov/sites/default/files/fileattachments/planning/page/3361/appendix_h_transportation.pdf</a>	No	<b>Please expand the description of regional and local roadways affected and/or serving the proposed project.</b> For logical study segments, the descriptions should summarize the roadway functional classification number of directional travel lanes, posted speed limits, average daily traffic volumes served, applicable weight restrictions, and truck route designation.  Also please verify the scale of Exhibit 1 of the Traffic report.



Adequacy Issue: Adequate \_\_\_\_\_ Inadequate **X** **DATA ADEQUACY WORKSHEET** Revision No. \_\_\_\_\_ Date \_\_\_\_\_  
 Technical Area: **Traffic and Transportation** Project: **Fountain Wind Project** Technical Staff: David Robinson, Adrita Islam  
 Project Manager: Lon Payne Docket: 23-OPT-01 Technical Senior: Steven Kerr

SITING REGULATIONS	INFORMATION	AFC PAGE NUMBER AND SECTION NUMBER	ADEQUATE YES OR NO	INFORMATION REQUIRED TO MAKE AFC CONFORM WITH REGULATIONS
Appendix B (g) (5) (C) (i)	Road classification and design capacity;	TN 248288-16: DEIR Transportation; Section 3.14.1.2 (Environmental Setting), Page 3.14-4 (Table 3.14-2)  <b>NOT DOCKETED:</b> Fountain Wind Project Draft EIR Appendix H (Transportation), Westwood Traffic Study, Fountain Wind Power, Shasta County, California, February 11, 2020, Page 2-3.  <b>File was obtained from the following site on 1/30/2023:</b> <a href="https://www.shastacounty.gov/sites/default/files/fileattachments/planning/page/3361/appendix_h_transportation.pdf">https://www.shastacounty.gov/sites/default/files/fileattachments/planning/page/3361/appendix_h_transportation.pdf</a>	No	<b>Please update the capacities documented in Table 3.14-2.</b> The hourly capacities presented are base capacity values, representative of ideal conditions. Base capacities do not account for the impacts of heavy vehicles, grades or other sources of friction that will lower the capacity of a freeway or highway lane.

Adequacy Issue: Adequate \_\_\_\_\_ Inadequate **X** **DATA ADEQUACY WORKSHEET**  
 Technical Area: **Traffic and Transportation** Project: **Fountain Wind Project**  
 Project Manager: Lon Payne Docket: 23-OPT-01

Revision No. \_\_\_\_\_ Date \_\_\_\_\_  
 Technical Staff: David Robinson, Adrita Islam  
 Technical Senior: Steven Kerr

<b>SITING REGULATIONS</b>	<b>INFORMATION</b>	<b>AFC PAGE NUMBER AND SECTION NUMBER</b>	<b>ADEQUATE YES OR NO</b>	<b>INFORMATION REQUIRED TO MAKE AFC CONFORM WITH REGULATIONS</b>
Appendix B (g) (5) (C) (ii)	Current daily average and peak traffic counts;	TN 248288-16: DEIR Transportation; Section 3.14.1.2 (Environmental Setting), Page 3.14-2 – 3.14-4, (Table 3.14-1 and Table 3.14-2)  TN 248320-3-16: Traffic Report, Page 8 (Exhibit 2)  <b>NOT DOCKETED:</b> Fountain Wind Project Draft EIR Appendix H (Transportation), Westwood Traffic Study, Fountain Wind Power, Shasta County, California, February 11, 2020, Page 2-3, Page 21-22 (Exhibit 2)  <b>File was obtained from the following site on 1/30/2023:</b> <a href="https://www.shastacounty.gov/sites/default/files/fileattachments/planning/page/3361/appendix_h_transportation.pdf">https://www.shastacounty.gov/sites/default/files/fileattachments/planning/page/3361/appendix_h_transportation.pdf</a>	No	<b>Please collect new average daily vehicle traffic counts.</b> Traffic data from Caltrans Traffic Census Program, representing 2017 conditions, is documented. The data provided through the Caltrans Traffic Census Program are traffic volume estimates and not actual counts. In addition, the data is pre COVID-19 Pandemic and does not capture post pandemic changes in travel behavior. 24-hour vehicle classification traffic counts should be collected (in 15-minute increments) for a minimum three days (Tuesday, Wednesday, Thursday), during a representative time of year.

Adequacy Issue: Adequate \_\_\_\_\_ Inadequate **X** **DATA ADEQUACY WORKSHEET** Revision No. \_\_\_\_\_ Date \_\_\_\_\_  
 Technical Area: **Traffic and Transportation** Project: **Fountain Wind Project** Technical Staff: David Robinson, Adrita Islam  
 Project Manager: Lon Payne Docket: 23-OPT-01 Technical Senior: Steven Kerr

SITING REGULATIONS	INFORMATION	AFC PAGE NUMBER AND SECTION NUMBER	ADEQUATE YES OR NO	INFORMATION REQUIRED TO MAKE AFC CONFORM WITH REGULATIONS
Appendix B (g) (5) (C) (iii)	Current and projected levels of service before project development, during construction, and during project operation;	TN 248288-16: DEIR Transportation; Section 3.14.1.2 (Environmental Setting), Page 3.14-3 – 3.14-4, (Table 3.14-2)  <b>NOT DOCKETED:</b> Fountain Wind Project Draft EIR Appendix H (Transportation), Westwood Traffic Study, Fountain Wind Power, Shasta County, California, February 11, 2020, Page 12-16  <b>File was obtained from the following site on 1/30/2023:</b> <a href="https://www.shastacounty.gov/sites/default/files/fileattachments/planning/page/3361/appendix_h_transportation.pdf">https://www.shastacounty.gov/sites/default/files/fileattachments/planning/page/3361/appendix_h_transportation.pdf</a>	No	<b>Please update roadway capacity and intersection operations analysis.</b> As outlined above, the roadway capacity analysis was conducted using base capacity values that do not account for the impacts of heavy vehicles, grades or other sources of friction that will lower the capacity of a freeway or highway lane. In addition, the analysis needs to be updated based on new traffic count data.

Adequacy Issue: Adequate \_\_\_\_\_ Inadequate **X** **DATA ADEQUACY WORKSHEET** Revision No. \_\_\_\_\_ Date \_\_\_\_\_  
 Technical Area: **Traffic and Transportation** Project: **Fountain Wind Project** Technical Staff: David Robinson, Adrita Islam  
 Project Manager: Lon Payne Docket: 23-OPT-01 Technical Senior: Steven Kerr

SITING REGULATIONS	INFORMATION	AFC PAGE NUMBER AND SECTION NUMBER	ADEQUATE YES OR NO	INFORMATION REQUIRED TO MAKE AFC CONFORM WITH REGULATIONS
Appendix B (g) (5) (C) (iv)	Weight and load limitations;	TN 248288-16: DEIR Transportation; Section 3.14.1.2 (Environmental Setting), Page 3.14-2  TN 248320-3-16: Traffic Report, Page 1-2  <b>NOT DOCKETED:</b> Fountain Wind Project Draft EIR Appendix H (Transportation), Westwood Traffic Study, Fountain Wind Power, Shasta County, California, February 11, 2020, Page 1-2  <b>File was obtained from the following site on 1/30/2023:</b> <a href="https://www.shastacounty.gov/sites/default/files/fileattachments/planning/page/3361/appendix_h_transportation.pdf">https://www.shastacounty.gov/sites/default/files/fileattachments/planning/page/3361/appendix_h_transportation.pdf</a>	No	<b>Please expand the description of regional and local roadways affected and/or serving the proposed project.</b> Identify weight and load limitations on study roadways.

Adequacy Issue: Adequate \_\_\_\_\_ Inadequate **X** **DATA ADEQUACY WORKSHEET** Revision No. \_\_\_\_\_ Date \_\_\_\_\_  
 Technical Area: **Traffic and Transportation** Project: **Fountain Wind Project** Technical Staff: David Robinson, Adrita Islam  
 Project Manager: Lon Payne Docket: 23-OPT-01 Technical Senior: Steven Kerr

SITING REGULATIONS	INFORMATION	AFC PAGE NUMBER AND SECTION NUMBER	ADEQUATE YES OR NO	INFORMATION REQUIRED TO MAKE AFC CONFORM WITH REGULATIONS
Appendix B (g) (5) (C) (v)	Estimated percentage of current traffic flows for passenger vehicles and trucks; and	TN 248288-16: DEIR Transportation; Section 3.14.1.2 (Environmental Setting), Page 3.14-2 – 3.14-3  <b>NOT DOCKETED:</b> Fountain Wind Project Draft EIR Appendix H (Transportation), Westwood Traffic Study, Fountain Wind Power, Shasta County, California, February 11, 2020, Page 2-3.  <b>File was obtained from the following site on 1/30/2023:</b> <a href="https://www.shastacounty.gov/sites/default/files/fileattachments/planning/page/3361/appendix_h_transportation.pdf">https://www.shastacounty.gov/sites/default/files/fileattachments/planning/page/3361/appendix_h_transportation.pdf</a>	No	<b>Please collect new average daily vehicle traffic counts.</b> The heavy vehicle percentages from Caltrans Traffic Census Program on SR 299 are provided. The data is pre COVID-19 Pandemic and does not capture post pandemic changes in travel behavior. 24-hour vehicle classification traffic counts should be collected (in 15-minute increments) for a minimum three days (Tuesday, Wednesday, Thursday), during a representative time of year when construction is anticipated.

Adequacy Issue: Adequate \_\_\_\_\_ Inadequate **X** **DATA ADEQUACY WORKSHEET** Revision No. \_\_\_\_\_ Date \_\_\_\_\_  
 Technical Area: **Traffic and Transportation** Project: **Fountain Wind Project** Technical Staff: David Robinson, Adrita Islam  
 Project Manager: Lon Payne Docket: 23-OPT-01 Technical Senior: Steven Kerr

<b>SITING REGULATIONS</b>	<b>INFORMATION</b>	<b>AFC PAGE NUMBER AND SECTION NUMBER</b>	<b>ADEQUATE YES OR NO</b>	<b>INFORMATION REQUIRED TO MAKE AFC CONFORM WITH REGULATIONS</b>
Appendix B (g) (5) (C) (vi)	An identification of any road features affecting public safety.	TN 248288-16: DEIR Transportation; Section 3.14.1.2 (Environmental Setting), Page 3.14-2 – 3.14-4, Section 3.14.3.2 (Page 3.14-13 – 3.14-15 TN 248320-3-16: Traffic Report, Page 1-2 <b>NOT DOCKETED:</b> Fountain Wind Project Draft EIR Appendix H (Transportation), Westwood Traffic Study, Fountain Wind Power, Shasta County, California, February 11, 2020, Page 2-3 <b>File was obtained from the following site on 1/30/2023:</b> <a href="https://www.shastacounty.gov/sites/default/files/fileattachments/planning/page/3361/appendix_h_transportation.pdf">https://www.shastacounty.gov/sites/default/files/fileattachments/planning/page/3361/appendix_h_transportation.pdf</a>	No	<b>Please collect collision records on study roadways.</b> Collect and map the most recent 3-year collision data available for the study corridors to identify locations where road features or characteristics may be affecting public safety. Expand impact discussion Impact 3.14-3 to incorporate relevant findings of collision analysis.

Adequacy Issue: Adequate \_\_\_\_\_ Inadequate **X** **DATA ADEQUACY WORKSHEET** Revision No. \_\_\_\_\_ Date \_\_\_\_\_  
 Technical Area: **Traffic and Transportation** Project: **Fountain Wind Project** Technical Staff: David Robinson, Adrita Islam  
 Project Manager: Lon Payne Docket: 23-OPT-01 Technical Senior: Steven Kerr

<b>SITING REGULATIONS</b>	<b>INFORMATION</b>	<b>AFC PAGE NUMBER AND SECTION NUMBER</b>	<b>ADEQUATE YES OR NO</b>	<b>INFORMATION REQUIRED TO MAKE AFC CONFORM WITH REGULATIONS</b>
Appendix B (g) (5) (D)	An assessment of the construction and operation impacts of the proposed project on the transportation facilities identified in (g)(5)(C). Also include anticipated projectspecific traffic, estimated changes to daily average and peak traffic counts, levels of service, and traffic/truck mix, and the impact of construction of any facilities identified in (g)(5)(C).	TN 248288-16: DEIR Transportation  <b>NOT DOCKETED:</b> Fountain Wind Project Draft EIR Appendix H (Transportation), Westwood Traffic Study, Fountain Wind Power, Shasta County, California, February 11  <b>File was obtained from the following site on 1/30/2023:</b> <a href="https://www.shastacounty.gov/sites/default/files/fileattachments/planning/page/3361/appendix_h_transportation.pdf">https://www.shastacounty.gov/sites/default/files/fileattachments/planning/page/3361/appendix_h_transportation.pdf</a>	No	<b>Please see above.</b>

Adequacy Issue: Adequate \_\_\_\_\_ Inadequate **X** **DATA ADEQUACY WORKSHEET**  
 Technical Area: **Traffic and Transportation** Project: **Fountain Wind Project**  
 Project Manager: Lon Payne Docket: 23-OPT-01

Revision No. \_\_\_\_\_ Date \_\_\_\_\_  
 Technical Staff: David Robinson, Adrita Islam  
 Technical Senior: Steven Kerr

<b>SITING REGULATIONS</b>	<b>INFORMATION</b>	<b>AFC PAGE NUMBER AND SECTION NUMBER</b>	<b>ADEQUATE YES OR NO</b>	<b>INFORMATION REQUIRED TO MAKE AFC CONFORM WITH REGULATIONS</b>
Appendix B (g) (5) (E)	A discussion of project-related hazardous materials to be transported to or from the project during construction and operation of the project, including the types, estimated quantities, estimated number of trips, anticipated routes, means of transportation, and any transportation hazards associated with such transport.	TN 248288-13: DEIR Hazards and Hazardous Materials; Section 3.11.3.2, Page 3.11-9 – 3.11-10 TN 248288-16: DEIR Transportation; Section 3.14.3.2, Page 3.14-13 TN 248288-2: DEIR Description of Project and Alternatives; Section 2.4.8.3, Table 2-3 (Hazardous Materials), Pages 2-26	Yes	
Appendix B (i) (1) (A)	Tables that identify laws, regulations, ordinances, standards, adopted local, regional, state, and federal land use plans, leases, and permits applicable to the proposed project, and a discussion of the applicability of, and conformance with each. The table or matrix shall explicitly reference pages in the application wherein conformance, with each law or standard during both construction and operation of the facility is discussed; and	TN 248290: Labor Regs Consistency Matrix	No	<b>The Law, Ordinance, Regulation, or Standard Consistency Matrix (TN 248290) does not identify the specific Shasta County Code ordinances or standards that are applicable during construction and operation of the proposed facility.</b>



Adequacy Issue: Adequate \_\_\_\_\_ Inadequate **X** **DATA ADEQUACY WORKSHEET**  
 Technical Area: **Traffic and Transportation** Project: **Fountain Wind Project**  
 Project Manager: Lon Payne Docket: 23-OPT-01

Revision No. \_\_\_\_\_ Date \_\_\_\_\_  
 Technical Staff: David Robinson, Adrita Islam  
 Technical Senior: Steven Kerr

<b>SITING REGULATIONS</b>	<b>INFORMATION</b>	<b>AFC PAGE NUMBER AND SECTION NUMBER</b>	<b>ADEQUATE YES OR NO</b>	<b>INFORMATION REQUIRED TO MAKE AFC CONFORM WITH REGULATIONS</b>
Appendix B (i) (1) (B)	Tables that identify each agency with jurisdiction to issue applicable permits, leases, and approvals or to enforce identified laws, regulations, standards, and adopted local, regional, state and federal land use plans, and agencies that would have permit approval or enforcement authority, but for the exclusive authority of the Commission to certify sites and related facilities.	TN 248322: Executive Summary and Project Description; pages 16-17 (Table 3)	Yes	
Appendix B (i) (2)	The name, title, phone number, address (required), and email address (if known), of an official who was contacted within each agency, and provide the name of the official who will serve as a contact person for Commission staff.	<b>NOT DOCKETED:</b> Fountain Wind Project Draft EIR Chapter 5 (Report Preparation), Section 5.4 (Entities Consulted and Recipients of the Draft EIR and/or the Notice of Availability), pages 5-3 to 5-5  <b>File was obtained from the following site:</b> <a href="https://www.shastacounty.gov/planning/page/draft-eir-fountain-wind-project">https://www.shastacounty.gov/planning/page/draft-eir-fountain-wind-project</a>	No	<b>Please provide agency contact information. The DEIR list of federal, state, and local agencies consulted does not include the contact's phone number, address, email address, or the subject matter relevant to the contact. The list does not indicate who should serve as the contact person for Commission staff.</b>

Adequacy Issue: Adequate \_\_\_\_\_ Inadequate **X** **DATA ADEQUACY WORKSHEET** Revision No. \_\_\_\_\_ Date \_\_\_\_\_  
 Technical Area: **Traffic and Transportation** Project: **Fountain Wind Project** Technical Staff: David Robinson, Adrita Islam  
 Project Manager: Lon Payne Docket: 23-OPT-01 Technical Senior: Steven Kerr

<b>SITING REGULATIONS</b>	<b>INFORMATION</b>	<b>AFC PAGE NUMBER AND SECTION NUMBER</b>	<b>ADEQUATE YES OR NO</b>	<b>INFORMATION REQUIRED TO MAKE AFC CONFORM WITH REGULATIONS</b>
Appendix B (i) (3)	A schedule indicating when permits outside the authority of the Commission will be obtained and the steps the applicant has taken or plans to take to obtain such permits.	TN 248322: Executive Summary and Project Description; Section 5 (Project Permits), Table 3 (List of Potential Permits and Status), pages 16 to 17	No	<b>Please provide schedule for obtaining permits.</b> The "List of Potential Permits and Status" provided in Table 3 does not identify the steps involved or the schedule for obtaining the permits that are outside the authority of the commission.

Adequacy Issue: Adequate \_\_\_\_\_ Inadequate **x**  
 Technical Area: **Transmission System Design**  
 Project Manager: Leonidas Payne

**DATA ADEQUACY WORKSHEET**  
 Project: **Fountain Wind Project**  
 Docket: 23-OPT-01

Revision No. \_\_\_\_\_ Date 2/2/2023  
 Technical Staff: Laiping Ng  
 Technical Senior: Mark Hesters

SITING REGULATIONS	INFORMATION	AFC PAGE NUMBER AND SECTION NUMBER	ADEQUATE YES OR NO	INFORMATION REQUIRED TO MAKE AFC CONFORM WITH REGULATIONS
Appendix B (h) (2) (A)	A discussion of the need for the additional electric transmission lines, substations, or other equipment, the basis for selecting principal points of junction with the existing electric transmission system, and the capacity and voltage levels of the proposed lines, along with the basis for selection of the capacity and voltage levels.	DEIR Description of Project and Alternatives Section 2 Section 2.3 Section 2.4.2	Yes	
Appendix B (h) (2) (B)	A discussion of the extent to which the proposed electric transmission facilities have been designed, planned, and routed to meet the transmission requirements created by additional generating facilities planned by the applicant or any other entity.	DEIR Description of Project and Alternatives Section 2	Yes	

Adequacy Issue: Adequate \_\_\_\_\_ Inadequate  x   
 Technical Area:  Transmission System Design   
 Project Manager:  Leonidas Payne

**DATA ADEQUACY WORKSHEET**  
 Project:  Fountain Wind Project   
 Docket:  23-OPT-01

Revision No. \_\_\_\_\_ Date  2/2/2023   
 Technical Staff:  Laiping Ng   
 Technical Senior:  Mark Hesters

SITING REGULATIONS	INFORMATION	AFC PAGE NUMBER AND SECTION NUMBER	ADEQUATE YES OR NO	INFORMATION REQUIRED TO MAKE AFC CONFORM WITH REGULATIONS
Appendix B (b) (2) (C)	A detailed description of the design, construction, and operation of any electric transmission facilities, such as power lines, substations, switchyards, or other transmission equipment, which will be constructed or modified to transmit electrical power from the proposed power plant to the load centers to be served by the facility. Such description shall include the width of rights of way and the physical and electrical characteristics of electrical transmission facilities such as towers, conductors, and insulators.	DEIR Description of Project and Alternatives Section 2 Section 2.4.3 Figure 2-4b  CEQA Initial Study Figure 5 Figure 6	No	Provide one-line diagrams for the new switching station. Show all equipment ratings including bay arrangement of the breakers, disconnect switches, buses. Show the interconnection to the PG&E transmission system and the project substation.  Provide one-line diagrams for the project substation. Show all equipment ratings including transformers, circuit breakers, disconnect switches, which are required for the project interconnection to the switching station. Show the interconnection to the switching station and the overhead and underground collector lines. Show all lines voltages.  Provide the 230 kV transmission poles configuration which required to support the overhead conductor to connect the project to the switching station and the existing PG&E 230 kV transmission lines.  Provide all of the overhead conductor types, their current carrying capacities and sizes.  Provide the underground cable types, their current carrying capacities and size.

