

DOCKETED

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Project Title:	Fountain Wind Project
TN #:	253576
Document Title:	California Pilots Association (CalPilots) Comments in Opposition to the Proposed Fountain Wind Project
Description:	N/A
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Organization:	California Pilots Association
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*Comment Received From: California Pilots Association
Submitted On: 12/11/2023
Docket Number: 23-OPT-01*

California Pilots Association (CalPilots) Comments in Opposition to the Proposed Fountain Wind Project

Additional submitted attachment is included below.



December 4, 2023

California Energy Commission
Docket Unit MS-4, Docket No. 23-OPT-01
715 P Street, Sacramento, CA. 95814

Delivered by Hand, December 4th, 2023

Subject: California Pilots Association (CalPilots) Comments in Opposition to the Proposed Fountain Wind Project, Docket No. 23-OPT-01

Dear California Energy Commission,

The California Pilots Association mission is to Preserve, Protect and Promote the state's airports, and airspace for safe navigation. As a statewide 501c3 volunteer organization, we work tirelessly to maintain the State's airports, and airspace, in the best possible condition for the benefit of the aviation community, and it's economic contributions to the enterprises of California's vibrant and diverse industrial sectors.

The **California Pilots Association is very opposed** to the Modified Fountain Wind project, for the many potential hazards to local communities and aerial navigation around this project, located at Latitude 40 deg, 50' 0" W. Longitude 121 deg, 50' 0" E, which is located approximately 6 miles west of Burney, and 35 miles northeast of Redding, CA. Our initial letter of October 20, 2020 in opposition, was submitted to the Shasta County Department of Resource Management, Planning Division, has been enclosed for your review.

California Pilots Association fully participated in both the Shasta County Planning Commission and the Shasta Board of Supervisors public hearings on this matter in 2020 and 2021. The Shasta Planning Commission unanimously denied this project, and was further rejected by the Shasta Board of Supervisors by a 4 to 1 vote. In addition given the extensive hazards to the community of potential uncontrollable fires, environmental damage to both soil and water resources, Shasta County passed a moratorium on any new large scale Wind generation projects for the preservation and protection of the unique resources of this region.

Shasta County has endured many forest fires over the decades and there is a deep concern in the community to reduce this potential by every means possible. Furthermore, in the previous hearings on the Fountain Winds project is became apparent that **IF** this project were to be build there is a very strong possibility that local residents would not be able to obtain home owner insurance due to the increased fire hazard risk. In fact Insurance companies are beginning to not renew insurance policies



for some California residents, and regions, due to excessive insurance losses from such fires in the past decade. This is a factual economic hazard that the applicant wishes to gloss over. If Homeowners lose their insurance coverage, that could lead to mortgages being called, and/or loss of property values. This is a major reason why the wind farm moratorium was passed by Shasta County to protect their community.

Aerial fire fighting is a complex, and hazardous, endeavor in the best of circumstances. When you add the dynamics of terrain, winds aloft, density altitude and wind farm obstacles, a **NO FLY ZONE** is created, and thus severely impacts the ability of CalFIRE to do their job to protect property and life. Insurance actuaries are looking at these factors and making business choices for potential insurance rates, or even if they will write policies in regions with high fuels regions, like the forrests of Shasta County.

One troubling fact that was uncovered during my research in 2020 and 2021 is enclosed with the highlighted Klamath Falls aeronautical section chart which focuses on Redding, the current Hatchet Ridge (orange highlight, altitude 5931 feet, the blue lines are power transmission lines in the region) wind farm and the proposed Fountain Wind project area. The yellow highlighted sectional square has three meteorological towers (red dots) that were constructed in 2010. These appear to be owned by a Enel Green Power North America, based in San Diego, California (see enclosed FAA Forms 7420-1).

This implies a much larger scope of potential wind farm projects in this high forest fuels region in the decades to come, and should be denied to respect Shasta County's wind farm moratorium to protect people and property for generations to come.

Our society does need base load electrical power generation, but intermittent wind and solar power generation, will not meet those electrical power needs in the long term. We do have other energy technologies that are well proven over the decades. The CEC should ask NASA, or the US Navy, how they generate concentrated electrical power.

Respectfully,

J. Gill Wright
FAA Aircraft Dispatcher #3658363
VP Region 2
California Pilots Association
ph 916-692-8203
cell 303-435-8178

CC:

Carol Ford, President, California Pilots Association
Andy Wilson, Director at Large, California Pilots Association
Paul Holmquist, Federal Aviation Administration



October 20, 2020

Lio Salazar, Senior Planner
Shasta County Department of Resource Management, Planning Division
1855 Placer Street, Suite 103
Redding, CA 96001
Email: fw.comments@co.shasta.ca.us

Subject: California Pilots Association (CalPilots) Comments Regarding the Proposed Fountain Wind Project

Dear Mr. Lio Salazar,

The California Pilots Association mission is to Preserve, Protect and Promote the state's airports, and airspace for safe navigation. As a statewide 501c3 volunteer organization, we work tirelessly to maintain the State's airports, and airspace, in the best possible condition for the benefit of the aviation community, and its economic contributions to the enterprises of California's vibrant and diverse industrial sectors.

