

DOCKETED	
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ATTACHMENT B

Addendum

CEC Data Requests on additional topics

Fountain Wind Project Alternatives Data Requests Set 1

ALTERNATIVES

BACKGROUND: Off-site Alternative

Draft EIR Section 2.5.2 (Alternatives Rejected from Detailed Consideration) explains that an off-site alternative was not carried forward for consideration in the Draft EIR because the proposed project was considered consistent with Shasta County's planning and zoning designations for the project site in effect at that time. Draft EIR Section 2.5.2.1 states,

Because the land use and planning provisions that govern use of the proposed site contemplate potential wind energy use (Shasta County Code of Ordinances §17.08.030), the County has elected not to reconsider those determinations in the context of this EIR and instead is focusing on whether an environmentally superior version of the Project exists within the Project Site.

Draft EIR Section 2.5.3.1 further states that this approach is:

...consistent with the court's conclusion in Mira Mar Mobile Community v. City of Oceanside (2004) 119 Cal. App.4th 477, 492...[b]ecause the proposed project is consistent with the City's existing plans, policies and zoning, we conclude a review of alternative sites was not necessary.]

Since the public release of the 2020 Draft EIR and 2021 Final EIR documents, the Shasta County Board of Supervisors adopted Ordinance No. SCC 2022-04 on July 12, 2022, which amended Section 17.88.035 and Section 17.88.100 of the Shasta County Code, and added Section 17.88.335, effectively prohibiting large wind energy systems in all zone districts within the County's unincorporated areas. County Code Section 17.88.335 further states that no permit or approval of any type shall be issued for a large wind energy system. This prohibition includes unincorporated County areas that are within a Timber Production (TP) zone district, such as the proposed project site.

As a large wind energy system, the proposed project is no longer an allowable use in a TP zone district. The Energy Commission staff assessment of the proposed project will include an updated discussion of the County's laws, ordinances, regulations, and standards (LORS) and will evaluate the proposed project's inconsistency with the County's current applicable LORS, including the 2022 zoning ordinance. A LORS inconsistency would result in a significant impact under CEQA.

As stated in CEQA Guidelines Section 15126.6,

- (a) An EIR shall describe a range of reasonable alternatives to the project, or to the location of the project, 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,
- (b) ...even if those alternatives would impede to some degree the attainment of the

project objectives, or would be more costly.

DATA REQUESTS

1. Please provide a feasible alternative site for the development of a large wind energy system (outside of unincorporated Shasta County) that meets the basic project objectives, and include the following information:
 - a. A map illustrating the alternative site location;
 - b. Number of wind turbines and approximate size of the turbines that could be constructed;
 - c. Details on project components including access roads, substation/switching station, transmission line details (voltage, route, number of towers, etc.);
 - d. How the site meets the project objectives; and
 - e. Any other additional infrastructure and facilities that would be needed to support the development of a large wind energy system and its connection to the energy grid.

BACKGROUND: Small Wind Energy System Alternative

Ordinance No. SCC 2022-04, which was adopted by the Shasta County Board of Supervisors on July 12, 2022, amended Section 17.88.035 and Section 17.88.100 of the Shasta County Code to allow small wind energy systems in unincorporated areas with either an approved administrative permit or use permit, and to allow high voltage electrical transmission and distribution projects with an approved use permit.

Per Shasta County Code Section 17.88.035, part B, one wind turbine may be permitted with an approved administrative permit, and two or more wind turbines may be permitted with an approved use permit. Per Shasta County Code Section 17.88.035, part C, an approved administrative permit will allow tower heights of not more than sixty-five feet on parcels between one and five acres, and tower heights of not more than eighty feet on parcels greater than five acres, provided that the application includes evidence that the proposed height does not exceed the height recommended by the manufacturer or distributor of the system. Greater tower heights may be permitted with an approved use permit.

Given that small wind energy systems remain an allowable use within Shasta County's unincorporated area, distributed wind energy installations are a suitable technology for the alternatives analysis.

DATA REQUESTS

2. Please provide an alternative that considers the development of multiple small wind energy systems in Shasta County, consistent with Shasta County's Ordinance No. SCC 2022-04. This alternative should describe the additional infrastructure and facilities that would be needed to support the development of small wind energy systems in Shasta County that achieves the basic project objectives in lieu of one large wind energy project.