Adequacy Issue: Adequate \_\_\_\_\_ Inadequate  x   
 Technical Area:  Transmission System Design   
 Project Manager:  Leonidas Payne

**DATA ADEQUACY WORKSHEET**  
 Project:  Fountain Wind Project   
 Docket:  23-OPT-01

Revision No. \_\_\_\_\_ Date  2/2/2023   
 Technical Staff:  Laiping Ng   
 Technical Senior:  Mark Hesters

SITING REGULATIONS	INFORMATION	AFC PAGE NUMBER AND SECTION NUMBER	ADEQUATE YES OR NO	INFORMATION REQUIRED TO MAKE AFC CONFORM WITH REGULATIONS
Appendix B (b) (2) (D)	A description of how the route and additional transmission facilities were selected, and the consideration given to engineering constraints, environmental impacts, resource conveyance constraints, and electric transmission constraints.	CEQA Initial Study Section 2.4.2.2 Figure 2-2	Yes	
Appendix B (b) (2) (E)	<p>A completed System Impact Study or signed System Impact Study Agreement with the California Independent System Operator and proof of payment. When not connecting to the California Independent System Operator controlled grid, provide the executed System Impact Study agreement and proof of payment to the interconnecting utility.</p> <p>If the interconnection and operation of the proposed project will likely impact an transmission system that is not controlled by the interconnecting utility (or California Independent System Operator), provide evidence of a System Impact Study or agreement and proof of payment (when applicable) with/to the impacted transmission owner or provide evidence that there are no system impacts requiring mitigation.</p>	Interconnection Memo	No	<p>Provide the California ISO Cluster Studies.</p> <p>Provide the most recent California ISO reassessment documentation.</p> <p>Provide the executed Large Generator Interconnection Agreement and any subsequent California ISO documentation related to and required for the interconnection of the project. If these documents indicate the project would cause transmission line overloads which might require transmission line reconductoring or other significant downstream transmission upgrades, a general CEQA analysis of these facilities will be required.</p>

Adequacy Issue: Adequate \_\_\_\_\_ Inadequate **x**  
 Technical Area: **Transmission System Design**  
 Project Manager: **Leonidas Payne**

**DATA ADEQUACY WORKSHEET**  
 Project: **Fountain Wind Project**  
 Docket: **23-OPT-01**

Revision No. \_\_\_\_\_ Date 2/2/2023  
 Technical Staff: Laiping Ng  
 Technical Senior: Mark Hesters

SITING REGULATIONS	INFORMATION	AFC PAGE NUMBER AND SECTION NUMBER	ADEQUATE YES OR NO	INFORMATION REQUIRED TO MAKE AFC CONFORM WITH REGULATIONS
Appendix B (i) (1) (A)	Tables that identify laws, regulations, ordinances, standards, adopted local, regional, state, and federal land use plans, leases, and permits applicable to the proposed project, and a discussion of the applicability of, and conformance with each. The table or matrix shall explicitly reference pages in the application wherein conformance, with each law or standard during both construction and operation of the facility is discussed; and		No	Provide CPUC G.O. 95 and G.O 128 rules for overhead and underground electric line construction and provide a brief discussion.
Appendix B (i) (1) (B)	Tables that identify each agency with jurisdiction to issue applicable permits, leases, and approvals or to enforce identified laws, regulations, standards, and adopted local, regional, state and federal land use plans, and agencies that would have permit approval or enforcement authority, but for the exclusive authority of the Commission to certify sites and related facilities.	CEQA Initial Study Section 5 Table 3	Yes	
Appendix B (i) (2)	The name, title, phone number, address (required), and email address (if known), of an official who was contacted within each agency, and provide the name of the official who will serve as a contact person for Commission staff.		No	Provide names, phone numbers, address and email address of the official contact person of each agency.
Appendix B (i) (3)	A schedule indicating when permits outside the authority of the Commission will be obtained and the steps the applicant has taken or plans to take to obtain such permits.	Interconnection Memo	Yes	

Adequacy Issue: Adequate      Inadequate   **X**    
 Technical Area: **Visual Resources**  
 Project Manager: Lon Payne

**DATA ADEQUACY WORKSHEET**  
 Project: **Fountain Wind Project**  
 Docket: 01-OPT-23

Revision No.      Date       
 Technical Staff: Michael Clayton  
 Technical Senior: Steve Kerr

SITING REGULATIONS	INFORMATION	AFC PAGE NUMBER AND SECTION NUMBER	ADEQUATE YES OR NO	INFORMATION REQUIRED TO MAKE AFC CONFORM WITH REGULATIONS
Appendix B (g) (1)	...provide a discussion of the existing site conditions, the expected direct, indirect and cumulative impacts due to the construction, operation and maintenance of the project, the measures proposed to mitigate adverse environmental impacts of the project, the effectiveness of the proposed measures, and any monitoring plans proposed to verify the effectiveness of the mitigation.	TN 248288-4: DEIR Aesthetics Sections 3.2.2.1 Study Area, 3.2.2.2 Environmental Setting, 3.2.4.2 Direct and Indirect Effects of the Project, and 3.2.5 Cumulative Impacts  TN 248320-10: Shadow Flicker Rev. 2  TN 248320-13: Visual Resources Technical Report Rev. 2, Sections 2.2 Setting, 4.0 Affected Environment, 5.0 Results and Discussion, and 5.4 Potential Mitigation  TN 248330-2: Project Refinement Memo, Section 2.6 Visual Resources and 3.0 Conclusions	No	<ul style="list-style-type: none"> <li>• The current impact analysis addresses the previous project and must be revised to address the currently proposed project.</li> <li>• The selected seven KOPs are inadequate to support the present analysis and must be revised/augmented. Specifically:             <ul style="list-style-type: none"> <li>○ Of the original seven KOPs, only two (KOPs 1 and 2) are close enough to the project such that turbines could be perceived. A better balance of distant and proximal viewing locations needs to be represented in the selection of KOPs in order to accurately characterize Aesthetics impacts on public views. For example, a portion of the B turbine string is within one mile of SR 299. That segment of SR 299 and may be an appropriate location for a representative KOP if project visibility can be demonstrated.</li> <li>○ Under the currently proposed project design, KOP 1 is no longer orientated toward the project and must either be re-oriented or replaced such that the project is visible in the frame of view.</li> </ul> </li> <li>• The visual simulations provided to support the impact analysis are inadequate in terms of quality, content, and format and must be revised and/or replaced to correct the following inadequacies:</li> </ul>

Adequacy Issue: Adequate \_\_\_\_\_ Inadequate  X   
 Technical Area: **Visual Resources**  
 Project Manager: Lon Payne

**DATA ADEQUACY WORKSHEET**  
 Project: **Fountain Wind Project**  
 Docket: 01-OPT-23

Revision No. \_\_\_\_\_ Date \_\_\_\_\_  
 Technical Staff: Michael Clayton  
 Technical Senior: Steve Kerr

SITING REGULATIONS	INFORMATION	AFC PAGE NUMBER AND SECTION NUMBER	ADEQUATE YES OR NO	INFORMATION REQUIRED TO MAKE AFC CONFORM WITH REGULATIONS
				<ul style="list-style-type: none"> <li>○ The resolution of the provided images is so low that the turbines described in the text and captions as being visible are minimally discernible.</li> <li>○ In some simulations, the color of the turbines does not appear as bright (white) as one would expect for turbines not being backlit by the sun. This artificially reduces structure visibility.</li> <li>○ Full-page, color photographs of the existing views and visual simulations of the proposed project at life-size scale (when the picture is held 10 inches from the viewer’s eyes) have not been provided as required in the Siting Regulations Appendix B (g) (6) (F) and must be submitted.</li> <li>● The DEIR acknowledges that vegetation-cleared corridors may be detectable in long-distance views and states that minimal visual contrast would result. However, there is no analysis or simulations to support this conclusion. Therefore, an evaluation of the considerable vegetation clearance that is proposed for the Overhead Collector Corridors and for Road Widening shall be provided. If any in-line views of a cleared linear corridor are visible from a public vantage point, a representative KOP shall be established, and a simulation shall be prepared.</li> </ul>



Adequacy Issue: Adequate \_\_\_\_\_ Inadequate  X   
 Technical Area:  Visual Resources   
 Project Manager:  Lon Payne

**DATA ADEQUACY WORKSHEET**  
 Project:  Fountain Wind Project   
 Docket:  01-OPT-23

Revision No. \_\_\_\_\_ Date \_\_\_\_\_  
 Technical Staff:  Michael Clayton   
 Technical Senior:  Steve Kerr

SITING REGULATIONS	INFORMATION	AFC PAGE NUMBER AND SECTION NUMBER	ADEQUATE YES OR NO	INFORMATION REQUIRED TO MAKE AFC CONFORM WITH REGULATIONS
				<ul style="list-style-type: none"> <li>Proposed night lighting at the project site is insufficiently described to support the stated conclusion that lighting impacts would be less than significant. All proposed lighting with the potential to be viewed by the public beyond the project boundary must be described and mapped. Further, lighting mitigation measures need to be identified where night lighting has the potential to be viewed by the public. In those cases, a night lighting mitigation plan shall be provided.</li> </ul>
Appendix B (g) (6) (A)	Descriptions of the existing visual setting of the vicinity of the proposed project site and the proposed routes for any project-related linear facilities. Include:	TN 248288-4: DEIR Aesthetics Sections 3.2.2.1 Study Area and 3.2.2.2 Environmental Setting  TN 248320-13: Visual Resources Technical Report Rev. 2, Sections 2.2 Setting and 4.0 Affected Environment  TN 248330-2: Project Refinement Memo, Sections 1.1 Refinements, 2.6 Visual Resources, and 3.0 Conclusions	No	<ul style="list-style-type: none"> <li>Descriptions and maps of the proposed overhead electrical collector routes to be cleared of vegetation and existing roadways to be widened shall be provided.</li> <li>If any in-line views of a cleared linear corridor are visible from a public vantage point, a representative KOP shall be established, and a simulation shall be prepared.</li> </ul>

Adequacy Issue: Adequate \_\_\_\_\_ Inadequate **X**  
 Technical Area: **Visual Resources**  
 Project Manager: Lon Payne

**DATA ADEQUACY WORKSHEET**  
 Project: **Fountain Wind Project**  
 Docket: 01-OPT-23

Revision No. \_\_\_\_\_ Date \_\_\_\_\_  
 Technical Staff: Michael Clayton  
 Technical Senior: Steve Kerr

SITING REGULATIONS	INFORMATION	AFC PAGE NUMBER AND SECTION NUMBER	ADEQUATE YES OR NO	INFORMATION REQUIRED TO MAKE AFC CONFORM WITH REGULATIONS
Appendix B (g) (6) (A) (i)	Topographic maps at a scale of 1:24,000 that depict directions from which the project would be seen, the view areas most sensitive to the potential visual impacts of the project, and the locations where photographs were taken for (g)(6)(C); and	TN 248330-2: Project Refinement Memo, Figures 5a, 5b, and 5d through 5g	No	<ul style="list-style-type: none"> <li>• Maps provided are at scales ranging from 1:60,000 to 1:506,880. These maps shall be revised to reflect the location and view direction of existing, revised, or replaced KOPs.</li> <li>• The scale of the maps can be deemed acceptable with the submission of a kmz file depicting the locations of the 48 proposed turbines, the linear areas to be cleared of vegetation (electrical collector corridors and roads to be widened), all other project ancillary structures/facilities, and the final KOPs.</li> </ul>
Appendix B (g) (6) (A) (ii)	Description of the existing visual properties of the topography, vegetation, and any modifications to the landscape as a result of human activities, including existing water vapor plumes, above-ground electrical transmission lines, and nighttime lighting levels in the project viewshed.	TN 248288-4: DEIR Aesthetics Sections 3.2.2.1 Study Area and 3.2.2.2 Environmental Setting  TN 248320-13: Visual Resources Technical Report Rev. 2, Sections 2.2 Setting, 4.0 Affected Environment, and 5.0 Results and Discussion  TN 248330-2: Project Refinement Memo, Sections 2.6 Visual Resources and 3.0 Conclusions	No	<ul style="list-style-type: none"> <li>• A description of the extent of night lighting (including FAA lighting) associated with the Hatchet Ridge Wind Project shall be provided.</li> <li>• A description of the existing transmission lines that are in the project vicinity and/or within the same frame of view from each of the KOPs shall be provided.</li> </ul>
Appendix B (g) (6) (B)	An assessment of the visual quality of those areas that would be affected by the proposed project. For projects proposed to be located within the coastal zone, the assessment should also describe	TN 248288-4: DEIR Aesthetics Sections 3.2.2.1	Yes	

Adequacy Issue: Adequate \_\_\_\_\_ Inadequate **X**  
 Technical Area: **Visual Resources**  
 Project Manager: Lon Payne

**DATA ADEQUACY WORKSHEET**  
 Project: **Fountain Wind Project**  
 Docket: 01-OPT-23

Revision No. \_\_\_\_\_ Date \_\_\_\_\_  
 Technical Staff: Michael Clayton  
 Technical Senior: Steve Kerr

SITING REGULATIONS	INFORMATION	AFC PAGE NUMBER AND SECTION NUMBER	ADEQUATE YES OR NO	INFORMATION REQUIRED TO MAKE AFC CONFORM WITH REGULATIONS
	<p>how the proposed project would be sited to protect views to and along the ocean and scenic coastal areas, would minimize the alteration of natural landforms, would be visually compatible with the character of surrounding areas.</p>	<p>Study Area and 3.2.2.2 Environmental Setting            TN 248320-13: Visual Resources Technical Report Rev. 2, Sections 2.2 Setting, 4.0 Affected Environment, and 5.0 Results and Discussion            TN 248330-2: Project Refinement Memo, Sections 2.6 Visual Resources and 3.0 Conclusions</p>		
<p>Appendix B (g) (6) (C)</p>	<p>In consultation with Commission staff, identify: i) designated scenic roadways or scenic corridors and any visually sensitive areas that would be affected by the proposed project, including recreational and residential areas; and ii) the locations of the key observation points to represent the most critical viewing locations from which to conduct detailed analyses of the visual impacts of the proposed project. Indicate the approximate number of people using each of these sensitive areas and the estimated number of residences with views of the project. Also identify any major public roadways and trails of local importance that would be visually impacted by the project and indicate the types of travelers (that is, residents, recreationists, workers, commuters, etc.) and the approximate number of vehicles, bicyclists, and/or hikers per day.</p>	<p>TN 248288-4: DEIR Aesthetics Sections 3.2.2.1 Study Area and 3.2.2.2 Environmental Setting            TN 248320-13: Visual Resources Technical Report Rev. 2, Sections 2.2 Setting, 4.0 Affected Environment, and 5.0 Results and Discussion            TN 248330-2: Project Refinement Memo, Sections 2.6 Visual Resources and 3.0 Conclusions</p>	<p>No</p>	<ul style="list-style-type: none"> <li>• The selected seven KOPs are inadequate to support the present analysis and must be revised/augmented. Specifically:               <ul style="list-style-type: none"> <li>○ Of the original seven KOPs, only two (KOPs 1 and 2) are close enough to the project such that turbines could be perceived. A better balance of distant and proximal viewing locations needs to be represented in the selection of KOPs in order to accurately characterize Aesthetics impacts on public views. For example, a portion of the B turbine string is within one mile of SR 299. That segment of SR 299 may be an appropriate location for a representative KOP if project visibility can be demonstrated.</li> </ul> </li> </ul>

Adequacy Issue: Adequate \_\_\_\_\_ Inadequate  X   
 Technical Area:  Visual Resources   
 Project Manager:  Lon Payne

**DATA ADEQUACY WORKSHEET**  
 Project:  Fountain Wind Project   
 Docket:  01-OPT-23

Revision No. \_\_\_\_\_ Date \_\_\_\_\_  
 Technical Staff:  Michael Clayton   
 Technical Senior:  Steve Kerr

SITING REGULATIONS	INFORMATION	AFC PAGE NUMBER AND SECTION NUMBER	ADEQUATE YES OR NO	INFORMATION REQUIRED TO MAKE AFC CONFORM WITH REGULATIONS
				<ul style="list-style-type: none"> <li>○ Under the currently proposed project design, KOP 1 is no longer oriented toward the project and must either be re-oriented or replaced such that the project is visible in the frame of view.</li> <li>● The approximate number of people using each of these sensitive areas and the estimated number of residences with views of the project shall be indicated in the analysis. The types of travelers (that is, residents, recreationists, workers, commuters, etc.) and the approximate number of vehicles, bicyclists, and/or hikers per day shall be included.</li> </ul>
Appendix B (g) (6) (D)	A table providing the dimensions (height, length, and width, or diameter) and, proposed color(s), materials, finishes, patterns, and other proposed design characteristics of each major component visible from off the project site, including any project-related electrical transmission line and/or offsite aboveground pipelines and metering stations.	TN 248288-2: DEIR Section 2.4.1, Figure 2-4a: Typical Wind Turbine and Figure 6: Typical Overhead Collector Line Pole  TN 248288-4: DEIR Aesthetics Sections 3.2.2 Setting and 3.2.4 Direct and Indirect Effects  TN 248297-2: CEQA Initial Study, Figure 6: Typical Overhead Collector Line Pole	No	<ul style="list-style-type: none"> <li>● A table that describes the dimensions (height, length, and width, or diameter) and proposed color(s), materials, finishes, patterns, and other proposed design characteristics of each major component visible from public viewpoints beyond the project site shall be provided. The table shall include wind turbines, electrical collector lines, operations and maintenance buildings, meteorological towers, and any other built project components that would be visible to the public.</li> </ul>

Adequacy Issue: Adequate \_\_\_\_\_ Inadequate **X**  
 Technical Area: **Visual Resources**  
 Project Manager: Lon Payne

**DATA ADEQUACY WORKSHEET**  
 Project: **Fountain Wind Project**  
 Docket: 01-OPT-23

Revision No. \_\_\_\_\_ Date \_\_\_\_\_  
 Technical Staff: Michael Clayton  
 Technical Senior: Steve Kerr

SITING REGULATIONS	INFORMATION	AFC PAGE NUMBER AND SECTION NUMBER	ADEQUATE YES OR NO	INFORMATION REQUIRED TO MAKE AFC CONFORM WITH REGULATIONS
		TN 248320-13: Visual Resources Technical Report Rev. 2  TN 248322: Executive Summary and Project Description, Sections 3.1 Wind Turbine Generators; 4.1.2 Overhead Collector System; 4.2 Substation, Switching Station, and Interconnection Facilities; 4.3.1 Access Roads; 4.3.3 O&M Facility; and 4.3.4 Meteorological Equipment  TN 248330-2: Project Refinement Memo, Section 2.6 Visual Resources and Section 3.0 Conclusions		
Appendix B (g) (6) (E)	Provide the cooling tower and heat recovery steam generator (HRSG) exhaust design parameters that affect visible plume formation. For the cooling tower, data shall include heat rejection rate, exhaust temperature, exhaust mass flow rate, liquid to gas mass flow ratio, and, if the tower is plume-abated, moisture content (percent by weight) or plume-abated fogging curve(s). The parameters shall account for a range of ambient conditions (temperature and relative humidity) and proposed operating scenarios, such as duct	Not Applicable	Not Applicable	Not Applicable

Adequacy Issue: Adequate \_\_\_\_\_ Inadequate  X   
 Technical Area:  Visual Resources   
 Project Manager:  Lon Payne

**DATA ADEQUACY WORKSHEET**  
 Project:  Fountain Wind Project   
 Docket:  01-OPT-23

Revision No. \_\_\_\_\_ Date \_\_\_\_\_  
 Technical Staff:  Michael Clayton   
 Technical Senior:  Steve Kerr