The **California Pilots Association** is very concerned regarding the potential hazards to aerial navigation of the Fountain Wind Project, located at Latitude 40 deg, 50' 0" W. Longitude 121 deg, 50' 0" E, which is located approximately 6 miles west of Burney, and 35 miles northeast of Redding, CA.

From an aeronautical perspective the combined Hatchet Ridge Wind Farm (HRWF) and the proposed Fountain Wind Project (FWP) will create a lateral barrier of wind turbines approximately 7 miles from North to South, for aircraft to fly over. This FWP location will have 72 wind turbines, with an Above Ground Level (AGL) height of 679 ft. With the terrain of this wind farm's base locations varies from 3,737 to 5,328 ft Measured above Sea Level (MSL). Given the terrain, location, and combined 679 ft. height of these turbines there will be an aeronautical wall approximately 1,591 ft tall, that the resultant top of the turbine blades will reach from 4,386 ft to 6,007 ft MSL for aircraft to fly over.

The location is a regional low point, and valley in the flight path to airports between Redding (KRDD) and a string of airports heading to the North East beginning with Fall River Mills (KO89), Southard (KO55), Adin (KA26), California Pines (KA24), Alturas (KAAT), Cederville (KO59), and Lake County (KLKV). There is a concern of the hazard to aerial navigation for these communities from these proposed structures.



It should be noted there is AREO MEDICAL services from these rural airports for critical emergency medical services located in Redding. Furthermore, this area is prone to aerial firefighting operations by CalFire, when there are fires in the region. In addition, the afore mentioned airports are used by the flying public to access properties in this remote region of Northern California. Often times they will stop in Redding for fuel, and/or provisions, prior to going to these mountain airports.

With the physical penetration of the National Airspace (NAS) from this wind farm, there is a question of both the down wind turbulence of this wind farm complex, and would the field of rotating turbine blades interfere with local VOR-DME navigation aids located in Redding and Red Bluff? When flying in mountainous regions there are additional pilot concerns of Mountain Wave Turbulence, and Density Altitude issues that affect aircraft performance in these higher altitudes. These issues can be adversely compounded on hot summer days, which frequent the region from May thru October.

Furthermore, there are aerial military training operations in this region. The proposed Fountain Valley Project appears to brush against the Northwest edge of the WHITMORE 2 MOA. To the north of this wind farm site is the VR1250 and VR1261 Military Training Routes (MTR). It is highly likely these MTRs are used by Klamath Falls and Beale Air Force bases, and other military bases within a 500 mile radius. Comments of impacts on both Air Force, Naval and Marine aerial training missions in these areas will have to come from these branches of the US Department of Defense, and/or, the FAA directly regarding this project.

Finally, there is a concern of navigational lights on top of the Wind Turbine Nacelles. The proposed wind turbines have requirements for red navigation lights to be located on top of the tower nacelle. Given the blade lengths are up to 211 ft in length from the nacelle, are these blade tips to be illuminated too?

It is my understanding of FAA regulations, that any obstacle in the NAS over 200 ft AGL is to be marked with a Red light for identification by pilots. It seems reasonable and prudent by extension that a 211 ft long rotating turbine blade be identified in a similar manner. I have asked the FAA for clarification and/or determination on this question, but at the time of writing this letter of comment, there is no further regulatory information of wind turbine blade illumination.

It would be a prudent safety requirement for a light beacon on the end of these blades. With the maturity, and durability, of LED lights it seems like a cost effective and reasonable safety feature to add in the manufacture of this equipment. One would assume that there are grounding straps already in the structure of these blades to protect a wind turbine from potential lightning strikes, and thus there should be a



page 3

pathway to electrify a tip LED light for aircraft flight safety with a minimum of additional manufacturing costs.

In preparation for this letter of comment regarding the Fountain Wind Project, the FAA's Obstruction Evaluation information regarding wind farms was reviewed. This included "interim" information regarding the Fountain Wind Project. Apparently, the developer of this project submitted site information, was received by the FAA on 5/21/2020, and was posted by the FAA on 10/16/2020. There is NO FORMAL DETERMINATION FROM THE FAA on the project, at this time, as to the hazards to navigation of this project. The FAA aeronautical study of this wind farm project will be completed at some point in the future.

I believe the various issues raised in this letter of comment, will take time to resolve in a safe manner for the benefit of the community. If there are any questions on the details presented, I can be contacted for further inquiry.