BACKGROUND: No Project Alternative Scenarios

CEQA Guidelines Section 15126.6 (e)(2) requires that the No Project Alternative must discuss two scenarios: (1) the existing conditions at the time that the Notice of Preparation 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. To provide for a meaningful evaluation of the No Project Alternative, these two scenarios must be updated as follows:

- **Existing Conditions.** The existing conditions for the No Project Alternative analysis has changed since the 2019 Notice of Preparation was issued for the proposed project, including applicable LORS. The Energy Commission staff analysis must consider the Shasta County Board of Supervisors adopted Ordinance No. SCC 2022-04, which allows for the development of small wind energy systems in unincorporated areas, as part of the existing conditions for the proposed project.
- **Reasonably Foreseeable Activities.** Regarding the scenario of what would be reasonably expected to occur in the foreseeable future, the Draft EIR Section 2.5.3.1 states that *“the Project boundary would continue to be managed for timber production”* and *“The same environmental benefits and impacts currently occurring would continue to occur.”* Other than ongoing timber production at the project site, there is no specific mention of activities to meet State of California renewable energy generation goals (i.e., SB 100) that are likely to occur in the absence of the proposed project. Projections of new renewable energy resource capacity that is needed to reach 100 percent carbon neutrality by 2045 have been developed by the SB 100 Joint Agencies (California Energy Commission, California Air Resources Board, and California Public Utilities Commission), and are summarized in their *2021 SB 100 Joint Agency Report: Achieving 100 Percent Clean Electricity in California: An Initial Assessment*.

DATA REQUESTS

3. Please provide the following for the No Project Alternative scenarios:
 - a. An updated discussion of existing conditions that addresses County Ordinance No. SCC 2022-04 which prohibits large-scale wind generation development (e.g., the proposed project) and seeks to site small-scale wind generation (e.g., potential future projects);
 - b. Existing activities or future anticipated activities in Shasta County to provide utility scale or small-scale renewable energy generation. For example, Hatchet Ridge Wind is an existing utility scale wind project that currently operates approximately one mile east of the proposed project and should be factored into the discussion of the No Project Alternative scenario to describe the area’s existing conditions with respect to current renewable energy generation; and
 - c. Reasonably foreseeable proposed projects or activities that will assist California in meeting the SB 100 renewable energy generation targets.

Fountain Wind Project Data Requests Set 1

LAND USE

BACKGROUND: Cumulative Impacts

Draft EIR Section 3.1.3.1 (Cumulative Scenario) describes a two-part approach for developing the proposed project's cumulative scenario: (1) projections contained in one or more local, regional, or statewide planning documents; and (2) the incremental effects of past, present, and reasonably foreseeable probable future projects. This approach is consistent with CEQA Guidelines Section 15130 (b)(1) that identifies the necessary elements for an adequate discussion of significant cumulative impacts. However, the Draft EIR Cumulative Scenario is incomplete, as described below:

Planning Document Projections. The Draft EIR Section 3.1.3.1 (Cumulative Scenario) states that the cumulative scenario includes “projections contained in one or more local, regional, or statewide planning documents.” However, Energy Commission staff have reviewed Draft EIR Section 3.1.3.1, and determined that there is no discussion of regional planning documents that address future growth or development plans in the area surrounding the proposed project site. Local and regional planning documents that project future growth in Shasta County help inform the cumulative scenario. Furthermore, given the adoption of Ordinance No. SCC 2022-04 by the Shasta County Board of Supervisors on July 12, 2022, future development of small wind energy systems may be a reasonably foreseeable development across unincorporated County areas.

Cumulative Projects Lists. The Draft EIR Section 3.1.3.1 (Cumulative Scenario) includes two tables of cumulative projects: Table 3.1-4 Potentially Cumulative County Projects, and Table 3.1-5 Other Potentially Cumulative Projects within Shasta County. According to the citations for these tables, the cumulative project lists were gathered in 2019 and do not include any projects that were proposed in the last three years (August 2019 – January 2023).