SITING REGULATIONS	INFORMATION	AFC PAGE NUMBER AND SECTION NUMBER	ADEQUATE YES OR NO	INFORMATION REQUIRED TO MAKE AFC CONFORM WITH REGULATIONS
	<p>firing and shutting down individual cells. For the heat recovery steam generator exhausts, data shall include moisture content (percent by weight), exhaust mass flow rate, and exhaust temperature. The parameters must correspond to full-load operating conditions at specified ambient conditions, and shall account for proposed operating scenarios, such as power augmentation (that is, evaporative coolers, inlet foggers, or steam injection) and duct firing, or proposed HRSG visible plume abatement, such as the use of an economizer bypass. For simple-cycle projects, provide analogous data for the exhaust stack(s).</p>			

Adequacy Issue: Adequate \_\_\_\_\_ Inadequate **X**  
 Technical Area: **Visual Resources**  
 Project Manager: Lon Payne

**DATA ADEQUACY WORKSHEET**  
 Project: **Fountain Wind Project**  
 Docket: 01-OPT-23

Revision No. \_\_\_\_\_ Date \_\_\_\_\_  
 Technical Staff: Michael Clayton  
 Technical Senior: Steve Kerr

SITING REGULATIONS	INFORMATION	AFC PAGE NUMBER AND SECTION NUMBER	ADEQUATE YES OR NO	INFORMATION REQUIRED TO MAKE AFC CONFORM WITH REGULATIONS
Appendix B (g) (6) (F)	Provide: i) full-page color photographic reproductions of the existing site, and ii) full-page color simulations of the proposed project at life-size scale when the picture is held 10 inches from the viewer's eyes, including any project-related electrical transmission lines, in the existing setting from each key observation point. If any landscaping is proposed to comply with zoning requirements or to mitigate visual impacts, include the landscaping in simulation(s) representing sensitive area views, depicting the landscaping five years after installation; and estimate the expected time until maturity is reached.	TN 248320-13: Visual Resources Technical Report Rev. 2 TN 248330-2: Project Refinement Memo, Figures 5a, 5b, and 5d through 5g	No	<ul style="list-style-type: none"> <li>• The visual simulations provided to support the impact analysis are inadequate in terms of quality, content, and format and must be revised and/or replaced to correct the following inadequacies:               <ul style="list-style-type: none"> <li>○ The resolution of the provided images is so low that the turbines described in the text and captions as being visible are minimally discernible.</li> <li>○ In some simulations, the color of the turbines does not appear as bright (white) as one would expect for turbines not being backlit by the sun. This artificially reduces structure visibility.</li> <li>○ Full-page, color photographs of the existing views and visual simulations of the proposed project at life-size scale (when the picture is held 10 inches from the viewer's eyes) have not been provided as required in the Siting Regulations Appendix B (g) (6) (F), and must be submitted.</li> </ul> </li> </ul>
Appendix B (g) (6) (G)	An assessment of the visual impacts of the project, including light, glare, and any modeling of visible plumes. Include a description of the method and identify any computer model used to assess the impacts. Provide an estimate of the expected frequency and dimensions (height, length, and width) of the visible cooling tower	TN 248288-4: DEIR Aesthetics Section 3.2.4 Direct and Indirect Effects TN 248320-13: Visual Resources Technical Report Rev. 2	No	<ul style="list-style-type: none"> <li>• The current impact analysis addresses the previous project and must be revised to address the currently proposed project.</li> <li>• The selected seven KOPs are inadequate to support the present analysis and must be</li> </ul>

Adequacy Issue: Adequate \_\_\_\_\_ Inadequate **X**  
 Technical Area: **Visual Resources**  
 Project Manager: Lon Payne

**DATA ADEQUACY WORKSHEET**  
 Project: **Fountain Wind Project**  
 Docket: 01-OPT-23

Revision No. \_\_\_\_\_ Date \_\_\_\_\_  
 Technical Staff: Michael Clayton  
 Technical Senior: Steve Kerr

SITING REGULATIONS	INFORMATION	AFC PAGE NUMBER AND SECTION NUMBER	ADEQUATE YES OR NO	INFORMATION REQUIRED TO MAKE AFC CONFORM WITH REGULATIONS
	and/or exhaust stack plumes. Provide the supporting assumptions, meteorological data, operating parameters, and calculations used.	TN 248330-2: Project Refinement Memo, Sections 2.6 Visual Resources and 3.0 Conclusions		revised/augmented as discussed above under Siting Regulation Appendix B (g) (1). <ul style="list-style-type: none"> <li>• An evaluation of the considerable vegetation clearance that is proposed for the Overhead Collector Corridors and for Road Widening shall be provided. If any in-line views of a linear corridor are visible from a public vantage point, a representative KOP shall be established, and a simulation shall be prepared.</li> <li>• Proposed night lighting at the project site is insufficiently described to support the stated conclusion that lighting impacts would be less than significant. All proposed lighting with the potential to be viewed by the public beyond the project boundary must be described and mapped. Further, lighting mitigation measures need to be identified where night lighting has the potential to be viewed by the public. In those cases, a night lighting mitigation plan shall be provided.</li> </ul>
Appendix B (g) (6) (H)	If any landscaping is proposed to reduce the visual impacts of the project, provide a conceptual landscaping plan at a 1:40 scale (1"=40'). Include information on the type of plant species proposed, their size, quantity, and spacing at planting, expected heights at 5 years and maturity, and expected growth rates.	Not Applicable	Not Applicable	Not Applicable



Adequacy Issue: Adequate \_\_\_\_\_ Inadequate **X**  
 Technical Area: **Visual Resources**  
 Project Manager: Lon Payne

**DATA ADEQUACY WORKSHEET**  
 Project: **Fountain Wind Project**  
 Docket: 01-OPT-23

Revision No. \_\_\_\_\_ Date \_\_\_\_\_  
 Technical Staff: Michael Clayton  
 Technical Senior: Steve Kerr

SITING REGULATIONS	INFORMATION	AFC PAGE NUMBER AND SECTION NUMBER	ADEQUATE YES OR NO	INFORMATION REQUIRED TO MAKE AFC CONFORM WITH REGULATIONS
Appendix B (i) (1) (A)	Tables that identify laws, regulations, ordinances, standards, adopted local, regional, state, and federal land use plans, leases, and permits applicable to the proposed project, and a discussion of the applicability of, and conformance with each. The table or matrix shall explicitly reference pages in the application wherein conformance, with each law or standard during both construction and operation of the facility is discussed; and	TN 248288-4: DEIR Aesthetics Section 3.2.2.3 Regulatory Setting  TN 248320-13: Visual Resources Technical Report Rev. 2, Section 4.1 Regulatory Setting	No	<ul style="list-style-type: none"> <li>A table or matrix shall be provided that specifically references pages in the application wherein conformance with each applicable law or standard during both construction and operation of the facility is discussed.</li> </ul>
Appendix B (i) (1) (B)	Tables that identify each agency with jurisdiction to issue applicable permits, leases, and approvals or to enforce identified laws, regulations, standards, and adopted local, regional, state and federal land use plans, and agencies which would have permit approval or enforcement authority, but for the exclusive authority of the commission to certify sites and related facilities.	TN 248288-4: DEIR Aesthetics Section 3.2.2.3 Regulatory Setting  TN 248320-13: Visual Resources Report Rev. 2, Section 4.1 Regulatory Setting	No	A table shall be provided that identifies each agency with jurisdiction to issue applicable permits, leases, and approvals or to enforce identified laws; regulations; standards; and adopted local, regional, state, and federal land use plans. The table shall also identify agencies that would have permit approval or enforcement authority but for the exclusive authority of the Commission to certify sites and related facilities.
Appendix B (i) (2)	The name, title, phone number, address (required), and email address (if known), of an official who was contacted within each agency, and provide the name of the official who will serve as a contact person for Commission staff.	TN 248288-4: DEIR Aesthetics Section 3.2.2.3 Regulatory Setting  TN 248320-13: Visual Resources Report Rev. 2, Section 4.1 Regulatory Setting	No	The name, title, phone number, address (required), and email address (if known), of an official who was contacted within each agency shall be provided. The name of the official who will serve as a contact person for Commission staff shall also be provided.
Appendix B (i) (3)	A schedule indicating when permits outside the authority of the Commission will be obtained and the steps the applicant has taken or plans to take to obtain such permits.	TN 248288-4: DEIR Aesthetics Section 3.2.2.3 Regulatory Setting	No	A schedule indicating when permits outside the authority of the Commission will be obtained and

Adequacy Issue: Adequate \_\_\_\_\_ Inadequate  X   
 Technical Area:  Visual Resources   
 Project Manager:  Lon Payne

**DATA ADEQUACY WORKSHEET**  
 Project:  Fountain Wind Project   
 Docket:  01-OPT-23

Revision No. \_\_\_\_\_ Date \_\_\_\_\_  
 Technical Staff:  Michael Clayton   
 Technical Senior:  Steve Kerr

SITING REGULATIONS	INFORMATION	AFC PAGE NUMBER AND SECTION NUMBER	ADEQUATE YES OR NO	INFORMATION REQUIRED TO MAKE AFC CONFORM WITH REGULATIONS
		TN 248320-13: Visual Resources Report Rev. 2, Section 4.1 Regulatory Setting		the steps the applicant has taken or plans to take to obtain such permits shall be provided.

Adequacy Issue: Adequate \_\_\_\_\_ Inadequate **X**  
 Technical Area: **Waste Management**  
 Project Manager: Leonidas Payne

**DATA ADEQUACY WORKSHEET**  
 Project: **Fountain Wind Project**  
 Docket: 23-OPT-01

Revision No. 1 Date 1/25/2023  
 Technical Staff: Mike Turner/Aurie Patterson  
 Technical Senior: Karim Abulaban/Brett Fooks

<b>SITING REGULATIONS</b>	<b>INFORMATION</b>	<b>AFC PAGE NUMBER AND SECTION NUMBER</b>	<b>ADEQUATE YES OR NO</b>	<b>INFORMATION REQUIRED TO MAKE AFC CONFORM WITH REGULATIONS</b>
Appendix B (b) (1) (C)	A detailed description of the design, construction, and operation of the facilities, specifically including the power generation, cooling, water supply and treatment, waste handling and control, pollution control, fuel handling, and safety, emergency and auxiliary systems, and fuel types and fuel use scenarios; and	DEIR 2.4.4.2 Temp Construction and Eq Areas  DEIR 2.4.8 Water, Wastewater, and Haz Materials	Yes	
Appendix B (e) (1)	A discussion of how facility closure will be accomplished in the event of premature or unexpected cessation of operations.	DEIR 2.4. Decommissioning and Site Restoration	Yes	
Appendix B (g) (1)	...provide a discussion of the existing site conditions, the expected direct, indirect, and cumulative impacts due to the construction, operation and maintenance of the project, the measures proposed to mitigate adverse environmental impacts of the project, the effectiveness of the proposed measures, and any monitoring plans proposed to verify the effectiveness of the mitigation.	Existing Conditions: DEIR Section 3.11 Hazardous Materials Subsection 3.11.1 Setting;  Expected Impacts: DEIR Section 3.11 Hazardous Materials Subsection 3.11.3  Direct and Indirect Effects: DEIR Section 3.11 Hazardous Materials Subsection 3.11.4 Cumulative Analysis;  Mitigation Measure: MM 3.11-3.	Yes	

Adequacy Issue: Adequate \_\_\_\_\_ Inadequate **X**  
 Technical Area: **Waste Management**  
 Project Manager: Leonidas Payne

**DATA ADEQUACY WORKSHEET**  
 Project: **Fountain Wind Project**  
 Docket: 23-OPT-01

Revision No. 1 Date 1/25/2023  
 Technical Staff: Mike Turner/Aurie Patterson  
 Technical Senior: Karim Abulaban/Brett Fooks

<b>SITING REGULATIONS</b>	<b>INFORMATION</b>	<b>AFC PAGE NUMBER AND SECTION NUMBER</b>	<b>ADEQUATE YES OR NO</b>	<b>INFORMATION REQUIRED TO MAKE AFC CONFORM WITH REGULATIONS</b>
Appendix B (g) (12) (A)	A Phase I Environmental Site Assessment (ESA) for the proposed power plant site using methods prescribed by the American Society for Testing and Materials (ASTM) document entitled "Standard Practice for Environmental Site Assessments: Phase 1 Environmental Site Assessment Process" (Designation: E 1527-93, May 1993), which is incorporated by reference in its entirety; or an equivalent method agreed upon by the applicant and Commission staff that provides similar documentation of the potential level and extent of site contamination. The Phase I ESA shall have been completed no earlier than one year prior to the filing of the AFC.	DEIR Appendix F1 (Phase I ESA): Stantec Consulting Services, Inc. 2019. Environmental Records Review. February 20.	No	The Phase I ESA provided in DEIR Appendix F1 is incomplete. Provide a complete Phase I Environment Site Assessment per ASTM E 1527
Appendix B (g) (12) (B)	A description of each waste stream estimated to be generated during project construction and operation, including origin, hazardous or nonhazardous classification pursuant to Title 22, California Code of Regulations, § 66261.20 et seq., chemical composition, estimated annual weight or volume generated, and estimated frequency of generation.	Management Methods: DEIR Section 3.11.3 Direct and Indirect Effects.	No	Per applicant: A Hazardous Materials Business Plan is a requirement of CCR Title 19, Division 2, Chapter 4 and will be prepared prior to construction. Construction is anticipated to balance cut and fill using onsite materials.  Please provide a Hazardous Materials Business Plan which includes the information listed.  In addition, the applicant provided only a brief discussion of solid waste generated during construction, operation, and decommissioning. However, no detail was provided for how much waste would be generated for each stage and what would be classified as hazardous vs non-hazardous. Provide further detail of the waste types and characteristics for construction, operation, and decommissioning.

Adequacy Issue: Adequate \_\_\_\_\_ Inadequate **X**

Technical Area: **Waste Management**

Project Manager: Leonidas Payne

**DATA ADEQUACY WORKSHEET**

Project: **Fountain Wind Project**

Docket: 23-OPT-01

Revision No. 1 Date 1/25/2023

Technical Staff: Mike Turner/Aurie Patterson

Technical Senior: Karim Abulaban/Brett Fooks

SITING REGULATIONS	INFORMATION	AFC PAGE NUMBER AND SECTION NUMBER	ADEQUATE YES OR NO	INFORMATION REQUIRED TO MAKE AFC CONFORM WITH REGULATIONS
Appendix B (g) (12) (C)	A description of all waste disposal sites which may feasibly be used for disposal of project wastes. For each site, include the name, location, classification under California Code of Regulations, title 23, section 2530 et seq., the daily or annual permitted capacity, daily or annual amounts of waste currently being accepted, the estimated closure date and remaining capacity, and a description of any enforcement action taken by local or state agencies due to waste disposal activities at the site.	--- Not Located ---	No	Provide details
Appendix B (g) (12) (D)	A description of management methods for each waste stream, including methods used to minimize waste generation, length of on- and off-site waste storage, re-use and recycling opportunities, waste treatment methods used, and use of contractors for treatment.	Management Methods: Shasta County DEIR Section 3.11.3 Direct and Indirect Effects.	Yes	
Appendix B (h) (1) (B)	A discussion of any measures proposed to improve adverse site conditions.	Project Description and Executive Summary Section 1.2.1 Site Selection	No	Provide discussion
Appendix B (h) (1) (D) (v)	The waste disposal system and on-site disposal sites;	Crosswalk Matrix, Engineering (h), Facility Design (1), (D)	Yes	The applicant indicates this is not applicable to a wind project.

Adequacy Issue: Adequate \_\_\_\_\_ Inadequate **X**  
 Technical Area: **Waste Management**  
 Project Manager: Leonidas Payne

**DATA ADEQUACY WORKSHEET**  
 Project: **Fountain Wind Project**  
 Docket: 23-OPT-01

Revision No. 1 Date 1/25/2023  
 Technical Staff: Mike Turner/Aurie Patterson  
 Technical Senior: Karim Abulaban/Brett Fooks

<b>SITING REGULATIONS</b>	<b>INFORMATION</b>	<b>AFC PAGE NUMBER AND SECTION NUMBER</b>	<b>ADEQUATE YES OR NO</b>	<b>INFORMATION REQUIRED TO MAKE AFC CONFORM WITH REGULATIONS</b>
Appendix B (i) (1) (A)	Tables that identify laws, regulations, ordinances, standards, adopted local, regional, state, and federal land use plans, leases, and permits applicable to the proposed project, and a discussion of the applicability of, and conformance with each. The table or matrix shall explicitly reference pages in the application wherein conformance, with each law or standard during both construction and operation of the facility is discussed; and	DEIR Section 3.11.1.3; includes descriptions of applicable LORS but does not include a table or matrix referencing pages in the application wherein conformance with each LORS	No	Provide table
Appendix B (i) (1) (B)	Tables that identify each agency with jurisdiction to issue applicable permits, leases, and approvals or to enforce identified laws, regulations, standards, and adopted local, regional, state, and federal land use plans, and agencies that would have permit approval or enforcement authority, but for the exclusive authority of the Commission to certify sites and related facilities.	DEIR Section 3.11.1.3; includes descriptions of applicable LORS but does not include table of agencies.	No	Provide table
Appendix B (i) (2)	The name, title, phone number, address (required), and email address (if known), of an official who was contacted within each agency, and provide the name of the official who will serve as a contact person for Commission staff.	DEIR Section 3.11.1.3; includes descriptions of applicable LORS but does not include contact information.	No	Provide information
Appendix B (i) (3)	A schedule indicating when permits outside the authority of the Commission will be obtained and the steps the applicant has taken or plans to take to obtain such permits.	--- Not Located ---	No	Provide schedule

Adequacy Issue: Adequate \_\_\_\_\_ Inadequate **X**  
 Technical Area: **Water Resources**  
 Project Manager: Leonidas Payne

**DATA ADEQUACY WORKSHEET**  
 Project: **Fountain Wind Project**  
 Docket: 23-OPT-01

Revision No. \_\_\_\_\_ Date 2/1/2023  
 Technical Staff: James Ackerman  
 Technical Senior: Karim Abulaban

SITING REGULATIONS	INFORMATION	AFC PAGE NUMBER AND SECTION NUMBER	ADEQUATE YES OR NO	INFORMATION REQUIRED TO MAKE AFC CONFORM WITH REGULATIONS
Appendix B (g) (1)	...provide a discussion of the existing site conditions, the expected direct, indirect and cumulative impacts due to the construction, operation and maintenance of the project, the measures proposed to mitigate adverse environmental impacts of the project, the effectiveness of the proposed measures, and any monitoring plans proposed to verify the effectiveness of the mitigation.	DEIR Section 3.12 Pages: 3.12-1 thru 3.12-25	Yes	
Appendix B (g) (14) (A)	All the information required to apply for the following permits, if applicable, including:	DEIR Section 3.12 Pages: 3.12-1 thru 3.12-25	Yes	
Appendix B (g) (14) (A) (i)	Waste Discharge Requirements; National Pollutant Discharge Elimination System Permit; and/or a Section 401 Certification or Waiver from the appropriate Regional Water Quality Control Board (RWQCB);	Section 3.12.1.3 Regulatory Setting/Regional/NPDES Construction General Permit Pages: 3.12-9	Yes	
Appendix B (g) (14) (A) (ii)	Construction and Industrial Waste Discharge or Industrial Pretreatment permits from wastewater treatment agencies;	Section 3.12.1.3 Regulatory Setting/Regional/NPDES Construction General Permit Pages: 3.12-9	Yes	
Appendix B (g) (14) (A) (iii)	Nationwide Permits and/or Section 404 Permits from the U.S. Army Corps of Engineers; and	Section 3.12.1.3 Regulatory Setting/Federal/Clean Water Act Pages: 3.12-4 thru 3.12-6	Yes	
Appendix B (g) (14) (A) (iv)	Underground Injection Control Permit(s) from the U.S. Environmental Protection Agency, California Division of Oil and Gas, and RWQCB.	N/A		

Adequacy Issue: Adequate \_\_\_\_\_ Inadequate **X**  
 Technical Area: **Water Resources**  
 Project Manager: Leonidas Payne

