

<b>DOCKETED</b>	
<b>Docket Number:</b>	23-OPT-01
<b>Project Title:</b>	Fountain Wind Project
<b>TN #:</b>	253341
<b>Document Title:</b>	Native Roots Network Comments - Public Comment - Opposing Fountain Wind
<b>Description:</b>	N/A
<b>Filer:</b>	System
<b>Organization:</b>	Native Roots Network
<b>Submitter Role:</b>	Public
<b>Submission Date:</b>	11/27/2023 11:58:22 PM
<b>Docketed Date:</b>	11/28/2023

*Comment Received From: Native Roots Network  
Submitted On: 11/27/2023  
Docket Number: 23-OPT-01*

## **Public Comment - Opposing Fountain Wind**

Dear CEC Staff and Commissioners,

Thank you for the opportunity to comment on the proposed Fountain Project. On behalf of the Native Roots Network, we oppose the proposed development of an industrial-scale wind farm along our eastern foothills.

Native Roots Network is a Shasta County based, community-based organization dedicated to advancing the vitality of Indigenous People and other community members. For nearly twenty years we have worked with our community to support youth leadership, arts and cultural expression, health, cultural restoration, and sacred site protection. We support the Pitt River Tribe's determination that this project will adversely impact the land, cultural resources and the ability to practice cultural continuity. We stand in solidarity with their decision to oppose Fountain Wind.

Furthermore, we offer the following responses to the questions that CEC shared for the Public Hearing 11/28/2023.

1. CEC staff identified probable significant environmental effects across multiple topic areas including tribal cultural resources, biological resources, visual resources, and wildfire in its Notice of Preparation. Are there mitigation measures sufficient to reduce these impacts below the level of significance? What additional mitigation measures might CEC staff consider to further reduce impacts in these topic areas?

We thank the CEC for acknowledging the significant environmental impacts the 2,855-acre wind project would have if developed. The existing Hatchet Wind project demonstrated for us the full-scale destruction of the mountaintop forest ecology. Where once there were trees, now is a large stripe of barren land, stripped of vegetation for wind turbine access. There are no "sufficient" mitigation measures that would lessen the massive impact the proposed turbines and road development would have on the rural and mostly forest-covered area. The impacts on tribal cultural resources would be immense, as cultural resources are both site-specific and also encompass a holistic understanding and relationship to the landscape, wildlife, visual resources, and soundscapes.

The turbines and their supporting infrastructure would continue a legacy of extraction and exploitation for the good of others outside the region. Shasta County's rural, poor, and Native population will bear the brunt of this proposed development, continuing

the patterns of inequity the State has identified and has pledged to change. Much like the impounding of the Sacramento, McCloud and Pit Rivers behind Shasta Dam, flooding thousands of acres, devastating fisheries and forever changing the region, this proposed project will perpetuate our community as the sacrifice zone, the source point for extraction and impact, from which others benefit. The only real mitigation is changing the project entirely; building closer to points of sale and consumption of the power produced.

2. Are there other topic areas in which the proposed project creates a potential significant environmental effect?Â

As we continue to see the drastic changes in fire weather and fire behavior due to shifting biomes and other impacts of climate change, we understand the dire need to decarbonize our economy as fast as possible. We see firsthand the devastation wrought by mega-fires that were once far and few between and are now a near-regular occurrence. We also are aware of the projections for our region showing increased fire intensity, at catastrophic levels if we do not reduce our carbon release. We are aware of the contradiction we must straddle as we seek to stop this industrial wind farm and protect the forest woodlands while we continue to experience, firsthand the impacts of climate change. We know that we must help maintain woodlands. We know that we canâ€™t continue to â€œdevelopâ€, â€œdevelopâ€, developâ€. We must preserve and protect our woodlands for our hydrologies, our wildlife, and our future generations. As we have seen with Hatchet Ridge, these projects forever change landscapes.

3. The proposed project is inconsistent with the Shasta County ordinance which bans large-scale wind projects and concludes that such projects have no positive economic benefit to the county. The opt-in law authorizes the CEC to approve a project despite a conflicting local ordinance. What factors are most important and should be considered by CEC staff in developing a recommendation for or against approval of the project despite the inconsistency with the local ordinance?

While our current elected County officials may believe in fantastical conspiracies and want to fight the State on issues that have been politicized, oftentimes with no factual basis, they did pass the ordinance banning large-scale wind farm development with the support of a large portion of the local population from all aspects of the political spectrum. The rural citizens of Shasta County want to live in rural places and donâ€™t want to be next-door neighbors with industrial energy production sites.Â

4. What value to state goals, such as meeting renewable energy and greenhouse gas

emission reduction targets, does the project and its 205 MW of renewable energy generation bring, if any? What value to local consumer benefits, local environmental goals, and grid reliability within the county does the project create, if any?

While not knowing what plans are being drafted, we have lived with the Hatchet Ridge Project for over 15 years, watching the blades turn, the power produced and sent past our communities, and in the next breath, experience unplanned and planned power outages and now increased rates.

5. The applicant is proposing to contract with the Community Foundation of the North State to fund grants to meet the legal requirement for the applicant to enter into one or more legally binding and enforceable agreements with or that benefit, a coalition of one or more community-based organizations. Does such an agreement provide community-based benefits? What types of projects should be funded to benefit local communities?

Although it will be like accepting some type of blood money, the Fund should consider supporting independent and small-scale micro-grid development, helping residents produce, store, and use their own power. The Fund should consider supporting land buyouts/ managed retreat from residents impacted by the development, or others considering selling for future development. The Fund also should support the development of land trusts and other preservation mechanisms.Â Â

6. Are there alternative renewable energy generation technologies or project sites the state should consider instead of the Fountain Wind's potential energy generation of 205 MWs?

It takes approximately 6-8 acres of solar to produce 1 megawatt of power. The proposed project's footprint is 2855 acres. If that footprint was solar it would produce 356 Megawatts, rather than the 205 projected by the wind project. The State should consider subsidizing more parking lots, rooftop, and freeway easement solar development. Impact and develop the areas already impacted and developed. Leave the forest lands forested, and the rural places, rural.

We opposed the development of the Fountain Wind Project the first time it came around, and we oppose its development now. Please listen to the citizens most directly impacted by the proposed project and stop Fountain Wind.

Signed,

Jonathon Freeman

Co-Director  
Native Roots Network