Future Applicant Activities. The Fountain Wind Project website describes future applicant activities that would be completed by the applicant to benefit the community following construction of the Fountain Wind Project (<https://www.fountainwind.com/benefits/>). The Draft EIR section 3.1.3.1 (Cumulative Scenario) does not include any reference to these future applicant activities in its discussion of “Other Present and Reasonably Foreseeable Future Projects. Future projects identified by the applicant on the proposed project website include the following:

- Fountain Wind Project and Fall River Resource Conservation District Fuel Break Project: Big Bend Road and Highway 299, which is described as follows:

The Fuel Break Project would reduce ladder fuels and establish a 300-foot-wide shaded fuel break totaling 23 linear miles, including 15 miles of Big Bend Road and 8 miles along Highway 299, representing approximately 873 total acres.

Source: <https://www.fountainwind.com/fuel-break-project-big-bend-road-and->

highway-299/

- Expanded Internet Service to Round Mountain, Montgomery Creek, Big Bend Communities, which is described as follows:

As part of the Project's Community Benefit Program, Fountain Wind has proposed to fund the installation of the two new towers and associated equipment, estimated at \$200,000.

Source: <https://www.fountainwind.com/proposal-for-expanded-internet-service-to-round-mountain-montgomery-creek-big-bend-communities/>

DATA REQUESTS

1. Please provide a updated information for the Cumulative Scenario that includes the following elements to support an adequate discussion of any potentially significant cumulative impacts that may be identified:
 - a. Local and regional planning projections for Shasta County;
 - b. Reasonably foreseeable future development of small wind energy systems as a result of 2022 amendments to the Shasta County Code;
 - c. An updated cumulative projects list that includes planned/proposed or permitted projects since August 2019; and
 - d. Future applicant activities (i.e., Fuel Break Project and Expanded Internet Service Project) with an updated description of the activity location and size, estimated number and types of construction equipment, and anticipated schedule for construction and maintenance.

BACKGROUND: Site Designations for Land Use and Zoning

The 2020 Draft EIR Figure 2-3 illustrates the Shasta County General Plan Land Use and Zoning Designations for the project site. However, Figure 2-3 only identifies the potential turbine locations relative to the General Plan Land Use and Zoning Designations and does not identify the locations of other project-related components and disturbance areas (i.e., collector lines, access roads, laydown areas, operations and maintenance facility, and substation and switchyard).

Furthermore, the proposed project configuration presented in Draft EIR Figure 2-3 is no longer accurate and will need to be updated to reflect the September 2021 project revisions that combine elements of the Draft EIR Alternative 1 (South of SR 299 Alternative) and Alternative 2 (Increased Setbacks Alternative).

DATA REQUESTS

2. Please provide an updated figure that includes the following:
 - a. Current Shasta County General Plan Land Use and Zoning Designations (as amended) for the project site;
 - b. The boundaries of the proposed Lease Hold Area; and

- c. The 2023 proposed project configuration and layout within the site boundaries that identifies the proposed location of the following: turbines, ground and overhead collector lines, access roads, temporary construction laydown areas, proposed operations and maintenance facility, proposed meteorological evaluation towers, storage sheds, temporary concrete batch plants, substation and switchyard, and relay microwave tower.

BACKGROUND: Conformance with LORS

The 2020 Draft EIR Section 3.1.4.10 describes the Shasta County Code sections that were relevant during preparation of the 2020 Draft EIR and 2021 Final EIR documents and concludes that the proposed wind project is an allowable use under each of the applicable zoning districts. However, this discussion of project conformity with applicable LORS did not provide detail on the consistency for each particular project component (e.g., turbines, access roads, laydown areas, proposed operations and maintenance facility, proposed meteorological evaluation towers, storage sheds, temporary concrete batch plants, substation and switchyard, and relay microwave tower).

Furthermore, the discussion does not address the ordinance adopted by the Shasta County Board 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.

Energy Commission staff will need to know what conditions Shasta County would attach to this project, were it the permitting agency.

DATA REQUESTS

3. For each specific land use and zoning designation traversed by the proposed project, please provide the applicable General Plan policies and zoning code section and Shasta County's consistency determination of each particular project component with each policy and zoning requirement, and justification for consistency.
4. Please describe the conditions that Shasta County would attach to this project, were it the permitting agency (but for the exclusive authority of the Energy Commission), in order to ensure the project's consistency with applicable LORS.