**DATA ADEQUACY WORKSHEET**  
 Project: **Fountain Wind Project**  
 Docket: **23-OPT-01**

Revision No. \_\_\_\_\_ Date 2/1/2023  
 Technical Staff: James Ackerman  
 Technical Senior: Karim Abulaban

SITING REGULATIONS	INFORMATION	AFC PAGE NUMBER AND SECTION NUMBER	ADEQUATE YES OR NO	INFORMATION REQUIRED TO MAKE AFC CONFORM WITH REGULATIONS
Appendix B (g) (14) (B)	A detailed description of the hydrologic setting of the project. The information shall include a narrative discussion and on maps at a scale of 1:24,000 (or appropriate scale approved by staff), describing the chemical and physical characteristics of the following nearby water bodies that may be affected by the proposed project:	Figure 3.12-1 Page: 3.12-3	No	"Surface Waters and Hydrology" figure has an estimated scale of 1":1.56 mi., or 1:98842 If practical, provide map in proper scale (1:24,000) or better.
Appendix B (g) (14) (B) (i)	Ground water bodies and related geologic structures;	Section 3.12.1.2, <i>Groundwater</i> Pages: 3.12-2 & 3.12-4 Figure 3.9-1 Page: 3.9-2	Yes	
Appendix B (g) (14) (B) (ii)	Surface water bodies;	Section 3.12.1.2, <i>Surface Water Hydrology</i> Page: 3.12-2 Figure 3.12-1 Page: 3.12-3	Yes	
Appendix B (g) (14) (B) (iii)	Water inundation zones, such as the 100-year flood plain and tsunami run-up zones;	N/A		
Appendix B (g) (14) (B) (iv)	Flood control facilities (existing and proposed); and	N/A		
Appendix B (g) (14) (B) (v)	Groundwater wells within ½ mile if the project will include pumping.	Section 3.15.1.2, <i>Water Supply</i> Page: 3.15-1	No	No list or figure identifying active groundwater wells within ½ mile of the project area.
Appendix B (g) (14) (C)	A description of the water to be used and discharged by the project. This information shall include:	Section 3.15.1.2, <i>Water Supply</i> Pages: 3.12-2 & 3.12-4 Section 3.15.1.2, <i>Wastewater Services</i> Page: 3.15-1 & 3.15-2	Yes	
Appendix B (g) (14) (C) (i)	Source(s) of the primary and back-up water supplies and the rationale for their selection;	DEIR Appendix I, Water Supply Assessment	Yes	



Adequacy Issue: Adequate \_\_\_\_\_ Inadequate **X**  
 Technical Area: **Water Resources**  
 Project Manager: Leonidas Payne

**DATA ADEQUACY WORKSHEET**  
 Project: **Fountain Wind Project**  
 Docket: 23-OPT-01

Revision No. \_\_\_\_\_ Date 2/1/2023  
 Technical Staff: James Ackerman  
 Technical Senior: Karim Abulaban

SITING REGULATIONS	INFORMATION	AFC PAGE NUMBER AND SECTION NUMBER	ADEQUATE YES OR NO	INFORMATION REQUIRED TO MAKE AFC CONFORM WITH REGULATIONS
Appendix B (g) (14) (C) (ii)	The expected physical and chemical characteristics of the source and discharge water(s) including identification of both organic and inorganic constituents before and after any project-related treatment. For source waters with seasonal variation, provide seasonal ranges of the expected physical and chemical characteristics. Provide copies of background material used to create this description (that is, laboratory analysis);	Section 3.12.1.2, <i>Water Quality</i> Page: 3.12-2 Section 3.15.1.2, <i>Water Supply</i> Pages: 3.12-2 & 3.12-4 Section 3.15.1.2, <i>Wastewater Services</i> Page: 3.15-1 & 3.15-2 DEIR Appendix I, Water Supply Assessment	No	Neither section includes details of the physical and chemical characteristics of source or discharge waters.
Appendix B (g) (14) (C) (iii)	Average and maximum daily and annual water demand and waste water discharge for both the construction and operation phases of the project;	Section 3.15.3.2, <i>Direct and Indirect Effects of the Project</i> Page: 3.15-7 DEIR Appendix I, Water Supply Assessment	Yes	
Appendix B (g) (14) (C) (iv)	A detailed description of all facilities to be used in water conveyance (from primary source to the power plant site), water treatment, and wastewater discharge. Include a water mass balance diagram;	Section 3.15.1.2, <i>Water Supply</i> Pages: 3.12-2 & 3.12-4 Section 3.15.3.2, <i>Direct and Indirect Effects of the Project</i> Page: 3.15-7 DEIR Appendix I, Water Supply Assessment	Yes	

Adequacy Issue: Adequate \_\_\_\_\_ Inadequate **X**  
 Technical Area: **Water Resources**  
 Project Manager: Leonidas Payne

**DATA ADEQUACY WORKSHEET**  
 Project: **Fountain Wind Project**  
 Docket: 23-OPT-01

Revision No. \_\_\_\_\_ Date 2/1/2023  
 Technical Staff: James Ackerman  
 Technical Senior: Karim Abulaban

SITING REGULATIONS	INFORMATION	AFC PAGE NUMBER AND SECTION NUMBER	ADEQUATE YES OR NO	INFORMATION REQUIRED TO MAKE AFC CONFORM WITH REGULATIONS
Appendix B (g) (14) (C) (v)	For all water supplies intended for industrial uses to be provided from public or private water purveyors, a letter of intent or will-serve letter indicating that the purveyor is willing to serve the project, has adequate supplies available for the life of the project, and any conditions or restrictions under which water will be provided. If a will-serve letter or letter of intent cannot be provided, identify the most likely water purveyor and discuss the necessary assurances from the water purveyor to serve the project;		No	No "Letter of Intent" or "Will-Serve Letter" from the water purveyor was provided.
Appendix B (g) (14) (C) (vi)	For all water supplied which necessitates transfers and/or exchanges at any point, identify all parties and contracts/agreements involved, the primary source for the transfer and/or exchange water (that is, surface water, groundwater), and provide the status of all appropriate agencies' approvals for the proposed use, environmental impact analysis on the specific transfers or exchanges required to obtain the proposed supplies, a copy of any agency regulations that govern the use of the water, and an explanation of how the project complies with the agency regulation(s);	Section 3.15.1.2, <i>Water Supply</i> Pages: 3.12-2 & 3.12-4 Section 3.15.3.2, <i>Direct and Indirect Effects of the Project</i> Page: 3.15-7 DEIR Appendix I, Water Supply Assessment Burney Water District Correspondence (TN248320-14)	No	The Burney Water District is identified as the water purveyor in the area. There is a series of emails that document the applicant's efforts in obtaining a "will serve letter" from the water district, however, there appear to be no contract or agreement documents included.
Appendix B (g) (14) (C) (vii)	Provide water mass balance and heat balance diagrams for both average and maximum flows that include all process or ancillary water supplies and wastewater streams. Highlight any water conservation measures on the diagram and the amount that they reduce water demand; and			

Adequacy Issue: Adequate \_\_\_\_\_ Inadequate **X**  
 Technical Area: **Water Resources**  
 Project Manager: Leonidas Payne

**DATA ADEQUACY WORKSHEET**  
 Project: **Fountain Wind Project**  
 Docket: 23-OPT-01

Revision No. \_\_\_\_\_ Date 2/1/2023  
 Technical Staff: James Ackerman  
 Technical Senior: Karim Abulaban

SITING REGULATIONS	INFORMATION	AFC PAGE NUMBER AND SECTION NUMBER	ADEQUATE YES OR NO	INFORMATION REQUIRED TO MAKE AFC CONFORM WITH REGULATIONS
Appendix B (g) (14) (C) (viii)	<p>For all projects which have a discharge, provide a copy of the will-serve letter, permit or contract with the public or private entity that will be accepting the wastewater and contact storm water from the project. The letter, permit or contract, if possible, shall identify the discharge volumes and the chemical or physical characteristics under which the wastewater and contact storm water will be accepted.</p> <p>In the event that a will-serve letter, permit, or contract cannot be provided, identify the most likely wastewater/storm water entity and discuss why the applicant was unable to secure the necessary assurances to serve the project's wastewater/storm water needs. Also, discuss the term of the wastewater service to the project, whether the wastewater entity has adequate permit capacity for the volume of wastewater from the project and has adequate permit levels for the chemical/physical characteristics of the project's wastewater and storm water for the life of the project, and any issues or conditions/restrictions the wastewater entity may impose on the project.</p>	<p>Section 3.12.1.3 <i>Regulatory Setting/Federal/Clean Water Act</i>            Pages: 3.12-4 thru 3.12-6            Section 3.12.1.3 <i>Regulatory Setting/Regional/NPDES Construction General Permit</i>            Pages: 3.12-9            Section 3.15.1.2 <i>Utilities and Service Systems, Setting, Environmental Setting, Wastewater Service</i>            Pages: 3.15-1 &amp; 3.15-2</p>	No	<p>The Central Valley RWQCB is the agency identified oversight of the General NPDES permit.            No "Will-Serve Letter" for wastewater discharge services.            According to Section 3.15.1.2, the project site is not served by wastewater infrastructure.</p>
Appendix B (g) (14) (D)	Identify all project elements associated with stormwater drainage, including a description of the following:	<p>Section 3.12.1.2, <i>Environmental Setting, Climate, Precipitation, and Site Topography</i>            Pages: 3.12-1</p>	Yes	

Adequacy Issue: Adequate \_\_\_\_\_ Inadequate **X**  
 Technical Area: **Water Resources**  
 Project Manager: Leonidas Payne

**DATA ADEQUACY WORKSHEET**  
 Project: **Fountain Wind Project**  
 Docket: 23-OPT-01

Revision No. \_\_\_\_\_ Date 2/1/2023  
 Technical Staff: James Ackerman  
 Technical Senior: Karim Abulaban

SITING REGULATIONS	INFORMATION	AFC PAGE NUMBER AND SECTION NUMBER	ADEQUATE YES OR NO	INFORMATION REQUIRED TO MAKE AFC CONFORM WITH REGULATIONS
Appendix B (g) (14) (D) (i)	Monthly and seasonal precipitation and stormwater runoff and drainage patterns for the proposed site and surrounding area that may be affected by the project's construction and operation;	Section 3.12.1.2, <i>Environmental Setting, Climate, Precipitation, and Site Topography</i> Pages: 3.12-1	Yes	
Appendix B (g) (14) (D) (ii)	Drainage facilities and the design criteria used for the plant site and ancillary facilities, including but not limited to capacity of designed system, design storm, and estimated runoff;		No	No documents in the docket that address stormwater management system were provided.
Appendix B (g) (14) (D) (iii)	All assumptions and calculations used to calculate runoff and to estimate changes in flow rates between pre- and post-construction; and		No	No documents in the docket that address stormwater management system were provided.
Appendix B (g) (14) (D) (iv)	A copy of applicable regional and local requirements regulating the drainage systems, and a discussion of how the project's drainage design complies with these requirements.	Section 3.12.1.3, <i>Regulatory Setting</i> Pages: 3.12-4 thru 3.12-10	Yes	
Appendix B (g) (14) (E)	An impacts analysis of the proposed project on water resources and a discussion of conformance with water-related LORS and policy. This discussion shall include:	Section 3.12.3 <i>Direct and indirect Effects</i> Pages: 3.12-11 thru 3.12-23 Section 3.12.4 <i>Cumulative Analysis</i> Pages: 3.12-23 and 3.12-24	Yes	

Adequacy Issue: Adequate \_\_\_\_\_ Inadequate **X**  
 Technical Area: **Water Resources**  
 Project Manager: Leonidas Payne

**DATA ADEQUACY WORKSHEET**  
 Project: **Fountain Wind Project**  
 Docket: 23-OPT-01

Revision No. \_\_\_\_\_ Date 2/1/2023  
 Technical Staff: James Ackerman  
 Technical Senior: Karim Abulaban

SITING REGULATIONS	INFORMATION	AFC PAGE NUMBER AND SECTION NUMBER	ADEQUATE YES OR NO	INFORMATION REQUIRED TO MAKE AFC CONFORM WITH REGULATIONS
Appendix B (g) (14) (E) (i)	The effects of project demand on the water supply and other users of this source, including, but not limited to, water availability for other uses during construction or after the power plant begins operation, consistency of the water use with applicable RWQCB basin plans or other applicable resource management plans, and any changes in the physical or chemical conditions of existing water supplies as a result of water use by the power plant;	Section 3.12.3 <i>Direct and indirect Effects</i> Pages: 3.12-11 thru 3.12-23 Section 3.12.4 <i>Cumulative Analysis</i> Pages: 3.12-23 and 3.12-24	Yes	
Appendix B (g) (14) (E) (ii)	If the project will pump groundwater, an estimation of aquifer drawdown based on a computer modeling study shall be conducted by a professional geologist and include the estimated drawdown on neighboring wells within 0.5 mile of the proposed well(s), any effects on the migration of groundwater contaminants, and the likelihood of any changes in existing physical or chemical conditions of groundwater resources shall be provided;		No	Groundwater is discussed as a possible water supply in Section 3.15, but no drawdown analysis or modeling was provided.
Appendix B (g) (14) (iii)	The effects of construction activities and plant operation on water quality and to what extent these effects could be mitigated by best management practices;	Section 3.12.3 <i>Direct and indirect Effects</i> Pages: 3.12-11 thru 3.12-23 Section 3.12.4 <i>Cumulative Analysis</i> Pages: 3.12-23 and 3.12-24	Yes	

Adequacy Issue: Adequate \_\_\_\_\_ Inadequate **X**  
 Technical Area: **Water Resources**  
 Project Manager: Leonidas Payne

**DATA ADEQUACY WORKSHEET**  
 Project: **Fountain Wind Project**  
 Docket: 23-OPT-01

Revision No. \_\_\_\_\_ Date 2/1/2023  
 Technical Staff: James Ackerman  
 Technical Senior: Karim Abulaban

SITING REGULATIONS	INFORMATION	AFC PAGE NUMBER AND SECTION NUMBER	ADEQUATE YES OR NO	INFORMATION REQUIRED TO MAKE AFC CONFORM WITH REGULATIONS
Appendix B (g) (14) (iv)	If not using a zero liquid discharge project design for cooling and process waters, include the effects of the proposed wastewater disposal method on receiving waters, the feasibility of using pre-treatment techniques to reduce impacts, and beneficial uses of the receiving waters. Include an explanation why the zero liquid discharge process is "environmentally undesirable," or "economically unsound;"	Section 3.15.3.2 <i>Utilities and Service Systems, Direct and Indirect Effects of the Project, Wastewater Service, Environmental Impact (b)</i> Pages: 3.15-8	No	No explanation was given as to why "Zero Liquid Discharge" process would not be used for wastewater disposal.
Appendix B (g) (14) (v)	If using fresh water, include a discussion of the cumulative impacts, alternative water supply sources and alternative cooling technologies considered as part of the project design. Include an explanation of why alternative water supplies and alternative cooling are "environmentally undesirable," or "economically unsound;"	Section 3.15.1.2, <i>Water Supply</i> Pages: 3.12-2 & 3.12-4 Section 3.15.3.2, <i>Direct and Indirect Effects of the Project</i> Page: 3.15-7 DEIR Appendix I, Water Supply Assessment Burney Water District Correspondence (TN248320-14)	Yes	
Appendix B (g) (14) (vi)	The effects of the project on the 100-year flood plain, flooding potential of adjacent lands or water bodies, or other water inundation zones; and	Section 3.12.3.2 <i>Hydrology and Water Quality, Direct and Indirect Effects of the Project, Environmental Impact (c)</i> Pages: 3.12-9 thru 3.12-21	Yes	
Appendix B (g) (14) (vii)	All assumptions, evidence, references, and calculations used in the analysis to assess these effects.	Section 3.12.3.2 <i>Hydrology and Water Quality, Direct and Indirect Effects of the Project, Environmental Impact (c)</i> Pages: 3.12-9 thru 3.12-21	No	Provide the requested information.

Adequacy Issue: Adequate \_\_\_\_\_ Inadequate **X**  
 Technical Area: **Water Resources**  
 Project Manager: Leonidas Payne

**DATA ADEQUACY WORKSHEET**  
 Project: **Fountain Wind Project**  
 Docket: 23-OPT-01

Revision No. \_\_\_\_\_ Date 2/1/2023  
 Technical Staff: James Ackerman  
 Technical Senior: Karim Abulaban

<b>SITING REGULATIONS</b>	<b>INFORMATION</b>	<b>AFC PAGE NUMBER AND SECTION NUMBER</b>	<b>ADEQUATE YES OR NO</b>	<b>INFORMATION REQUIRED TO MAKE AFC CONFORM WITH REGULATIONS</b>
Appendix B (i) (1) (A)	Tables that identify laws, regulations, ordinances, standards, adopted local, regional, state, and federal land use plans, leases, and permits applicable to the proposed project, and a discussion of the applicability of, and conformance with each. The table or matrix shall explicitly reference pages in the application wherein conformance, with each law or standard during both construction and operation of the facility is discussed; and		No	Table of applicable LORS
Appendix B (i) (1) (B)	Tables that identify each agency with jurisdiction to issue applicable permits, leases, and approvals or to enforce identified laws, regulations, standards, and adopted local, regional, state and federal land use plans, and agencies that would have permit approval or enforcement authority, but for the exclusive authority of the Commission to certify sites and related facilities.		No	Table of agencies and jurisdictions
Appendix B (i) (2)	The name, title, phone number, address (required), and email address (if known), of an official who was contacted within each agency, and provide the name of the official who will serve as a contact person for Commission staff.		No	List of governmental agencies.
Appendix B (i) (3)	A schedule indicating when permits outside the authority of the Commission will be obtained and the steps the applicant has taken or plans to take to obtain such permits.		No	Permit issuance schedule

Adequacy Issue: Adequate \_\_\_\_\_ Inadequate **X**  
 Technical Area: **Worker Safety**  
 Project Manager: Lon Payne

**DATA ADEQUACY WORKSHEET**  
 Project: **Fountain Wind Project**  
 Docket: 23-OPT-1

Revision No. \_\_\_\_\_ Date 01/31/23  
 Technical Staff: Aurie Patterson (ASPEN)  
 Technical Senior: Brett Fooks

SITING REGULATIONS	INFORMATION	AFC PAGE NUMBER AND SECTION NUMBER	ADEQUATE YES OR NO	INFORMATION REQUIRED TO MAKE AFC CONFORM WITH REGULATIONS
Appendix B (g) (1)	...provide a discussion of the existing site conditions, the expected direct, indirect and cumulative impacts due to the construction, operation and maintenance of the project, the measures proposed to mitigate adverse environmental impacts of the project, the effectiveness of the proposed measures, and any monitoring plans proposed to verify the effectiveness of the mitigation.	Not included	No	
Appendix B (g) (11) (A)	A description of the safety training programs that will be required for construction and operation personnel.	Not included.	No	A Health and Safety Plan should be prepared and included in Section 3.11.2 (Hazards and Hazardous Materials Direct and Indirect Effects) to reduce potential hazards to workers.
Appendix B (g) (11) (B)	A complete description of the fuel handling system and the fire suppression system.		No.	There is a good discussion of the fire suppression for the tower nacelles and project fire safety mitigation in the Wildfire Section (3.16.3.1). However, there is no discussion in the application materials as to fuel handling for the Project. Provide discussion of how and where fuel will be stored, used, and transported (including refueling of fuel storage tanks), equipment and vehicle refueling procedures.
Appendix B (g) (11) (C)	Provide draft outlines of the Construction Health and Safety Program and the Operation Health and Safety Program, as follows:	Not Provided as it pertains to Worker Health and Safety and Hazards and Hazardous Materials	No	Provide Construction and Operation Health and Safety Plans for worker safety.
	Construction Health and Safety Program: * Injury and Illness Prevention Plan (8 Cal. Code Regs., section 1509);			
	* Fire Protection and Prevention Plan (8 Cal. Code Regs., section 1920);			
	* Personal Protective Equipment Program (8 Cal. Code Regs., sections 1514-1522)			



Adequacy Issue: Adequate \_\_\_\_\_ Inadequate **X**  
 Technical Area: **Worker Safety**  
 Project Manager: Lon Payne

**DATA ADEQUACY WORKSHEET**  
 Project: **Fountain Wind Project**  
 Docket: 23-OPT-1

Revision No. \_\_\_\_\_ Date 01/31/23  
 Technical Staff: Aurie Patterson (ASPEN)  
 Technical Senior: Brett Fooks

SITING REGULATIONS	INFORMATION	AFC PAGE NUMBER AND SECTION NUMBER	ADEQUATE YES OR NO	INFORMATION REQUIRED TO MAKE AFC CONFORM WITH REGULATIONS
	Operation Health and Safety Program: * Injury and Illness Prevention Program (8 Cal. Code Regs., section 3203); * Fire Prevention Plan (8 Cal. Code Regs., section 3221); * Emergency Action Plan (8 Cal. Code Regs., section 3220); Personal Protective Equipment Program (8 Cal. Code Regs., sections 3401-3411).			
Appendix B (i) (1) (B)	Tables that identify each agency with jurisdiction to issue applicable permits, leases, and approvals or to enforce identified laws, regulations, standards, and adopted local, regional, state and federal land use plans, and agencies that would have permit approval or enforcement authority, but for the exclusive authority of the Commission to certify sites and related facilities.		No	Please provide the table for worker safety.
Appendix B (i) (2)	The name, title, phone number, address (required), and email address (if known), of an official who was contacted within each agency, and provide the name of the official who will serve as a contact person for Commission staff.		No	Please provide the agency contacts.
Appendix B (i) (3)	A schedule indicating when permits outside the authority of the Commission will be obtained and the steps the applicant has taken or plans to take to obtain such permits.		No	Please provide any permits that need to be obtain.