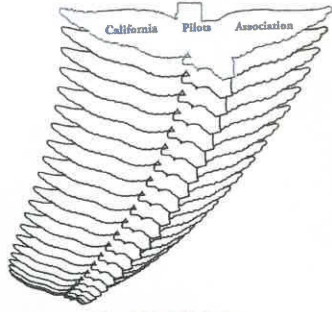
Thank you.

Respectfully submitted, (electronically)

Gill Wright
FAA Aircraft Dispatcher #3658363
VP Region 2
California Pilots Association
ph 916-692-8203
cell 303-435-8178

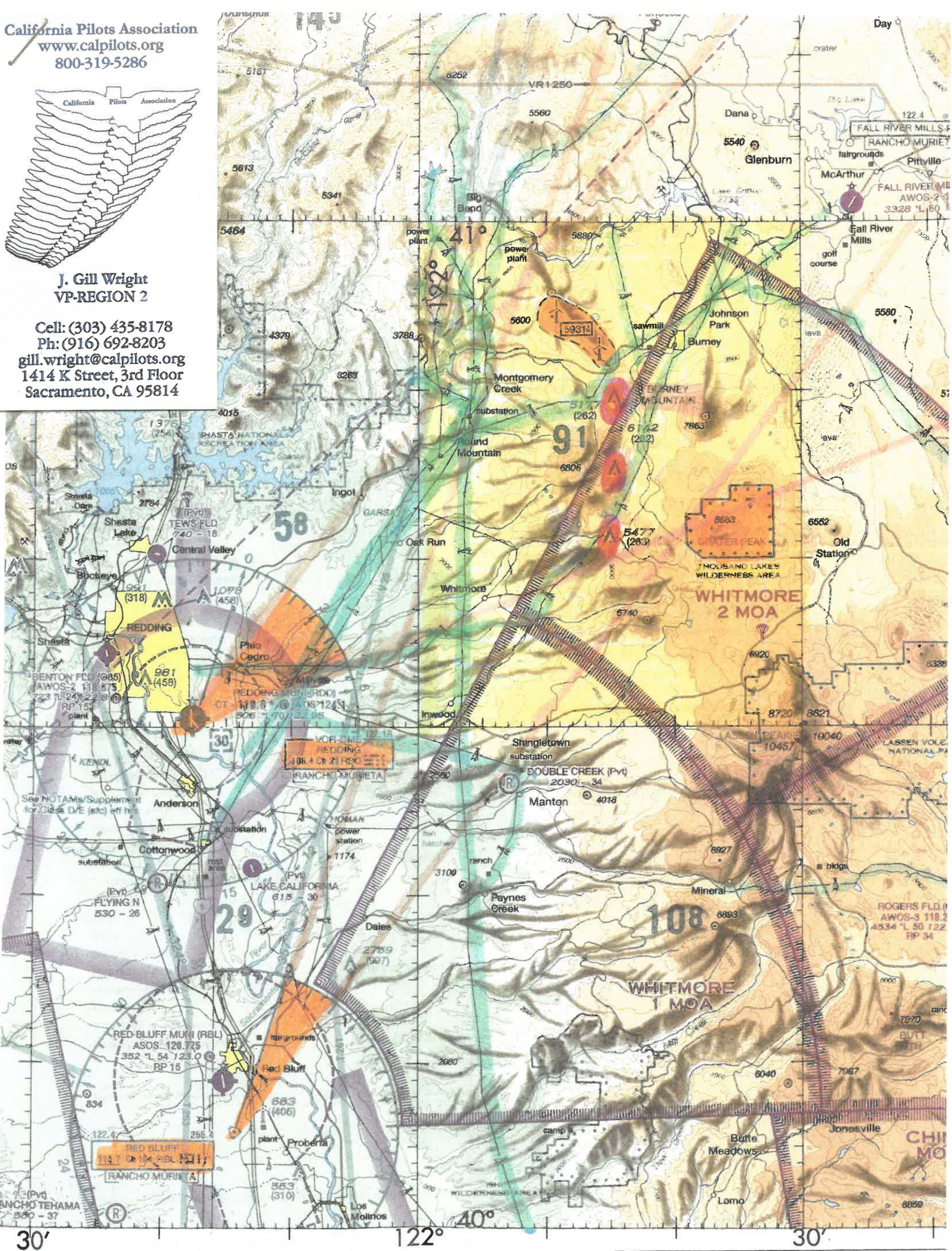
CC:

Carol Ford, President, California Pilots Association
Andy Wilson, Director at Large, California Pilots Association
Melissa McCaffery, Aircraft Owners and Pilots Association
Paul Holmquist, Federal Aviation Administration



J. Gill Wright
VP-REGION 2

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Federal Aviation Administration

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Circle Search for Cases Results Form 7460-1 for ASN 2010-WTW-12707-OE