BACKGROUND: Land Uses within One Mile of Project

The discussion of land uses within the 2020 Draft EIR and 2021 Final EIR documents focuses almost entirely on the activities that are within the proposed site boundaries, with little to no information on other land uses within one mile of the proposed project. The following example from Draft EIR Section 3.1.4.10 Land Use illustrates the lack of information for land uses in the surrounding area,

The Project Site is privately-owned timberland located approximately 6 miles west of Burney, 35 miles northeast of Redding, and near the private recreational facility of Moose Camp. Other communities near the Project Site include

Montgomery Creek, Round Mountain, Wengler and Big Bend. None would be physically divided by the Project.

Energy Commission staff note that the Agricultural analysis in Draft EIR Section 3.1.4.1 identifies a 110-acre site of Prime Farmland approximately 0.25 mile southeast of the nearest turbine. However, no further information is provided regarding a figure or description of the location of this Prime Farmland relative to other proposed project structures or activities, crop types and farming activities, and whether the 110-acre site is subject to an Agricultural Land Conservation contract (which would be administered and managed by Shasta County).

DATA REQUESTS

5. Please provide a list of current existing land uses (residential, recreational, commercial, industrial) within one mile of the project site boundaries. Please include a map illustrating the location of these land uses relative to the proposed project (turbines, ground and overhead collector lines, access roads, temporary construction laydown areas, proposed operations and maintenance facility, proposed meteorological evaluation towers, storage sheds, temporary concrete batch plants, substation and switchyard, and relay microwave tower).
6. Please provide a map illustrating the location of the 110-acre Prime Farmland relative to the proposed project (turbines, ground and overhead collector lines, access roads, temporary construction laydown areas, proposed operations and maintenance facility, proposed meteorological evaluation towers, storage sheds, temporary concrete batch plants, substation and switchyard, and relay microwave tower).
7. Describe the historic and current agricultural activities occurring at the 110-acre Prime Farmland site, and discuss the applicable crop type(s), irrigation systems, and any special cultivation practices.
8. Identify whether the 110-acre Prime Farmland site is subject to an Agricultural Land Conservation contract. If this land is under contract, identify the length of the contract, the time remaining under the current contract, and whether the contract status is designated as renewal or non-renewal.

BACKGROUND: Site Control

The Shasta County Use Permit Application (TN#248330-6) includes a memorandum between the applicant (Pacific Wind Development LLC) and the property owner (Oxbow Timber I, LLC) for a Combined Wind Energy Lease. This memorandum is dated March 2, 2016. The Use Permit Application also includes a table of assessor parcel numbers (APNs) within the project area (Exhibit 1) and a map of the proposed lease area (Exhibit C), which were prepared in 2016.

The proposed project docket includes the file Project Parcel Locational Data (TN#248330-3), which is dated April 12, 2022. This file only includes a list of parcel information (APNs, section, township, range, acreage) and does not include a figure that identifies the location of these parcels relative to the proposed project components. It is unclear to Energy Commission staff if this list of project parcels has been updated

to reflect only the parcels required for the construction of the most recent proposed project configuration.

DATA REQUESTS

9. Please provide a list of all parcels and their APNs within the current 2023 proposed project site boundary, and a figure that identifies the location of proposed project components relative to each parcel (turbines, ground and overhead collector lines, access roads, temporary construction laydown areas, proposed operations and maintenance facility, proposed meteorological evaluation towers, storage sheds, temporary concrete batch plants, substation and switchyard, and relay microwave tower).
10. Provide the terms of the Wind Energy Lease between the Applicant and property owner (Oxbow Timber I, LLC).
11. Discuss whether any parcel mergers would occur as part of the proposed project. Provide details on what parcels would be included in the merger, and what project components would be sited or staged on the merged parcels. Describe any communications that have occurred with Shasta County regarding parcel mergers, and any requirements identified by the County to approve a parcel merger.
12. Identify any recorded restrictions on the project site that preclude development, and identify which parcels these restrictions apply to.

Fountain Wind Project

Socioeconomics Data Requests Set 1

SOCIOECONOMICS

BACKGROUND: Population and Housing – Social Characteristics

Section 3.1.4.13 Population and Housing, Growth Inducement from the 2020 Draft EIR (TN#248288-3) states,

No one lives within the Project Site. Therefore, neither the Project nor an alternative would displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere.