## Attachment B

CEC Data Requests on additional topics

## **CULTURAL RESOURCES**

Staff has reviewed the following cultural resource reports and documents prepared by Stantec Consulting Services Inc. for the Fountain Wind Energy Project and prepared the following data requests. Please also refer to CEC staff comments included in the Fountain Wind Project, Docket, 23-OPT-01, Data Adequacy Worksheet, Cultural Resources, Siting Regulations.

The below listed key documents are reviewed here in strict accordance with Appendix B, Information Requirements for an Application, guidelines. Based on receipt of various Data requested, additional documents may be subject to Data Requests.

- **20230111T150126\_Confidential Cultural Phase I Report**  
Stantec Consulting Services (Stantec), 2019. Fountain Wind Energy Project Cultural Resources Phase 1 Inventory of 4,463 Acres, Shasta County, California. Prepared for Fountain Wind LLC. December 2019.
- **TN248291-1\_20230103T125541\_Tribal Addendum**  
Stantec, 2020b. Addendum 2: Updated Cultural Resources Inventory Report: Tribal Coordination and Correspondence. Prepared for Fountain Wind LLC. March 23, 2020.
- **20230111T150116\_Confidential Cultural Survey Update-1**  
Fountain Wind Energy Project Cultural Resources Phase 1 Inventory of 4,463 Acres, Shasta County, California, Addendum 3: Supplemental Archaeological Survey, October 2020.
- **20230111T150100\_Confidential Cultural DPR Forms Pt1**  
CHRIS Record Search Results
- **20230111T150107\_Confidential Cultural DPR Forms Pt2**  
CHRIS Record Search Results
- **TN248288-8\_20230103T105258\_DEIR Cultural And Tribal Cultural Resources**  
Shasta County DEIR Section 3.6 Cultural Resources
- **TN248289-1\_20230103T113731\_FEIR Vol1 (1)**  
Shasta County FEIR pp. 1-14 to 1-15, Section 2.2.2 Responses to Comments from Tribal Entities and Members.

The following cultural document item listed by Stantec in the Crosswalk Matrix, TN248321\_20230104T140554\_Appendix B Opt-in Application Crosswalk Matrix, was not located.

- Addendum 1: Update to The Fountain Wind Energy Project Cultural Resources Phase 1 Inventory of 4,463 Acres, Shasta County, California. Prepared for Fountain Wind LLC. March 18, 2020

## **BACKGROUND**

In accordance with Appendix B (g) (2) (A), cultural documentation shall include "A summary of the ethnology, prehistory, and history of the region with emphasis on the area within no more than a 5-mile radius of the project location."

The DEIR and the Stantec Phase 1 Inventory provided for review contain sections on the ethnology, prehistory, and history of the region. The ethnography and prehistory portions appear as very limited, but the history sections appear to have not included potentially key data. By way of example, a cursory review of just historic General Land Office (GLO) maps ranging in age from 1868 to 1892, in just in a very small area straddling today's State Route 299, finds that various early named historic features including Ft. Crook Road, Cummeg's Toll Road (Stage Road), and Carberry's House are within or in the immediate vicinity of the Project Site. Agricultural fields are also shown. Independent historical research conducted by CEC staff in review of docketed reports was limited, but it does underscore the fact that the cultural documents provided for review do not reference the above-named historic features in their summaries of the history of the region. These are all within a 5-mile radius of the project location.

## **DATA REQUEST**

1. Please update the historic context, as presented in the Phase 1 cultural resources inventory report (Stantec 2019), to minimally include a discussion of the background history to provide for an understanding of various historic cultural resources and named historic features that are within no more than a 5-mile radius of the project location. The historic context shall discuss the role of California Native Americans in the project vicinity to reflect the high proportion of California Indians reported in the 1880 U.S. Census.

This update should take place following completion of an architectural/built environment survey and report by or under the direction of an NPS qualified Architectural Historian (See also Section Appendix B (g) (2) (C)).

## **BACKGROUND**

The original record search conducted by Stantec was for a 0.25-mile area surrounding the original project site. Current CEC guidelines require that cultural documentation shall include the results of a record search within an area not less than a 1-mile radius around the project site and not less than one-quarter (0.25) mile on each side of the linear facilities. CEC staff is unable to determine whether the original records search

covers the current project site as no Northeast Information Center request letter and USGS 7.5' map has been provided, and no USGS 7.5' map clearly delineating the location of the project site has been provided. The current project site is known to be smaller than the original project site, and it is understood that Stantec is evaluating whether or not the original records search boundary entirely covers the current project site.

## **DATA REQUEST**

2. This data request is made in addition to previously requested information in the Data Adequacy Worksheet. If Stantec staff determine that the original records search boundaries are inadequate, then Stantec shall conduct a new records search within an area not less than a 1-mile radius around the project site and not less than one-quarter (0.25) mile on each side of the linear facilities in accordance with CEC regulations, and provide all new documents, reports, and site records for review.

## **BACKGROUND**

The background data request below provide additional direction concerning Appendix B (g) (2) (C)'s requirement, "New historic architecture field surveys in rural areas shall be conducted inclusive of the project site and the project linear facility routes, extending no less than .5 mile out from the proposed plant site and from the routes of all above-ground linear facilities. New historic architecture field surveys in rural areas shall be conducted inclusive of the project site and the project linear facility routes, extending no less than .5 mile out from the proposed plant site and from the routes of all above-ground linear facilities. New historic architecture field reconnaissance ("windshield survey") in urban and suburban areas shall be conducted along the routes of all linear facilities to identify, inventory, and characterize structures and districts that appear to be older than 45 years or that are exceptionally significant, whatever their age."

No architectural/built environment survey is known to have been conducted, or at least no such survey report has been Docketed or specifically referenced as having been prepared in any key cultural document. Interestingly, the DEIR states on page 3.6-20 that "There are no impacts to historic architectural resources from the proposed Project."

CEC staff did review one document referring to the recordation of Built Environment features and sites, Docketed, TN248291-6\_20230103T125604\_Figure - Sites Built Before 1977, in apparent support of complying with requirements to identify 45+ year old historic properties. This document consists of one aerial map. Its use is limited as no architectural/built environment survey or research is known to have been conducted.

CEC staff conducted a cursory and non-exhaustive review of historic General Land Office (GLO) maps ranging in age from 1868 to 1892, in just in a very small area straddling today's State Route 299, finds that various early named historic features including Ft. Crook Road, Cummeg's Toll Road (Stage Road), and Carberry's House are within or in the immediate vicinity of the Project Site.

Table 1. Unrecorded Historic GLO Map Named Features Within or in Immediate Vicinity of Project Site

Historic Map Name and Date	Township, Range and Sections	Historic Property Name or Feature	Conclusions
1874 General Land Office (GLO) Map.	35N 1E Section 21 Section 22, Section 25, Section 26, Section 27	Section 21: N/S Trail + E/W Fort Crook Road  Section 22: Fort Crook Road cutting intersection Secs. 21, 22, 27, 28  Section 27: E/W Fort Crook Road + N/S Branch road off Fort Crook Road  Section 26: E/W Fort Crook Road  Section 25: E/W Fort Crook Road	The referenced independent historical research conducted by CEC staff in review of Docketed reports was non-exhaustive, but it does underscore the fact that the cultural documents provided for review do not reference these named historic features in their summaries of the history of the region.  Finally, there is no record of these potentially historic properties or features having been surveyed or referenced during preparation of an architectural and built environment survey report.
1868 GLO Map	35N 2E Section 30	Section 30: E/W Fort Crook Road	Same as above
1892 GLO Map	35N 2E Section 29 Section 30, Section 31, Section 32,	Section 29: "Wood Road"  Section 30: Stage Road – "Cummeg's Toll Road"  Section 31: Stage Road – "Cummeg's Toll Road"  Section 32: "Cummeg's Toll Road" + Carberry's House + Unnamed Road to Carberry's House.	Same as above.

Very preliminary research conducted by CEC staff reveals that considerable information is available from various historic newspapers regarding the above noted historic sites or properties. Carberry House was the residence of Judge Carberry (*San Francisco Call* 1895: 5), and Henry Cummegs, a resident of Montgomery Creek, is the individual associated with "Cummeg's Toll Road" (*Free Press* 1898, page 2).

CEC staff also reviewed historic USGS topo maps which identified many 70+ year old historic built environment features (primarily roads, trails, and highways) that do not appear to have been identified or recorded by Stantec. A brief and non-exhaustive review using [www.historicaerials.com](http://www.historicaerials.com) indicates that several of these roads and trails may survive, as well as small sections of the 1868-1892 GLO trails and roads referenced earlier. By way of example, potentially historic properties appearing on the historic 1956 *Montgomery Creek* USGS Quadrangle 1:62,500 scale map for just Township 35N Range 1 East includes but is not limited to the following.

- **35N 1E: *Montgomery Creek* 1956 USGS Map**
  - Section 25: Unimproved Road
  - Section 21: State Route 299, Unimproved Road
  - Section 22: State Route 299
  - Section 28: Unimproved Road
  - Section 27: State Route 299, various unimproved roads (one an access road), many structures in section + Moose Camp
  - Section 26: State Route 299
  - Section 25: State Route 299, State Route 299
  - Section 34: Unimproved roads and several structures.
  - Section 33: Unimproved roads

There appears to have been no recordation or very limited recordation of unnamed 45+ year old logging roads, historic fence lines, and historic agricultural and landscape features. Many roads and trails, and an “abandoned” road appear in photographs in the Cultural Resources Phase 1 Inventory of 4,463 Acres Administrative Draft report, or Addendum 3 to the Phase 1 Inventory. They are not recorded. Finally, Supan Road, Goat Creek Road, and Road 200T are mentioned by name/number in the Cultural Resources Phase 1 Inventory of 4,463 Acres Administrative Draft report but not evaluated.

Finally, CEC staff has prepared a USGS map depicting the Project Site on the 1995 *Hatchet Mountain Pass* and 1990 *Montgomery Creek*, Calif., 1:24,000 scale quadrangle maps. Using this map, staff have made a preliminary effort to determine if project construction impacts including turbine locations, linears, or construction access roads might impact unrecorded and potentially significant historic features. This effort has focused solely on historic Fort Crook Road and Cummeg’s Toll Road as identified by name on historic GLO maps. Not all available GLO maps information is presented below. The only purpose here is to demonstrate that potentially significant and unrecorded historic built environment resources might be impacted by the proposed project. This, as a means of underscoring the need for completing a historic architecture field survey and ARMR-compliant report inclusive of the project site and project linear facility routes, extending no less than 0.5 mile out from the proposed plant site and from the routes of all above-ground linear facilities. Many additional historic features not referenced below exist.

### **1874 General Land Office (GLO) Map - 35N 1E**

- Section 21: N/S Trail + E/W Fort Crook Road
  - An access road in this section appears to cross a segment of historic Fort Crook Road.
- Section 22: Fort Crook Road cutting intersection Secs. 21, 22, 27, 28
- Section 27: E/W Fort Crook Road + N/S Branch road off Fort Crook Road
  - An access road and another undefined construction location in this section appears to cross a segment of historic Fort Crook Road.
- Section 26: E/W Fort Crook Road
  - A linear in this section appears to cross a segment of historic Fort Crook Road.
- Section 25: E/W Fort Crook Road

### **1892 GLO Map - 35N 2E**

- Section 30: Stage Road – “Cummeg’s Toll Road”
  - It would appear that a small section of historic “Cummeg’s Toll Road” may be impacted by a turbine location.
- Section 31: Stage Road – “Cummeg’s Toll Road”
  - It would appear that a small section of historic “Cummeg’s Toll Road” may be impacted by a turbine location and an access road.
- Section 32: “Cummeg’s Toll Road” + Carberry’s House + Unnamed Road to Carberry’s House.
  - It would appear that a small section of historic Cummeg’s Toll Road may be impacted by an access road.

**Note:** All the above determinations using historic GLO maps are accurate within certain limits depending, among many other things, on the skills of the historic surveyor, terrain topography, and visibility or line-of-sight. Early GLO surveyors frequently made a best guess as to exactly where they were. In general, the “shape” of an historic road or trail is a key to compare an alignment depicted on early GLO maps to an alignment depicted on much more recent USGS maps.

### **DATA REQUEST**

3. If an architectural field survey has been conducted and a built environment cultural resources compliance report previously prepared in accordance with Appendix B guidelines, then please provide this report for review.
  - If an architectural field survey has not been conducted and a built environment cultural resources compliance report not previously prepared, then please conduct a historic architecture field survey inclusive of the project site and the project linear facility routes, extending no less than .5 mile out from the proposed plant site and from the routes of all above-ground linear



- facilities. A Secretary of the Interior-qualified historian or architectural historian shall conduct or oversee this survey and shall be listed as the author of the report prepared.
- Please include State Route 299 in the built environment report. Confer with entities knowledgeable about the history of State Route 299, such as the California Department of Transportation and the Pit River Tribe (specifically Brandy McDaniels).
  - This report should comply with ARMR guidelines per Siting Regulation Appendix B (g) (2) (C).
  - It is further suggested that the report also be prepared in consideration of guidelines as outlined in Caltrans Volume 2 -Standard Environmental Reference, Chapter 6; Built Environment Cultural Resources Evaluation and Treatment, 2019 Update rev: 07/15/20 built environment features. Please evaluate all highways, roads, and trails in consideration of *A Historical Context and Methodology for Evaluating Trails, Roads, and Highways in California*, prepared by Caltrans, Sacramento, 2016.
  - The applicant may choose to combine the historic built environment inventory report with the Phase 1 cultural resources report and addenda for convenience of use by others and to ensure a comprehensive treatment of all types of cultural resources in the project area.

## **BACKGROUND**

In accordance with Appendix B (g) (2) (C) (i), cultural documentation shall include “The summary from Appendix B (g)(2)(A) and the literature search results from Appendix B (g)(2)(B).”

Based on data inadequacies previously identified by staff these procedures and methodologies require updating.

## **DATA REQUEST**

4. Please Provide revised summary of literature search results from Appendix B(g)(2)(B).

## **BACKGROUND**

In accordance with Appendix B (g) (2) (C) (ii) cultural documentation shall include “The survey procedures and methodology used to identify cultural resources and a discussion of the resources identified by the survey.”

Based on data inadequacies previously identified by staff these procedures and methodologies require updating.

## **DATA REQUEST**

5. Please provide a revised discussion of survey procedures, methods used to identify and evaluate cultural resources, and CEQA implications, incorporating information from the historic architecture survey. This discussion must include a version that excludes confidential cultural resources information to facilitate responsible public disclosure.

## **BACKGROUND**

In accordance with Appendix B (g) (2) (C) (iii), cultural documentation shall include "Copies of all new and updated DPR 523(A) forms. If a cultural resource may be impacted by the project, also include the appropriate DPR 523 detail form for each such resource."

New site records were provided for review in a document entitled: Confidential DPR Forms Pt1 20230111T150100. These sites were discovered by Stantec during a survey of the Fountain Wind Energy Project 4,463 Acre Project Site. The report citation listed throughout on each form is: Stantec 2019, Cultural Resources Inventory and Evaluation for the Kudu Solar Project, Kern County, California. This citation is incorrect and is very confusing to the reader of the new DPR 523 site record.

## **DATA REQUEST**

6. Please revise the report citation on all newly recorded sites to reflect the appropriate report and Please provide copies of all new DPR 523 forms completed as part of the historic built environment survey required under Appendix B(g)(2)(C).

## **BACKGROUND**

In accordance with Appendix B (g) (2) (C) (iv) cultural documentation shall include "A map at a scale of 1:24,000 U.S. Geological Survey quadrangle depicting the locations of all previously known and newly identified cultural resources compiled through the research required by Appendix B (g)(2)(B) and Appendix B (g)(2)(C) (ii)."

This map was not provided.

Based on data inadequacies previously identified by staff the any provided using existing information may have to be updated say, for example, if a new NEIC Records Search request requires extending the existing 0.25-mile buffer surrounding the Project Site to a 1-mile buffer surrounding the Project Site as currently required by CEC.

## **DATA REQUESTS**

7. Please provide a map at a scale of 1:24,000 U.S. Geological Survey quadrangle depicting the locations of all previously known and newly identified cultural resources compiled through the research required by Appendix B (g)(2)(B) and Appendix B (g)(2)(C) (ii).
8. Please provide resumes of all personnel involved in the Phase 1 Inventory and any other addenda or reports in TN248291-5\_20230103T125603 Cultural Report Author Qualifications, inclusive of a Secretary of the Interior-qualified architectural historian responsible for completing the missing architectural/built environment literature review and survey in accordance with Appendix B (g) (2) (C) (v).

## **BACKGROUND**

In accordance with Appendix B (i) (3) a schedule indicating when permits outside the authority of the commission will be obtained and the steps the applicant has taken or plans to take to obtain such permits is required.

## **DATA REQUEST**

9. If the requested architectural/built environment survey will require valid permits to conduct the survey (i.e. Forest Service permits), please update the Phase 1 Inventory report to include information indicating when permits outside the authority of the commission will be obtained and the steps the applicant has taken or plans to take to obtain such permits.

## **BACKGROUND**

CEC staff could not find a clear discussion about the depth of all proposed ground disturbance or grading of any access roads.

Based on preliminary research as previously discussed, several access roads may in fact be considered historical resources.

## **DATA REQUEST**

10. Revise the cultural report to include the location(s) of all ground disturbing activity proposed as part of the project and the depth of each identified disturbance including grading and proposed realignment of any identified access roads.

## **REFERENCES CITED**

## **Docketed Items**

20230111T150126\_Confidential Cultural Phase I Report  
*Fountain Wind Energy Project Cultural Resources Phase 1 Inventory of 4,463 Acres, Shasta County, California.* Prepared for: Fountain Wind LLC, Prepared by: Stantec Consulting Services Inc., December 6, 2019.

TN248291-1\_20230103T125541\_Tribal Addendum  
Stantec, 2020b. Addendum 2: Updated Cultural Resources Inventory Report: Tribal Coordination and Correspondence. Prepared for Fountain Wind LLC. March 23, 2020.

20230111T150116\_Confidential Cultural Survey Update-1  
Fountain Wind Energy Project Cultural Resources Phase 1 Inventory of 4,463 Acres, Shasta County, California, Addendum 3: Supplemental Archaeological Survey, October 2020.

20230111T150100\_Confidential Cultural DPR Forms Pt1  
CHRIS Record Search Results

20230111T150107\_Confidential Cultural DPR Forms Pt2  
CHRIS Record Search Results

TN248288-8\_20230103T105258\_DEIR Cultural And Tribal Cultural Resources  
Shasta County DEIR Section 3.6 Cultural Resources

TN248289-1\_20230103T113731\_FEIR Vol1 (1)  
Shasta County FEIR pp. 1-14 to 1-15, Section 2.2.2 Responses to Comments from Tribal Entities and Members.

## **Books, Reports, and Guidelines**

Caltrans 2020      Caltrans Volume 2 -Standard Environmental Reference, Chapter 6;  
Built Environment Cultural Resources Evaluation and Treatment, 2019 Update rev:  
07/15/20 built environment features.