Overview	
Study (ASN):	2010-WTW-12707-OE
Prior Study:	
Status:	Determined
Letters:	Determination
7460-2 Forms:	04/17/2012
Supplemental Form 7460-2: Please login to add a Supplemental Form 7460-2.	
Received Date: 08/24/2010	
Entered Date: 08/24/2010	
Completion Date: 11/16/2010	
Expiration Date: 05/16/2012	
Sponsor Information	
Sponsor:	Burney Wind Project, LLC
Attention Of:	Anicia Soares
Address:	7777 Fay Avenue
Address2:	Suite 200
City:	La Jolla
State:	CA
Postal Code:	92037
Country:	US
Phone:	858-731-5011
Fax:	858-731-5049
Sponsor's Representative Information	
Representative:	Enel Green Power North America
Attention Of:	Anicia Soares
Address:	3636 Nobel Drive
Address2:	Suite 475
City:	San Diego
State:	CA
Postal Code:	92122
Country:	US
Phone:	858-731-5011
Fax:	
Construction Info	
Notice Of:	CONSTR
Duration:	PERM (Months: 0 Days: 0)
Work Schedule:	10/04/2010 to 10/08/2010
Date Built:	08/09/2011
Structure Summary	
Structure Type:	Met Tower (w/WT Farm)
Structure Name:	Met B
FCC Number:	
Structure Details	
Latitude (NAD 83):	40° 45' 02.59" N
Longitude (NAD 83):	121° 44' 37.21" W
Horizontal Datum:	NAD 83
Survey Accuracy:	4D
Marking/Lighting:	Red lights and paint
Other Description:	
Current Marking/Lighting:	N/A New Structure
Current Marking/Lighting Other Description:	
Name:	
City:	Redding
State:	CA
Nearest County:	Shasta
Nearest Airport:	No Airport within 12NM
Distance to Structure:	
On Airport:	No
Direction to Structure:	
Description of Location:	Approx. 34 Miles north-east of Redding, CA & approx. 13 miles south-west of Burney, CA
Description of Proposal:	Installation of a Met Tower
Height and Elevation	
	Proposed DNE DET
Site Elevation:	5880
Structure Height:	262 0 262
Total Height (AMSL):	6142 0 6142
Frequencies	
Low Freq	High Freq
Unit	ERP
Unit	Unit

Previous [Back to Search Result](#) Next



Federal Aviation
Administration

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Circle Search for Cases Results Form 7460-1 for ASN 2010-WTW-12708-OE

Overview			
Study (ASN):	2010-WTW-12708-OE		
Prior Study:			
Status:	Determined		
Letters:	Determination		
7460-2 Forms:	11/16/2010 08/05/2011 08/05/2011		
Supplemental Form 7460-2: Please login to add a Supplemental Form 7460-2.			
Sponsor Information			
Sponsor:	Burney Wind Project, LLC		
Attention Of:	Anicia Soares		
Address:	7777 Fay Avenue		
Address2:	Suite 200		
City:	La Jolla		
State:	CA		
Postal Code:	92037		
Country:	US		
Phone:	858-731-5011		
Fax:	858-731-5049		
Construction Info			
Notice Of:	CONSTR		
Duration:	PERM (Months: 0 Days: 0)		
Work Schedule:	10/04/2010 to 10/08/2010		
Date Built:	11/16/2010		
Structure Details			
Latitude (NAD 83):	40° 49' 12.90" N		
Longitude (NAD 83):	121° 44' 37.21" W		
Horizontal Datum:	NAD 83		
Survey Accuracy:	4D		
Marking/Lighting:	Red lights and paint		
Other Description:			
Current Marking/Lighting:	N/A New Structure		
Current Marking/Lighting Other Description:			
Name:			
City:	Redding		
State:	CA		
Nearest County:	Shasta		
Nearest Airport:	No Airport within 12NM		
Distance to Structure:			
On Airport:	No		
Direction to Structure:			
Description of Location:	Approx. 34 Miles north-east of Redding, CA & Approx. 13 miles south-west of Burney, CA		
Description of Proposal:	Installation of a Met Tower		
Sponsor's Representative Information			
Representative:	Enel Green Power North America		
Attention Of:	Anicia Soares		
Address:	3636 Nobel Drive		
Address2:	Suite 475		
City:	San Diego		
State:	CA		
Postal Code:	92122		
Country:	US		
Phone:	858-731-5011		
Fax:			
Structure Summary			
Structure Type:	Met Tower (w/WT Farm)		
Structure Name:	Met - H		
FCC Number:			
Height and Elevation			
	Proposed	DNE	DET
Site Elevation:	4915		
Structure Height:	262	0	262
Total Height (AMSL):	5177	0	5177
Frequencies			
Low Freq	High Freq	Unit	ERP
			Unit

Back to
Previous Search Next
Result