There is no further discussion or baseline information for the population characteristics in the vicinity of the project site in this section. US Census data indicates small populations residing within the census blockgroup that the Project Site falls within, as well as adjacent blockgroups. Energy Commission staff have noted that docketed file TN# 248320-2 (Figure – Disadvantaged Communities) identifies four communities in the Fountain Wind Project Vicinity as SB 535 Disadvantaged Communities. Neither the Draft EIR or Final EIR include a discussion or description for the figure that defines the vicinity (or study area), the definition of disadvantaged communities, or the size of the populations within them.

DATA REQUESTS

1. Please define the project vicinity and include an explanation for the boundaries of this area (i.e., define the study area).
2. Please provide discussion of demographic and community trends, including the following:
 - a. Provide the low-income population percentage living in Shasta County and within the communities closest to the project site.
 - b. Provide the minority population percentage living in Shasta County and within the communities closest to project site.

BACKGROUND: Population and Housing – Economic Characteristics

Page 4 of the Economic and Public Revenue Impact Study (TN# 248292-2) states, *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.*

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.

DATA REQUESTS

3. Please provide a discussion of economic base and fiscal resources in the project area.
4. Please provide a list of the applicable local agencies with taxing powers and their most recent and projected revenues.

BACKGROUND: Employment – Worker Estimates

Section 3.1.4.14 Public Services from the 2020 Draft EIR (TN#248288-3), page 3.1-21 states,

With respect to employment, the Project would require up to 400 on-site personnel, comprised of a combination of local and specialized (non-local) workers, during the projected 18- to 24-month construction period.

The 2023 Executive Summary and Project Description (TN# 248322) agrees with this statement on page 12, and further states on page 13 that the project operation would require up to 12 full-time employees.

However, there is a discrepancy on these workforce numbers in the docketed files. The Economic and Public Revenue Impact Study (TN#248292-2) indicates on page 4 that the project will require 200 employees during peak construction months. Page 7 of this study indicates electricians, ironmen, and other skilled labor will be needed in addition to general labor but does not specify the number of workers needed for each specialized skill. During operation, the study estimates that the project will create 42 ongoing jobs (page 2) and 8 fulltime employees over the project lifetime (pages 4, 7).

Regarding the labor pool, Draft EIR Section 3.1.4.14 also states,

The existing construction labor pool in Shasta County is sufficient to meet the Project's non-specialized labor needs.

However, the construction labor pool is not referenced in the 2020 Draft EIR or the 2021 Final EIR documents. Additionally, the unemployment rate is used to justify the project's availability of general laborers. While the Draft EIR Introduction to Environmental Analysis provides the 2018 unemployment rate for Shasta County on page 3.1-21, Energy Commission staff will need to consider more recent data for an up-to-date analysis.

DATA REQUESTS

5. Please provide information on the skilled workers by craft required for construction. Please include the specific job types and number of workers anticipated on average over the entire construction period, and during the peak construction phase.

6. Please provide information on the skilled workers by craft required for operation of the project. Please include the specific job types and number of workers.
7. Please state the portion of the construction and operation workforce which the applicant anticipates would be local (i.e., from Shasta County), and the expected non-local portion.
8. Please provide availability for each type of skilled worker in Shasta County, or where this labor force is anticipated to come from and the associated commute shed (i.e., exceeding a 2-hour commute shed) for Fountain Wind's non-local workers. Please include this information separately for both construction and operation.
9. Please provide information on the availability of each type of skilled worker in the areas where the labor force is expected to originate.
10. Please provide updated unemployment rates for Shasta County and the defined project vicinity.

BACKGROUND: Employment – Accommodations

Section 3.1.4.14 in the Fountain Wind Draft EIR Introduction to Environmental Analysis (TN#248288-3), page 3.1-21 states,

With respect to employment, the Project would require up to 400 on-site personnel, comprised of a combination of local and specialized (non-local) workers, during the projected 18- to 24-month construction period. The existing labor pool in Shasta County is sufficient to meet the Project's non-specialized labor needs. Non-local workers would stay at local hotels and commute to the Project Site from Redding, Burney, Fall River Mills, or McArthur.

Footnotes used to justify the above statement include, "A review of hotels in Burney, Fall River Mills, McArthur, and Redding using Google Travel indicated that there are 49 hotels and motels within the four towns," based on information from 2020, and "Shasta County's vacancy rate for residential rentals is higher than the national average: 3.82 percent compared to 2.34 percent," based on Sperling's BestPlaces in 2017.