Caltrans 2016      *A Historical Context and Methodology for Evaluating Trails, Roads,  
and Highways in California*, Prepared for: Cultural Studies Office Division of  
Environmental Analysis California Department of Transportation, Sacramento,  
California, 2016.

OHP 1990 – Office of Historic Preservation, *Archaeological Resource Management  
Reports (ARMR), Recommended Contents and Format*, Sacramento, CA: Office of  
Historic Preservation, February 1990. Available online at:  
<https://ohp.parks.ca.gov/pages/1069/files/armr-remediated.pdf>

## **Maps**

GLO 1868 – General Land Office, Survey Plat of Township 35 North 1, Range 2 East, Mount Diablo Meridian. Surveyed 1867, Signed by Surveyor General, January 18, 1868, San Francisco, CA.

GLO 1874 – General Land Office, Survey Plat of Township 35 North 1, Range 1 East, Mount Diablo Meridian. Surveyed 1867, 1870, and 1873, Signed by Surveyor General, May 12, 1874, San Francisco, CA.

GLO 1892 – General Land Office, Survey Plat of Township 35 North 1, Range 2 East, Mount Diablo Meridian. Surveyed 1881, 1891, and 1873, Signed by Surveyor General, October 24, 1892, San Francisco, CA.

U.S. Geological Survey  
1956 *Montgomery Creek*, Calif., 1:62,500 Quadrangle Map.

## **Newspapers**

*Free Press*, Redding, California, January 22, 1898, Page 2.

*San Francisco Call*, San Francisco, California, January 20, 1895, Page 5.

## **Websites**

Ancestry.com (1880 U.S Census)

## **GEOLOGIC HAZARDS**

**BACKGROUND** Reference: Title 20 CCR Div. 2 Ch. 5 App. B, Appendix B Information Requirements for an Application

### **DATA REQUESTS**

10. Per Appendix B, (g) (1), (g) (17) (A), (g) (17) (B) please provide the Final Geotechnical and Geohazard Report based on the final locations of project improvements and that satisfies the siting regulation listed.
11. Per Appendix B, (g) (17) (C) please provide a map and description of geologic resources of recreational, commercial, or scientific value which may be affected by the project. Include a discussion of the techniques used to identify and evaluate these resources.
12. Per Appendix B, (i) (1) (A) please provide tables that identify laws, regulations, ordinances, standards, adopted local, regional, state, and federal land use plans, leases, and permits applicable to the proposed project, and a discussion of the applicability of, and conformance with each. The table or matrix shall explicitly reference pages in the application wherein conformance, with each law or standard during both construction and operation of the facility is discussed.
13. Per Appendix B, (i) (1) (B) please provide tables that identify each agency with jurisdiction to issue applicable permits, leases, and approvals or to enforce identified laws, regulations, standards, and adopted local, regional, state, and federal land use plans, and agencies which would have permit approval or enforcement authority, but for the exclusive authority of the commission to certify sites and related facilities.
14. Per Appendix B, (i) (2) please provide the name, title, phone number, address (required), and email address (if known), of an official who was contacted within each agency, and provide the name of the official who will serve as a contact person for Commission staff.
15. Per Appendix B, (i) (3) please provide a schedule indicating when permits outside the authority of the commission will be obtained and the steps the applicant has taken or plans to take to obtain such permits.

## HAZARDS AND HAZARDOUS MATERIALS

### **BACKGROUND: Ice Shed, glyphosate herbicides, shadow flicker, naturally occurring arsenic**

The Direct and Indirect Effects of the Project section (3.11.3.2) discusses potential effects of ice shed from turbine blades, use of glyphosate weed killers (herbicides), and changes in light intensity (shadow flicker). Multiple citations are provided for the information and potential impacts discussed for these issues, however many of the references cited are not readily available for review to verify information provided.

### **DATA REQUEST**

16. Please provide copies of the following references that are not readily available online (for many the online link does not work).

- American Wind Energy Association (AWEA), 2020. Setbacks. Available online at: <https://www.awea.org/policy-and-issues/project-development/state-and-local-permitting/setbacks>. Accessed March 29, 2020.
- Bundesinstitut für Risikobewertung (BfR), 2015. The BfR has finalized its draft report for the reevaluation of glyphosate. BfR Communication No. 008/2015. February 4, 2015.
- Business Enterprise & Regulatory Reform (BERR). 2008. Onshore Wind: Shadow Flicker Available online at: <https://webarchive.nationalarchives.gov.uk/20081013125014/http://www.berr.gov.uk/whatwedo/energy/sources/renewables/planning/ons-hore-wind/shadow-flicker/page18736.html> Archived October 19, 2008; accessed June 19
- Cattin, R., S. Kunz, A. Heimo, G. Russi, M. Russi, and M. Tiefgraber, 2014. Wind Turbine Ice Throw Studies in the Swiss Alps. June 1, 2014. Available online at: [https://www.researchgate.net/publication/228491358\\_Wind\\_turbine\\_ice\\_throw\\_studies\\_in\\_the\\_Swiss\\_Alps](https://www.researchgate.net/publication/228491358_Wind_turbine_ice_throw_studies_in_the_Swiss_Alps).
- Chief Medical Officer of Health (CMOH), 2010. The Potential Health Impact of Wind Turbines. May 2010. Available online at: [http://health.gov.on.ca/en/common/ministry/publications/reports/wind\\_turbine/wind\\_turbine.pdf](http://health.gov.on.ca/en/common/ministry/publications/reports/wind_turbine/wind_turbine.pdf).
- deRoos et al., 2005. Cancer Incidence among Glyphosate-Exposed Pesticide Applicators in the Agricultural Health Study. Published in Environ Health Perspect. 2005 Jan; 113(1): 49–54
- International Agency for research on Cancer (IARC), 2015. IARC Monographs Volume 112: evaluation of five organophosphate insecticides and herbicides. March 20, 2015.

- Morgan, C., E. Bossanyi, and H. Seifert, 1998. Assessment of Safety Risks Arising from Wind Turbine Icing. April 2, 1998. Available online at: <http://citeseerx.ist.psu.edu/viewdoc/download?doi=10.1.1.584.6044&rep=rep1&type=pdf>.
  - Smedley, P. L., and D. Kinniburgh, 2002. A Review of the Source, Behaviour and Distribution of Arsenic in Natural Waters. Applied Geochemistry 17:517–568. Available online at: 10.1016/S0883-2927(02)00018-5.
  - Valavanidis, 2018. Glyphosate, the Most Widely Used Herbicide. Department of chemistry, national and Kapodistrian University of Athens, Greece. Published March 2018.
  - Vaughn, D. J., 2006. Arsenic. Elements 2(2):71–75. Available online at: <https://doi.org/10.2113/gselements.2.2.71>. 2006.
  - Wahl, D., and P. Giguere, 2006. Wind Application Engineering, GE Energy. Ice Shedding and Ice Throw – Risk and Mitigation. April 2006. Available online at: [https://www.ge.com/content/dam/gepower-pgdp/global/en\\_US/documents/technical/ger/ger-4262-ice-shedding-ice-throw-risk-mitigation.pdf](https://www.ge.com/content/dam/gepower-pgdp/global/en_US/documents/technical/ger/ger-4262-ice-shedding-ice-throw-risk-mitigation.pdf).
17. The use of pesticides (herbicides) is noted in several locations in Section 3.11.3, however only use glyphosate weed killers (herbicides) are specifically discussed. Please provide a list of all potential pesticides and herbicides that may be used for the Project.
  18. Provide information on Shasta County requirements for use, storage, and handling of herbicides, including glyphosate herbicides. Are permits required from the County for use of any of the potential herbicides to be used on the site?
  19. Are any other pesticides or herbicides going to be used onsite?

### **BACKGROUND: Potential Hazardous Materials Sites at Project Site**

Section 3.11 notes that data related to current site conditions is based on a Phase I Environmental Site Assessment (Phase I) that was prepared for the Project by Stantec Consulting Services (Stantec) (Appendix F1, Environmental Records Review). However, the document included in Appendix F is not a Phase I Site Assessment.

### **DATA REQUESTS**

20. Provide a copy of the Phase I Environmental Site Assessment (Phase I) prepared for the Project by Stantec Consulting Services.
21. Provide a copy of an updated Phase 1 Environmental Site Assessment since the last one was completed in 2019.



### **BACKGROUND: Blasting (use of explosives)**

DEIR Section 3.11.1.2 discusses the setting and general requirements related to using explosives for blasting in areas of hard rock. The section refers to a description of potential blasting in Section 2.4.5.1, which indicates that a Blasting Plan would be prepared, County and emergency responders would be notified, and that all blasting activities would be conducted in compliance with applicable federal, state, and local laws, and appropriate safety and environmental protection measures would be implemented,

### **DATA REQUESTS**

22. Provide information on what types of permits would need to be obtained for blasting, what agencies they would be obtained from, and a list of the types of safety measures and restrictions would be in place during any blasting activities.
23. Identify whether a licensed professional would be required to prepare the blasting plan and who would be the responsible party onsite to supervise and direct blasting activities.
24. Provide a discussion of the agencies and regulations that govern the use, storage, transportation, and handling of explosives and how they relate to Project activities.
25. Provide a map of the possible locations where blasting could occur.

### **BACKGROUND: Storage of large quantities of fuel onsite**

Fuel would be stored onsite in large quantities in above ground storage tanks (ASTs) during Project construction and Operation for vehicle and equipment refueling.

### **DATA REQUESTS**

26. Provide information on the volumes of fuel and numbers of fuel ASTs to be present onsite during both construction and operational activities.
27. Provide a map (or GIS data) identifying the potential locations of fuel ASTs during both construction and operational activities.
28. Provide information of refueling procedures to reduce the potential for spills or leaks, including locations of refueling activities for vehicles and equipment and spill kits to quickly clean up any minor releases. If any refueling were to occur in construction areas, how would spills or leaks be prevented.
29. Provide a list of procedures to be followed in the event of a large spill from one of the fuel ASTs. Identify who would be responsible for coordinating cleanup and/or remediation of any onsite spills or leaks.

**BACKGROUND: Temporary concrete batch plants**

Up to 3 temporary concrete batch plants would be located onsite. Cement would be discharged to an elevated storage silo. This cement will be used around the site for various project components.

**DATA REQUEST**

30. Provide information on how cement will be transported to the various areas of the site from the batch plants and how and where will this equipment be cleaned to prevent soil or groundwater contamination.

## **SOILS**

**BACKGROUND** Reference: Title 20 CCR Div. 2 Ch. 5 App. B, Appendix B Information Requirements for an Application

### **DATA REQUESTS**

31. Per Appendix B, (g) (15) (A), please provide text and/or a map addressing soil type with respect to agricultural land use. Ensure the map scale is 1:24,000.
32. Per Appendix B, (g) (15) (A) (i), please provide a map depicting soil erodibility. Ensure the map scale is 1:24,000.
33. Per Appendix B, (g) (15) (A) (ii), please provide a map depicting physical and chemical soil characteristics, in addition to Figure 3.9-2 *Corrosion of Concrete and Steel*. Ensure the map scale is 1:24,000.
34. Per Appendix B, (g) (15) (B) and (g) (15) (B) (i), please provide text discussing the impact on soil resources and agricultural land use.
35. Per Appendix B, (i) (1) (A), please provide tables that identify laws, regulations, ordinances, standards, adopted local, regional, state, and federal land use plans, leases, and permits applicable to the proposed project, and a discussion of the applicability of, and conformance with each. The table or matrix shall explicitly reference pages in the application wherein conformance, with each law or standard during both construction and operation of the facility is discussed.
36. Per Appendix B, (i) (3), please provide a schedule indicating when permits outside the authority of the commission will be obtained and the steps the applicant has taken or plans to take to obtain such permits.

## **WATER RESOURCES**

**BACKGROUND** Reference: Title 20 CCR Div. 2 Ch. 5 App. B, Appendix B Information Requirements for an Application

### **DATA REQUESTS**

37. Per Appendix B, (g) (14) (B), please reissue figure 3.12-1 *Surface Waters and Hydrology* with a map scale of 1:24,000.
38. Per Appendix B, (g) (14) (B) (v), please provide a list and map of active groundwater wells within ½ mile of the proposed project, since one alternative for water supply is groundwater extraction. Ensure the map scale is 1:24,000.
39. Per Appendix B, (g) (14) (C) (ii), please provide information on the physical and chemical characteristics of source and discharge water. Data should include both organic and inorganic constituents before and after treatment and should account for seasonal variation for source water. In addition, please provide data documentation.
40. Per Appendix B, (g) (14) (C) (v) and (g) (14) (C) (vi), although the application does include correspondence with the Burney Water District documenting discussion of the ability to provide water, please provide a formal "*letter of intent*" or "*will-serve letter*" from the water purveyor (assumed to be the Burney Water District).
41. Per Appendix B, (g) (14) (C) (viii), although the application does state that there is no wastewater infrastructure that serves the project site, please provide a permit for septic treatment of water discharge as the identified alternative.
42. Per Appendix B, (g) (14) (D) (viii) and (g) (14) (D) (iv), please provide text, diagrams, and calculations regarding storm water control design.
43. Per Appendix B, (g) (14) (E) (ii), since the water supply alternatives include groundwater extraction, please provide an estimation of aquifer drawdown of active groundwater wells within ½ mile of the proposed project based on modeling conducted by a professional geologist. The analysis should include the migration of any contaminants and changes in physical and chemical groundwater conditions.

44. Per Appendix B, (g) (14) (iv), please provide an explanation why a “*zero liquid discharge process*” was not incorporated into the wastewater design for the project.
45. Per Appendix B, (g) (14) (vii), please provide calculations that support a discussion of fresh water supply cumulative impacts.
46. Per Appendix B, (i) (1) (A), please provide tables that identify laws, regulations, ordinances, standards, adopted local, regional, state, and federal land use plans, leases, and permits applicable to the proposed project, and a discussion of the applicability of, and conformance with each. The table or matrix shall explicitly reference pages in the application wherein conformance, with each law or standard during both construction and operation of the facility is discussed.
47. Per Appendix B, (i) (1) (B), please provide tables that identify each agency with jurisdiction to issue applicable permits and approvals, or to enforce identified laws, regulations, standards, and adopted local, regional, state, and federal land use plans.
48. Per Appendix B, (i) (2) please provide the name, title, phone number, address (required), and email address (if known), of an official who was contacted within each agency, and provide the name of the official who will serve as a contact person for Commission staff.
49. Per Appendix B, (i) (3), please provide a schedule indicating when permits outside the authority of the commission will be obtained and the steps the applicant has taken or plans to take to obtain such permits.

### **BACKGROUND: Isolated Wetlands and Waters, California Water Code**

Although Section 3.12.1.3 of the Opt-In application (TN 248288-14) addresses the United States Army Corp of Engineers (USACE) jurisdiction to regulate the discharge of dredged fill material to waters of the United States (U.S.) under Sections 401 and 404 of the Clean Water Act (CWA), the jurisdiction of the California State and Regional Water Boards was not recognized under Sections 13260 and 13376 of the California Water Code (CWC). As stated by the Central Valley Regional Water Quality Control Board (CVRWQCB) in their letter of January 27, 2023, entitled *Comments on AB 205 Opt-In Application for Certification, CEC Docket Number 23-OPT-01, Fountain Wind, LLC, Fountain Wind Project, Shasta County* (Comment Letter), some wetlands and waters are considered geographically isolated from the navigable waters covered under the CWA. If the USACE determines that some wetlands and waters are geographically isolated, regulatory authority would be assigned to the CVRWQCB.

## **DATA REQUEST**

50. Please include text in Section 3.12.1.3 of the Opt-In application describing why the requirements of Sections 13260 and 13376 of the CWC don't apply to the Fountain Wind project.

## **BACKGROUND: Construction and Industrial Wastewater Discharge**

The second (A) row in Section 14 of the Appendix B Opt-In Crosswalk Matrix [TN 248321] states in the Data Response column that construction and industrial discharges are not applicable since "This project will not discharge industrial or construction waste". This seems contrary to the description of the project in the general Opt-In application and contradicts the discussion of the General Construction NPDES permit in Section 3.12.1.3 (TN 248288-14).

## **DATA REQUEST**

51. Please clarify why construction and industrial wastewater discharge do not apply to this project per the statement in the Data Response column of the second (A) row in Section 14 of the Appendix B Opt-In Crosswalk Matrix.

## **BACKGROUND: Construction and Industrial Wastewater Discharge**

Figure 3.12-1 *Surface Water and Hydrology* included Section 3.12.1.2 of the Opt-In application (TN 248288-14) appears to reflect a previous version of the proposed project. As an example, Figure 3.12-1 appears to include (75) wind turbines, while the current proposed project only includes up to (48) per the Fountain Wind Executive Summary and Project Description (TN-248322).

## **DATA REQUEST**

52. Please provide an updated version of Figure 3.12-1 depicting the current proposed locations of wind turbines, roads, and other pertinent features.

## **BACKGROUND: General Industrial NPDES Permit**

Section 3.12.1.3 of the Opt-In application (TN 248288-14) does not address the applicability of the General Industrial NPDES permit administered by the CVRWQCB. Given the discussion of an Operation and Maintenance facility and the (3) concrete batch plants in the current project description (TN 248322), it would seem that the General Industrial NPDES permit might apply.

## **DATA REQUESTS**

53. Please include text in Section 3.12.1.3 of the Opt-In application describing how the requirements of the General Industrial NPDES permit do or do not apply to the Fountain Wind project. This discussion should include all constituents anticipated to be discharged from industrial activities
54. Per the suggestion in the CVRWQCB Comment Letter, please provide a site map of all industrial facilities of the project.

**BACKGROUND: Septic System for Operation and Maintenance Facility**

Section 4.3.4 of the Executive Summary and Project Description (TN-248322) states that the proposed O & M facility will be served by an “on-site septic system” per Shasta County regulation. The Shasta County Onsite Wastewater Treatment Systems (OWTS) program is administered in cooperation with the State Water Resources Control Board (SWCRB) under Waste Discharge Requirements (WDRs) and prohibits some practices such as receiving a projected flow of greater than 10,000 gallons per day.

**DATA REQUEST**

55. Please include text in Section 3.12.1.3 of the Opt-In application or the Executive Summary and Project Description that describes the type of discharges from the O & M facility and how the Shasta County OWTS program can adequately regulate it.

**BACKGROUND: Timberland Conversion Permit**

Although Section 3.12.1.3 of the Opt-In application (TN 248288-14) includes a discussion of the CVRWQCB *General Order of Waste Discharge Requirements for Timberland Management Activities on Non-Federal and Federal Lands (Order No. R5-2017-0061)*, it did not include a discussion of the need for a Timber Conversion Permit administered by California Department of Forestry & Fire Protection (CalFire), which was also identified in the CVRWQCB Comment Letter.

**DATA REQUEST**

56. Please include text in Section 3.12.1.3 that discusses the applicability of the Timberland Conversion Permit.

## WILDFIRE

### **BACKGROUND: Many of the cited wildfire references not readily available**

Multiple citations are provided for the DEIR wildfire setting and effects information and potential impacts related to wildfire as related to the Project. However, many of the references cited are not readily available for review to verify the information provided.

### **DATA REQUESTS**

57. Please provide copies of the following references that are not readily available online (for many the online link does not work).

- Anderson, H. E., 1982. Aids to Determining Fuel Models for Estimating Fire Behavior. Available online at:  
[https://www.fs.fed.us/rm/pubs\\_int/int\\_gtr122.pdf](https://www.fs.fed.us/rm/pubs_int/int_gtr122.pdf).
- California Department of Forestry and Fire Protection (CAL FIRE), 2019a. Communities at Risk List [filtered to include only Shasta County]. Available online at:  
[http://osfm.fire.ca.gov/fireplan/fireplanning\\_communities\\_at\\_risk?filter\\_field=county\\_name&filter\\_text=Shasta](http://osfm.fire.ca.gov/fireplan/fireplanning_communities_at_risk?filter_field=county_name&filter_text=Shasta). Accessed May 23, 2019.
- CAL FIRE and Shasta County Fire, 2018. Shasta-Trinity Unit 2018 Strategic Fire Plan. Available online at:  
<http://cdfdata.fire.ca.gov/pub/fireplan/fpupload/fpppdf1624.pdf>. May 10, 2018.
- California Public Utilities Commission (CPUC), 2020. CPUC Fire Safety Rulemaking Background. Available online:  
<https://www.cpuc.ca.gov/FireThreatMaps/> Accessed July 1, 2020.
- CPUC, 2017a. Decision 17-12-024- Order Instituting Rulemaking to Develop and Adopt Fire Threat Maps and Fire-Safety Regulations. Rulemaking 15-05-006. Issued December 21, 2017.
- Dupras, D., 1997. Geology of Eastern Shasta County. California Geological Survey. Map. Scale 1:100,000.
- Milman, O., 2018. "Wildfire Smoke: Experts Warn of 'Serious Health Effects' Across Western US." The Guardian, August 2, 2018. Available online at:  
<https://www.theguardian.com/world/2018/aug/02/wildfire-events-air-quality-health-issues-in-western-us>. Accessed August 23, 2019.
- National Association of State Foresters, U.S. Bureau of Land Management, U.S. Fish and Wildlife Service, National Park Service, Bureau of Indian Affairs, U.S. Department of Agriculture, and National Wildfire Coordinating Group (National Association of State Foresters et al.), 2003. Interagency Strategy for the Implementation of Federal Wildland Fire Management Policy. June 20, 2003. Available online at:



<https://www.sierraforestlegacy.org/Resources/Community/SmokeManagement/AirQualityPolicy/FedWildFireMgmtPolicy.pdf>.

- National Oceanic and Atmospheric Administration (NOAA), 2018. The Impact of Wildfires on Climate and Air Quality. Available online at: <https://www.esrl.noaa.gov/csd/factsheets/csdWildfiresFIREX.pdf>. Accessed June 24, 2020.
- National Wildfire Coordinating Group, 2015. National Fire Danger Rating System Fuel Model. Available online at: [https://www.nwccg.gov/sites/default/files/stds/standards/nfdrs-fuel-model\\_v1-0.htm](https://www.nwccg.gov/sites/default/files/stds/standards/nfdrs-fuel-model_v1-0.htm). Accessed March 30, 2020.
- Pacific Gas and Electric Company (PG&E), 2018. Company Emergency Response Plan. October 31, 2018.
- PG&E, 2019. Pacific Gas and Electric Company Amended 2019 Wildfire Safety Plan. February 6, 2019. Amended February 14, 2019 and April 25, 2019. Available online: <https://www.cpuc.ca.gov/SB901/>
- PG&E, 2017. Appendix D. Fire Prevention Plan- Electric Annex to the CERP. September 30, 2017.
- Sacramento Bee, 2019. "California's largest wildfire was caused by a hammer, Cal Fire says." June 6, 2019.
- Shasta County, 2016. Shasta County Communities Wildfire Protection Plan 2016. Available online at: <http://www.westernshastarc.org/Docs/ShastaCWPPs-2016.pdf>.
- Shasta County, 2017. Shasta County Development Standards—Chapter 6, Fire Safety Standards. Available online at: <https://www.co.shasta.ca.us/docs/libraries/public-works-docs/devstdmanual/sc-development-standards-manual.pdf>. Revised June 27, 2017.
- Shasta County, 2018. General Plan Element 5.0, Public Safety Group. Available online at: [https://www.co.shasta.ca.us/docs/libraries/resource-management-docs/docs/54firesafety.pdf?sfvrsn=204962bd\\_0](https://www.co.shasta.ca.us/docs/libraries/resource-management-docs/docs/54firesafety.pdf?sfvrsn=204962bd_0). Updated December 11, 2018.
- Shasta County Fire Department, 2018. Email from James Zanotelli to Bill Walker on February 1, 2018.
- Shasta County and City of Anderson, 2017. Shasta County and City of Anderson Multi-Jurisdictional Hazard Mitigation Plan. Available online at: [https://www.co.shasta.ca.us/docs/libraries/public-works-docs/hmp-documents/shasta-county-hazard-mitigation-plan-november-2017.pdf?sfvrsn=b54ee689\\_2](https://www.co.shasta.ca.us/docs/libraries/public-works-docs/hmp-documents/shasta-county-hazard-mitigation-plan-november-2017.pdf?sfvrsn=b54ee689_2). November 16, 2017.
- Stantec and Pacific Wind Development, LLC, 2018. Environmental Initial Study, Fountain Wind Project Pacific Wind Development, LLC. Prepared in coordination with and for Shasta County Department of Resource Management

Planning Division. June 28, 2019. Available online at:

<https://www.co.shasta.ca.us/docs/libraries/resource-management-docs/projects/fountain-wind-project/initial-study/initial-study.pdf>.

- U.S. Forest Service (USFS), 2015. The 2010 Wildland-Urban Interface of the Conterminous United States. June 2015. Available online: [https://www.fs.fed.us/nrs/pubs/rmap/rmap\\_nrs8.pdf](https://www.fs.fed.us/nrs/pubs/rmap/rmap_nrs8.pdf) Accessed June 17, 2020.
- U.S. Forest Service, U.S. Bureau of Land Management, Bureau of Indian Affairs, U.S. Fish and Wildlife Service, and National Park Service (USFS et al.), 2009. Guidance for Implementation of Federal Wildland Fire Management Policy. February 13, 2009. Available online at: [https://www.nifc.gov/policies/policies\\_documents/GIFWFMP.pdf](https://www.nifc.gov/policies/policies_documents/GIFWFMP.pdf).
- WRCC, 2020b. Burney, California Total of Precipitation (Inches), Period of Record 1948 to 2015. Available online at: <https://wrcc.dri.edu/WRCCWrappers.py?sodxtrmts+041214+por+por+pcpn+none+msum+5+01+F>. Accessed June 24, 2020.

### **BACKGROUND: Fire Protection Plan during Project construction**

DEIR Section 3.16.3.1 b) indicates “the Project is not intended for and would not be used for human occupation; therefore, no occupants would be exposed to increased risks associated with wildfire”, however there will be up to 400 workers onsite during construction and up to 12 full-time employees onsite during operation.

### **DATA REQUEST**

58. Provide a discussion on the potential for Project construction and operation to increase risks associated with wildfires to workers, including impacts of loss, injury or death from a wildfire or adverse effects due to inhalation of wildfire pollutants.

### **BACKGROUND: Interference in aerial firefighting activities**

DEIR Section 3.16.3.1 a) includes discussion of potential hazards due to the wind turbine towers interfering with firefighting operations in the event of a local wildfire and a mitigation measure (MM 3.16-1b) to reduce the risk. This measure has no way of verifying completion nor does it require any coordination with CALFIRE staff regarding this information.

### **DATA REQUEST**

59. Provide a discussion on timing and verification of transmittal of data regarding tower locations to CALFIRE, and a discussion of whether any coordination would

occur before or during fires with CALFIRE regarding aerial firefighting in the vicinity of the turbines.

**BACKGROUND: Regulatory setting discussion of LORS as related to Project**  
DEIR Section 3.16.1.3 (Regulatory Setting) lists and lists and summarizes federal, State, and local laws, ordinances, regulations, and standards (LORS) related to wildfire in the Project area. The summarized LORS do not discuss how each applies to the Project.

#### **DATA REQUEST**

60. Provide a discussion of how each of the LORS summarized in Section 3.16.1.3 applies specifically to the project.

**BACKGROUND: Exacerbation of wildfire risks and blasting (use of explosives)**  
DEIR Section 2.4.5 (Site Preparation and Construction) and the Application for Opt-in Certification Executive Summary and Project Description Section 4.4.1.3 both mention that emergency responders would be notified 24 hours in advance of blasting, that all blasting activities would be conducted in compliance with applicable federal, state, and local laws, and appropriate safety and environmental protection measures would be implemented, including weather restrictions in regards to wildfire risk. A minimal discussion of blasting as a potential fire source is in Section 3.16.3.1 b), but no procedures regarding blasting or blasting fire safety measures are included in the mitigation measure related to Fire Safety (3.16-2a).

#### **DATA REQUEST**

61. Provide a discussion or listing of procedures to be added to MM 3.16-2a specifically designed to reduce the potential for ignition of wildfire by blasting activities.

#### **BACKGROUND: Wildfire ignited by nacelle or turbine fire**

Mitigation measure 3.16-2b in DEIR Section 3.16.3.1 b) indicates that the turbines shall be equipped with fire detection and prevention technology compatible with the manufacturer's operating requirements and technology for fire detection and suppression within turbines. The mitigation measure also includes specific design requirements as related to fire, including fire detection and warning systems, and automatic fire extinguishing systems in the nacelle of each wind turbine, and shut down of the turbine if an out-of-range condition is reported.

#### **DATA REQUEST**

62. Provide a description of the automatic fire extinguishing systems for the nacelle.

63. Provide information on timing of and of inspection activities that would occur in the event of an out-of-range notification and shut down of a turbine.
64. Provide a discussion of activities required to restart a turbine after a shutdown to ensure there is no future chance of fire or sparks.
65. Provide procedures that would occur in the event of a turbine/nacelle fire. What procedures would occur in the event the automatic fire suppression does not fully extinguish a fire?

**BACKGROUND: Vegetation clearance for overhead collector lines**

DEIR Section 3.16.3.1 c) indicates an approximately 80-foot-wide corridor along the overhead collector lines would be maintained free of taller woody vegetation during operation.

**DATA REQUEST**

66. Clarify whether this would include any of the understory vegetation, and if not how would this affect the potential for wildfire.

Attachment C

Correspondence from MOU agencies



---

## Central Valley Regional Water Quality Control Board

27 January 2023

Leonidas Payne  
California Energy Commission (CEC)  
1516 Ninth Street  
Sacramento, CA 95814-5512

### **COMMENTS ON AB 205 OPT-IN APPLICATION FOR CERTIFICATION, CEC DOCKET NUMBER 23-OPT-01, FOUNTAIN WIND, LLC, FOUNTAIN WIND PROJECT, SHASTA COUNTY**

As per the provisions of the Public Resources Code section 25545.5 Coordination Plan developed between the California Energy Commission and the California State Water Resources Control Board and California Regional Water Quality Control Boards, the Central Valley Regional Water Quality Control Board (Central Valley Water Board) has reviewed Fountain Wind, LLC's application (Application) for certification of the Fountain Wind Project proposed in Shasta County.

The Fountain Wind Project proposes to construct a wind energy generation facility consisting of up to 48 turbines, each with a generating capacity of up to 7.2 megawatts, with a total nameplate generating capacity of up to 205 megawatts. Associated infrastructure and facilities would include a 34.5-kilovolt overhead and underground electrical collector system to connect turbines together and to an on-site collector substation; overhead and underground fiber-optic communication lines; an on-site switching station to connect the project to the existing regional grid operated by Pacific Gas and Electric Company; a temporary construction and equipment laydown area; nine temporary laydown areas distributed throughout the project site to temporarily store and stage materials and equipment; an operation and maintenance facility with employee parking; up to four permanent meteorological evaluation towers (METs); temporary, episodic deployment of mobile Sonic Detection and Ranging (SoDAR) or Light Detection and Ranging (LiDAR) systems within identified disturbance areas (e.g., at MET locations); two storage sheds; and three temporary concrete batch plants. Up to 19 miles of new access roads would be constructed within the project site, and up to 19 miles of existing roads would be improved. No new transmission lines are proposed.

The proposed project site is located on approximately 4,500 acres of private, leased land in unincorporated Shasta County. The property is located approximately 6 miles west of Burney, one mile west of the existing Hatchet Ridge Wind Project, immediately

---

MARK BRADFORD, CHAIR | PATRICK PULUPA, ESQ., EXECUTIVE OFFICER

south of California State Route 299, and near the private recreational facility of Moose Camp and other private inholdings.

Based on the Application and the project description, the following permits may be required from the Central Valley Water Board:

- Clean Water Act (CWA) Section 401, Water Quality Certification;
- Waste Discharge Requirements for the Discharge of Dredged or Fill Material to Waters of the State;
- Coverage under National Pollutant Discharge Elimination System (NPDES) General Permit for Stormwater Discharges Associated with Construction and Land Disturbance Activities (Order WQ 2022-0057-DWQ);
- Coverage under NPDES General Permit for Stormwater Discharges Associated with Industrial Activities (Order 2014-0057-DWQ);
- Report of Waste Discharge (ROWD) (Form 200) for wastewater treatment and/or disposal;
- Coverage under General Order of Waste Discharge Requirements for Timberland Management Activities on Non-Federal and Federal Lands (Order No. R5-2017-0061).

As per Public Resources Code section 25545.5, subdivision (d)(2), the Central Valley Water Board is required to take final action on the opt-in facility within 90 days after the certification of the final environmental impact report (EIR) by the California Energy Commission, provided that Fountain Wind, LLC has filed a complete application with the Central Valley Water Board prior to certification of the Final EIR. Additionally, the applicable permit(s) must be obtained prior to commencement of construction activities.

#### Clean Water Act (CWA) Section 401, Water Quality Certification

The Central Valley Water Board has regulatory authority over wetlands and waterways under the Federal Clean Water Act (CWA) and the California Water Code, Division 7 (CWC). Discharge of dredged or fill material to waters of the United States requires a CWA Section 401 Water Quality Certification from the Central Valley Water Board. Section 401 Certifications are issued in combination with CWA Section 404 Permits issued by the Army Corps of Engineers. Project activities that may require a section 401 Water Quality Certification include any modifications to these waters, such as the replacement or installation of culverts and/or low water stream crossings, stream bank modifications, filling of wetlands, etc. Steps must be taken to first avoid and minimize impacts to these waters, and then mitigate for unavoidable impacts.

Although both a *Fountain Wind Energy Project Aquatic Resources Survey Report* (Stantec, 2019) that summarized potentially jurisdictional aquatic resources within the survey area and an *LSAA [Lake or Streambed Alteration Agreement] Summary of Aquatic Impacts* were provided in the Application, verification of the aquatic resource delineation by U.S. Army Corps of Engineers will be required to determine waters of the United States versus non-federally jurisdictional waters impacted by the project.

Both the Section 404 Permit and Section 401 Water Quality Certification must be obtained prior to site disturbance. Any person discharging dredge or fill materials to waters of the State must file a report of waste discharge pursuant to Sections 13376 and 13260 of the California Water Code. Both the requirements to submit a report of waste discharge and apply for a Water Quality Certification may be met using the same application form, found at [Water Boards 401 Water Quality Certification and/or WDRs Application](https://www.waterboards.ca.gov/water_issues/programs/cwa401/#resources) ([https://www.waterboards.ca.gov/water\\_issues/programs/cwa401/#resources](https://www.waterboards.ca.gov/water_issues/programs/cwa401/#resources)).

This link includes the application materials and guidance documents regarding what information is needed for a complete application.

**Fountain Wind Project Application Data Deficiencies (Application Appendix B, Crosswalk Matrix, section 14, Water Resources):**

- Section 401 application (draft application is sufficient at this time);
- An aquatic resource delineation report verified by U.S. Army Corps of Engineers, if verification is required by the Corps;
- A description of the waters proposed to be impacted by the project including the quantity of impacts to waters proposed to receive a discharge of dredged or fill material at each location rounded to at least the nearest one-hundredth (0.01) of an acre and nearest linear foot, and cubic yards of fill.
- A compensatory mitigation plan for permanent physical loss and permanent ecological degradation of a water of the state. The plan shall comport with State Water Resources Control Board's Supplemental Dredge or Fill Guidelines, Subpart J. A link is provided: [State Wetland Definition and Procedures for Discharges of Dredged or Fill Material to Waters of the State \(ca.gov\)](https://www.waterboards.ca.gov/water_issues/programs/cwa401/docs/2021/procedures.pdf) ([https://www.waterboards.ca.gov/water\\_issues/programs/cwa401/docs/2021/procedures.pdf](https://www.waterboards.ca.gov/water_issues/programs/cwa401/docs/2021/procedures.pdf))

**Isolated wetlands and other waters not covered by the Federal Clean Water Act**

Some wetlands and other waters are considered "geographically isolated" from navigable waters and are not within the jurisdiction of the Clean Water Act. (e.g., isolated wetlands, vernal pools, or stream banks above the ordinary high-water mark). Discharge of dredged or fill material to these waters may require either individual or general waste discharge requirements from the Central Valley Water Board. If the U.S. Army Corps of Engineers determines that isolated wetlands or other waters exist at the project site, and the project impacts or has potential to impact these non-jurisdictional waters, a Report of Waste Discharge and filing fee must be submitted to the Central Valley Water Board. The Central Valley Water Board will consider the information provided and either issue or waive Waste Discharge Requirements. Failure to obtain waste discharge requirements or a waiver may result in enforcement action.

Any person discharging dredge or fill materials to waters of the State must file a report of waste discharge pursuant to Sections 13376 and 13260 of the CWC. Both the requirements to submit a report of waste discharge and apply for a Water Quality



Certification may be met using the same application form, found at [Water Boards 401 Water Quality Certification and/or WDRs Application](https://www.waterboards.ca.gov/water_issues/programs/cwa401/#resources) ([https://www.waterboards.ca.gov/water\\_issues/programs/cwa401/#resources](https://www.waterboards.ca.gov/water_issues/programs/cwa401/#resources)). This link includes the application materials and guidance documents regarding what information is needed for a complete application.

**Fountain Wind Project Application Data Deficiencies (Application Appendix B, Crosswalk Matrix, section 14, Water Resources):**

- Waste Discharge Requirements application (draft application is sufficient at this time);
- An aquatic resource delineation indicating aquatic resources that are not federally jurisdictional;
- A description of the waters proposed to be impacted by the project including the quantity of impacts to waters proposed to receive a discharge of dredged or fill material at each location rounded to at least the nearest one-hundredth (0.01) of an acre and nearest linear foot, and cubic yards of fill.
- A compensatory mitigation plan for permanent physical loss and permanent ecological degradation of a water of the state. The plan shall comport with State Water Resources Control Board's Supplemental Dredge or Fill Guidelines, Subpart J. A link is provided: [State Wetland Definition and Procedures for Discharges of Dredged or Fill Material to Waters of the State \(ca.gov\)](https://www.waterboards.ca.gov/water_issues/programs/cwa401/docs/2021/procedures.pdf) ([https://www.waterboards.ca.gov/water\\_issues/programs/cwa401/docs/2021/procedures.pdf](https://www.waterboards.ca.gov/water_issues/programs/cwa401/docs/2021/procedures.pdf))

**NPDES General Permit for Stormwater Discharges Associated with Construction and Land Disturbance Activities (CGP)**

Construction activity resulting in a land disturbance of one acre or more must obtain coverage under the CGP, including, but not limited to, clearing, grading, grubbing, or excavation. Project activities that may require coverage under the CGP include the construction of new access roads, widening of existing access roads, and clearing and/or grading activities for staging/laydown areas, equipment storage/maintenance areas, and work areas around each turbine. The project must be conditioned to implement stormwater pollution controls during construction and post-construction as required by the CGP. To apply for coverage under the CGP, the Legally Responsible Person (LRP) for the project must submit Permit Registration Documents electronically prior to construction. Detailed information on the CGP can be found on the State Water Board website [Construction Stormwater General Permit Order WQ 2022-0057-DWQ \(ca.gov\)](https://www.waterboards.ca.gov/water_issues/programs/stormwater/construction/general_permit_reissuance.html) ([https://www.waterboards.ca.gov/water\\_issues/programs/stormwater/construction/general\\_permit\\_reissuance.html](https://www.waterboards.ca.gov/water_issues/programs/stormwater/construction/general_permit_reissuance.html)).

This link includes the application materials and guidance documents regarding what information is needed for a complete application.

The “Water Resources” section of the Appendix B Crosswalk Matrix that was submitted as part of the Application incorrectly states that a construction permit is not applicable.

**Fountain Wind Project Application Data Deficiencies (Application Appendix B, Crosswalk Matrix, section 14, Water Resources):**

- Notice of Intent to request coverage under the CGP, including a Risk Level Determination, submitted through the State Water Board Stormwater Multiple Application and Report Tracking System (SMARTS);
- Site Drawings and maps of areas requiring CGP coverage;
- Construction Stormwater Pollution Prevention Plan (SWPPP) developed by a Qualified SWPPP Developer (QSD).