To provide a meaningful analysis on the sufficiency of accommodations for the temporary workforce, Energy Commission staff will need to consider data that reflects the current conditions.

DATA REQUESTS

11. Please provide detailed information on the local accommodations available in surrounding areas (e.g., Burney, Fall River Mills, McArthur, and Redding) based on current information. This information can be provided in tabular format by location. In addition to the number of the hotels/motels in the area, please include trends (excluding 2020-2021 because of COVID impacts on hotel/motel accommodations) of the availability of these hotels/motels.

12. Some construction personnel may choose to utilize nearby Recreational Vehicle (RV) parking or camping options. Please include baseline information on available RV parking or camping in the study area analyzed for the proposed project.
13. Indicate if any project personnel/workers would reside on the project site in RVs or would camp onsite.

BACKGROUND: Public Services and Recreation

Section 3.1.4.14 in Draft EIR Introduction to Environmental Analysis (TN#248288-3) includes discussion of Public Services on pages 3.1-21 to 3.1-29. A detailed discussion of Utilities and Service Systems, including capacities and anticipated use for the project, is provided in the Draft EIR Utilities and Service Systems (TN#248288-17) on pages 3.15-2, 3.15-9. This level of detail is not included for fire protection, law enforcement, and medical facilities.

For fire protection, page 3.1-22 references multiple fire control agencies; however, only CAL FIRE's performance objectives are discussed. Because multiple agencies are operating in the project vicinity, a meaningful analysis will need to include discussion of all relevant agencies.

For Recreation, page 3.1-24 of the Draft EIR Intro to Environmental Analysis Section 3.1.4.15 states,

Although there are no parks on or in the immediate vicinity of the Project Site, scoping input suggests that the Project would affect areas that provide recreation based on swimming, hunting and fishing, hiking, biking, cross-country skiing, snowmobiling, and bird watching (Appendix J). The Project Site is private property. Indications of the landowner's intent to exclude the general public from the Project Site include fences, locked gates, and no trespassing signs. Because there is no right to trespass, the proposal to enforce restrictions of public access is not considered an impact to recreation as anticipated in CEQA Guidelines Appendix G Section XVI.

Although the project site is private property, recreation in the vicinity of the project site could be impacted, and thus needs to be included in the CEQA analysis. Additionally, the 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 (<https://www.fountainwind.com/wp-content/uploads/2021/06/Fountain-Wind-SCT-Community-Access-Outline.pdf>).

DATA REQUESTS

14. Please provide the response time goals and the capacities/ability to meet those public safety response goals for all local agencies providing services to the project pertaining to fire protection, law enforcement, and medical facilities. Please include current response times and other relevant metrics. This information can be provided in tabular format for all applicable agencies that would serve the proposed project.

15. Please discuss potential impacts to recreation in the vicinity of the project site (e.g., project personnel use of area resources such as campgrounds, etc.). Include explanation of the project vicinity boundaries (i.e., define the study area analyzed).
16. Please 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?

BACKGROUND: Construction Costs

As discussed under the Data Request for “Employment – Worker Estimates,” there is a discrepancy on the workforce numbers in the docketed files. It is unclear if the results of the analysis described in Table 1 of the Economic and Public Revenue Impact Study (TN#248292-2) are using up-to-date assumptions of the number of workers.

Construction

- 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 2023 Executive Summary and Project Description states that the project would require up to 400 workers.

Operation

- Table 1 in the Economic and Public Revenue Impact Study assumes that there will be 42 annual operations jobs, while page 4 of the study estimates 8 full-time employees throughout the project lifetime.
- Page 13 of the 2023 Executive Summary and Project Description (TN# 248322) states the project operation would require up to 12 full-time employees.

DATA REQUESTS

17. Please provide the direct, indirect, and induced impacts of the proposed project and provide updated and/or correct numbers and assumptions (in Tables 1, 4, and 5 in the Economic Impact Study) of construction and operations workers.
18. Please provide an estimate of the total construction payroll and separate estimates of the total operation payroll for permanent and short-term (contract) operations employees.
19. Please provide an estimate of the capital cost (plant and equipment) of the project.