NPDES General Permit for Stormwater Discharges Associated with Industrial Activities

On 16 November 1990, the USEPA promulgated regulations to implement the Clean Water Act’s mandate to control pollutants in storm water discharges (40 C.F.R. section 122, et seq.) which require specific categories of industrial facilities discharging stormwater to obtain NPDES permits and to implement Best Available Technology Economically Achievable (BAT) and Best Conventional Pollutant Control Technology (BCT) to reduce or eliminate industrial stormwater pollution. These requirements apply to industries with Standard Industrial Classification (SIC) 3273 – Ready-Mixed Concrete and SIC Codes 40XX through 45XX (except 4221-25) pertaining to facilities involved in vehicle maintenance (including mechanical repairs, fueling, and lubrication). Industrial operations with an applicable SIC code must be covered under the *NPDES General Permit for Stormwater Discharges Associated with Industrial Activities* (IGP). Detailed information on the IGP can be found on the State Water Board website [Water Boards Storm Water Multiple Application and Report Tracking System](https://smarts.waterboards.ca.gov/smarts/faces/SwSmartsLogin.xhtml) (<https://smarts.waterboards.ca.gov/smarts/faces/SwSmartsLogin.xhtml>). This link includes the application materials and guidance documents regarding what information is needed for a complete application.

The proposed project involves industrial activities requiring IGP coverage, including up to three temporary concrete batch plants, an operation and maintenance facility, and a temporary construction staging area with fuel storage tanks. Refueling and general maintenance for construction equipment, such as changing fluids and lubricating parts, would occur within this temporary construction and equipment area or other outdoor locations with sufficient containment capabilities.

The “Water Resources” section of the Appendix B Crosswalk Matrix that was submitted as part of the Application incorrectly states that an industrial permit is not applicable.

**Fountain Wind Project Application Data Deficiencies (Application Appendix B, Crosswalk Matrix, section 14, Water Resources):**

- Notice of Intent to request coverage under the IGP submitted through the State Water Board Stormwater Multiple Application and Report Tracking System (SMARTS);
- Site Map of each industrial facility requiring IGP, to include the information identified in section X.E of the IGP;
- Industrial Stormwater Pollution Prevention Plan (SWPPP).

Wastewater Treatment and/or Disposal

The proposed project also includes up to three temporary concrete batch plants onsite. There is no information provided on how wastewater from the batch plant(s) will be processed.

The California Water Code requires that any person proposing to discharge waste that could affect the quality of waters of the State to file a Report of Waste Discharge (ROWD). Due to the potential threats to water quality that activities at the proposed facility pose, a ROWD will likely be required so Central Valley Water Board staff can determine if operations associated with the proposed project would need to be regulated by one or more Water Board programs.

Information regarding submittal of a ROWD and additional information can be found on our website at [Central Valley Water Board Permit Information](https://www.waterboards.ca.gov/publications_forms/forms/docs/form200.pdf) ([https://www.waterboards.ca.gov/publications\\_forms/forms/docs/form200.pdf](https://www.waterboards.ca.gov/publications_forms/forms/docs/form200.pdf)).

This link includes the application materials and guidance documents regarding what information is needed for a complete application. Furthermore, a document titled "Information Needs for Domestic and Industrial Wastewater Disposal to Land" is attached to this letter.

**Fountain Wind Project Application Data Deficiencies (Application Appendix B, Crosswalk Matrix, section 14, Water Resources):**

- Form 200, Report of Waste Discharge (ROWD), for the discharge of wastewater, if applicable.

General Order of Waste Discharge Requirements for Timberland Management Activities on Non-Federal and Federal Lands (Order No. R5-2017-0061)

The Fountain Wind Project proposes to convert private timberland acreage to a non-timber use. This conversion will require a Timberland Conversion Permit through the California Department of Forestry & Fire Protection (CalFire). Additionally, pursuant to the California Water Code, any person that discharges waste or threatens to discharge waste from timber harvesting activities that could affect the quality of the waters of the state must apply for coverage under the *General Order of Waste Discharge Requirements for Timberland Management on Non-Federal and Federal Lands (Order No. R5-2017-0061)* prior to the start of timber operations, or file for Waste Discharge

Requirements at least 90 days prior to the start of operations. Failure to do so can result in civil liabilities of up to \$5000 for each day the violation occurs (see California Water Code Section 13261). Forms and associated documents for General Order enrollment are available at [Water Boards Central Valley Forest Activities Water Issues](https://www.waterboards.ca.gov/centralvalley/water_issues/forest_activities/) ([https://www.waterboards.ca.gov/centralvalley/water\\_issues/forest\\_activities/](https://www.waterboards.ca.gov/centralvalley/water_issues/forest_activities/)).

**Fountain Wind Project Application Data Deficiencies (Application Appendix B, Crosswalk Matrix, section 14, Water Resources):**

- Notice of Intent to request coverage under the *General Order of Waste Discharge Requirements for Timberland Management on Non-Federal and Federal Lands*. Note that a Timberland Conversion Permit from CalFire is required to be obtained prior to applying for coverage.

If you have any questions or comments regarding this matter, please contact me at (530) 224-4784 or by email at [Lynn.Coster@waterboards.ca.gov](mailto:Lynn.Coster@waterboards.ca.gov).

Lynn Coster  
Senior Environmental Scientist  
Storm Water & Water Quality Certification Unit

LC: db

Enclosure: Document: Information Needs for Domestic and Industrial Wastewater Disposal to Land

cc via email: Henry Woltag, Fountain Wind, LLC, 1001 McKinney, Suite 700, Houston, TX  
Caitlin Barns, Stantec, 601 SW 2<sup>nd</sup> Avenue, Suite 1400, Portland, OR

# **ATTACHMENT A**

## **INFORMATION NEEDS FOR DOMESTIC AND INDUSTRIAL WASTEWATER DISPOSAL TO LAND**

A complete report of waste discharge consists of a State Water Resources Control Board Form 200, a technical report, and the first annual fee. The technical report must completely characterize the discharge (i.e., volume, location, and nature of the discharge) and describe treatment processes and discharge conditions. The technical report must be certified by a California Registered Civil Engineer. To accommodate our filing system, the technical report should be single-sided, indexed, unbound, and provide at least a 1-inch top margin. The Information Needs given below comprise the minimum information needed for adoption of waste discharge requirements or issuance of a waiver of waste discharge requirements for disposal of domestic and industrial wastewater.

### **1. Description of Discharge**

- a. Volume (i.e., design flow) - An estimate of the average, maximum and any variation in flows, as well as the design flows (hydraulic and treatment) for the treatment system. All necessary sizing calculations to accommodate the treatment volume must be included.
- b. Nature (physical and chemical characteristics) - Provide the known or expected strength of wastewater entering and leaving treatment units. State whether any high strength or chemically treated waste could be discharged to the system. A summary of the Priority Pollutant testing should be included and chemicals which have a reasonable potential to cause or contribute to an in-stream excursion above a narrative or numerical water quality standard should be discussed.
- c. Sludge disposal practices – A summary of the existing and proposed sludge disposal activities should be included with the application. This would include how sludges, collected screenings, and other solids removed from liquid wastes are stored and disposed. If analytical data is available, this should be provided with the submittal package.
- d. Water quality characteristics of all wastewaters. This characteristic should include a list of chemicals utilized in plant processes that could be discharged through the outfall, and include a process water flow diagram. Supply water quality analytical data should be included into the submittal. This characteristic should include a summary of any chronic/acute toxicity analysis.
- e. Location - The physical (street) address must be provided as well as the location based on the public lands survey system (i.e., township, range, section, baseline, and meridian). Give distance and direction to the nearest city or town and the county of discharge. Discuss how site characteristics such as soil profile, groundwater, surface water, topography, climate, etc., are compatible with the discharge and the method of disposal.

- 
- f. Management of stormwater – A description/map of how the stormwater is managed/discharged at the facility. This description should include an analysis of how Best Management Practices will be utilized to control stormwater.

## **2. Treatment System**

- a. Treatment method - State what method of treatment will be provided (e.g., oxidation pond, spray irrigation, etc.). Be complete in the description.
- b. Treatment capacity - Give the rated design capacity of the system. Provide a treatment schematic.
- c. Documentation - Furnish design plans and specifications or, if they are not yet available, a detailed written description accompanied by visual aids such as layouts and process schematics.
- d. A description of the proposed performance monitoring system utilized to determine that the disposal system is in compliance with WDRs.
- e. A spill plan including the preventive and contingency measures for controlling accidental discharges and for minimizing the effect of such an event.
- f. Information required assessing protection of the facility from floods and frost.

## **3. Disposal system**

- a. Disposal method - Describe the method of wastewater disposal, whether to an unlined pond, a lined pond, surface water disposal, overland flow system, spray field, standard gravity leach field, pressurized leach field, or leach field with emitters (these are just examples).
- b. Reclamation - State whether treated wastewater will be reclaimed. Reclaimed wastewater must be treated, disinfected, and handled in accordance with California Code of Regulations, Title 22, Section 60301, et al., which contains requirements for system design, safety, redundancy, etc.
- c. Disposal capacity - Provide the capacity, footprint, and layout of the disposal system, including design calculations, and any supporting documentation. For a pond, include a water balance with design parameters and assumptions clearly stated.
- d. Documentation - Furnish design plans and specifications or, if they are not yet available, a detailed written description accompanied by visual aids such as layouts and process schematics.
- e. Operation and maintenance - Discuss the required operation and maintenance and the person or entity who will be performing it. Include a statement of qualifications and experience.

- 
- f. A narrative and schematic description of each of the proposed alternatives in the disposal system. Identification of whether disposal occurs on a seasonal basis. Information on the type and size of the disposal alternative(s). Provide design details, including flows, for each disposal alternative.
  - g. A discussion on the potential hydraulic and other impacts of the selected wastewater disposal alternatives.
  - h. If treated water is to be used for irrigation, property owner, type and permeability of the soils, estimated quantities based on consumptive use, method of application, surface runoff controls and the irrigation season must be identified. Institutional arrangements for control of land must also be identified.
  - i. If ponds are used for the disposal of the treated wastewater, information on the freeboard and structural integrity and estimates of infiltration and evaporation must be provided.
  - j. Discussion of Best Management Practices (BMPs) that will be employed at the facility to prevent unauthorized wastewater discharges.

#### **4. Soil, Groundwater, and Surface Water**

- a. Soil
  - i) Soil depth - Indicate the depth of unsaturated soil when groundwater is closest to the surface.
  - ii) Soil description - Describe soil types based on site-specific information (e.g., borings, test pits). Sampling locations must be accurately measured and recorded. Provide a description and results of percolation tests or other tests used to estimate the soils' long-term infiltration rates. Include depth, thickness, and extent of various soil horizons on a written or visual log, or both. Soils must be described a minimum of five feet below the bottom of any disposal unit (e.g., leaching trench).
  - iii) Bedrock - Characterize bedrock encountered in the disposal area. State type (e.g., greenstone, shale) and condition (e.g., weathered, fractured).
  - iv) Map - Depict soil/rock types and test locations accurately on a scale drawing. The accuracy of the map must be certified by a California Registered Civil Engineer or Land Surveyor.
- b. Groundwater - Give depth to highest anticipated groundwater based on onsite measurements taken over a wet season. Information may be augmented by groundwater level data from nearby wells, if such data represent first encountered groundwater at the site. Provide direction of groundwater movement, if known, and groundwater quality (e.g., mineral, nutrient, biological), if known. Submit information on any existing groundwater monitoring well locations and completion details. Submit locations of any known geologic features (e.g. aquitards, subterranean channels, faults,

etc.) and Aquifer characteristics (e.g., hydraulic conductivity, porosity, etc.) determined from a sufficient number of locations by aquifer tests, soil borings, geophysics, etc. A summary of historical analytical results should be included.

c. Surface Water

- i) Drainage to - Give the names of surface waters to which the site drains.
- ii) Other surface waters - Describe springs, seeps, wetlands, ponds, lakes, canals, and ditches within 500 feet of the disposal area.
- iii) Map - On a topographic quadrangle map, or equivalent, depict the site and surrounding surface water features.

**5. Other**

a. Maps

- i) Vicinity map - Provide a scale map showing the location of the facility relation to known features, such as cities, towns, rivers, and roads.
- ii) Site map - Provide an accurate scale site map, prepared under the direction of and certified by a California Registered Civil Engineer or Land Surveyor. The site map must, at a minimum, show collection, treatment, and disposal facilities, onsite well locations (monitoring wells, supply wells), buildings, and property boundaries. Features must be appropriately named and labeled.
- iii) Water well locations map - All water supply wells, including but not limited to individual domestic wells, community wells, and agricultural wells, within 500 feet of the disposal area must be shown. The map or an accompanying table must include well information such as ownership, construction details, and purpose of use (e.g., domestic, industrial, agricultural).
- iv) Identification of the surface drainage controls, drainage courses and surface water bodies, including rivers, streams, lakes and ponds within one mile of the facility.
- v) Locations of all recharge areas (e.g. ephemeral stream channels, percolation ponds, subsurface sewage disposal systems, irrigated agriculture, etc.) within one mile of the facility.
- vi) Identification of all piezometers and all wells, including monitoring, extraction, injection and supply wells, onsite and offsite within one mile of the site or within an area that may potentially be influenced by the discharge.
- vii) Property boundaries.
- viii) Buildings, dwellings, and other significant structures.



- 
- ix) Map(s) of the site that depicts the location of all surface features identified above, including the process and source areas, the points of discharge and the disposal facilities.
  - x) Site plan with any proposed water management modifications.
- b. Climate information
- i) Precipitation - Indicate the average annual precipitation and wet year precipitation (25 and 100-year return periods) and, if a water balance is required, monthly distributions. Station location(s) and source of information must be cited.
  - ii) Evaporation/evapotranspiration - Give annual evaporation and, if a water balance is required, monthly distribution. Evapotranspiration data is needed only if disposal is by application to land with plant uptake (e.g., overland flow, spray field, irrigation). Station location(s) and source of information must be cited.
  - iii) Flood hazard - Provide a copy of the Flood Insurance Rate Map for the facility area. A photocopy of the portion pertaining to the site (and the map number) is acceptable. Submit a statement certifying that the treatment and disposal areas are outside of the 100-year flood zone.
- c. California Environmental Quality Act - Provide a copy of the final (adopted) CEQA document, adoption date, and adopting authority. If a final CEQA document is not yet available, give a time schedule for completion of CEQA.
- d. Local permits - Provide copies of the facility's conditional use permit (if one is required) and the permit for construction of the wastewater treatment and disposal facility.
- e. Land use - Provide a map showing the current use of the property and surrounding properties.
- f. System sustainability - Indicate the proposed operator and responsible entity. Describe the kinds of financial assurance mechanisms that will be provided to ensure funding should the system or its source of financial support fail.

## **6. Best Practical Treatment and Control (BPTC)**

The revised application should discuss if the wastewater treatment plant provides the best practicable treatment and control (BPTC) of the discharge (industrial and domestic), which is required by State Water Resources Control Board Resolution No. 68-16 (Antidegradation Policy).

## **7. Antidegradation Analysis**

An antidegradation analysis is required that would require an examination of:

- a) Existing applicable water quality protection standards;
- b) Ambient conditions in receiving waters (groundwaters) compared to standards;

- 
- c) Incremental changes in chemical constituent loading;
  - d) Treatability characteristics;
  - e) Best practicable treatment and control (BPTC);
  - f) Comparison of the proposed increased loadings relative to other sources; and,
  - g) An assessment of the significance of changes in ambient ground water quality.

The antidegradation analysis must also analyze whether:

- a) Such degradation is consistent with the maximum benefit to the people of the state;
- b) The activity is necessary to accommodate important economic or social development in the area;
- c) The highest statutory and regulatory requirements and best management practices for pollution control are achieved; and
- d) Resulting groundwater quality is adequate to protect and maintain existing beneficial uses.

## **8. Salinity**

The discharger may be required to prepare a salinity evaluation and minimization plan to address sources of salinity from the Facility. Provide available data and estimate salinity concentrations in the discharge, influent, and domestic/industrial water supply.

## **9. Regionalization, Reclamation, Recycling and Conservation**

As part of the report of waste discharge application, the discharger shall provide the following:

- a) Efforts that have been taken to promote new or expanded wastewater recycling and reclamation opportunities and programs;
- b) Water conservation measures; and
- c) Regional wastewater management opportunities and solutions (e.g. regionalization).

The report should include all current efforts and actions involving regionalization, reclamation, recycling and conservation. The status of current opportunities and activities, the potential for new opportunities and activities, and impediments to new or expanded efforts should be addressed. If applicable, the ROWD must also include an evaluation of wastewater reclamation and land disposal as alternative disposal methods.

## **10. Title 27 Exemption**

The discharger shall provide evidence regarding exemption from Section 20090, Title 27, California Code of Regulations. The ROWD must explain what exemption applies, and justify why it is applicable.



**Yana Garcia**  
Secretary for  
Environmental Protection



## Department of Toxic Substances Control

Meredith Williams, Ph.D.  
Director  
8800 Cal Center Drive  
Sacramento, California 95826-3200



**Gavin Newsom**  
Governor

### Sent via Electronic Mail

January 30, 2023

Leonidas Payne, Project Manager  
California Energy Commission  
Environmental Office, 715 P Street, MS-15  
Sacramento, CA 95814  
[Leonidas.Payne@energy.ca.gov](mailto:Leonidas.Payne@energy.ca.gov)

Subject: Fountain Wind Project, Shasta County Data Adequacy Review Request

Dear Mr. Payne,

Thank you for the opportunity to review and comment on the proposed Fountain Wind Project in Shasta County (State Clearinghouse Number 2019012029). The Fountain Wind Project is a wind energy generation facility proposed by Fountain Wind LLC (Applicant) on approximately 4,500 acres of private, leased land in unincorporated Shasta County, California. The property is located approximately 1 mile west of the existing Hatchet Ridge Wind Project, 6 miles west of Burney, 35 miles northeast of Redding, immediately south of California State Route 299 (SR 299), and near the private recreational facility of Moose Camp2 and other private inholdings. Overall, the project would have a total generating capacity of up to 205 megawatts. The Applicant proposes to construct up to 48 turbines, each with a generating capacity of up to 7.2 megawatts. Associated infrastructure and facilities would include a 34.5-kilovolt overhead and underground electrical collector system to connect turbines together and to an on-site collector substation; overhead and underground fiber-optic communication lines; an on-site switching station to connect the project to the existing regional grid operated by the Pacific Gas and Electric Company; a temporary construction and equipment laydown area; nine temporary laydown areas distributed throughout the project site to temporarily store and stage materials and equipment; an operation and maintenance facility with employee parking; up to four permanent meteorological evaluation towers (METs); temporary, episodic deployment of mobile Sonic Detection and Ranging (SoDAR) or Light Detection and Ranging (LiDAR) systems within identified disturbance areas (e.g., at MET locations); two storage sheds; and three temporary batch plants. Up to 19 miles of new access roads would be constructed within the project site, and up to 19 miles of existing roads would be improved. No new transmission lines are proposed. It appears that the proposed project was rejected by

January 30, 2023

Mr. Payne

the Shasta County Planning Commission in 2021 due to high public controversy and wildfire risk.

The Department of Toxic Substances Control (DTSC) has reviewed the proposed project and has identified that the project documents contain all the information required for an assessment of the waste generation and storage standards, site remediation, and waste reduction requirements. DTSC has determined that the application contains adequate data and supports the California Energy Commission's completeness determination.

Thank you for your assistance in protecting California's people and environment from the harmful effects of toxic substances. If you have any questions please contact Rebecca De Pont, Supervising Environmental Planner at (916) 255-3638 or [Rebecca.Depont@dtsc.ca.gov](mailto:Rebecca.Depont@dtsc.ca.gov).

Sincerely,

*Rebecca De Pont*

Rebecca De Pont  
Supervising Environmental Planner, Permitting Division  
Department of Toxic Substances Control

cc: (via electronic mail)

Mrs. Muzhda Ferouz  
Supervising Hazardous Substance Engineer II  
Department of Toxic Substances Control  
Hazardous Waste Management Program  
[Muzhda.Ferouz@dtsc.ca.gov](mailto:Muzhda.Ferouz@dtsc.ca.gov)

Mr. Wayne Lorentzen  
Permitting Division Chief  
Department of Toxic Substances Control  
Hazardous Waste Management Program  
[Wayne.Lorentzen@dtsc.c.gov](mailto:Wayne.Lorentzen@dtsc.c.gov)