

DOCKETED

Docket Number:	23-OPT-01
Project Title:	Fountain Wind Project
TN #:	253663
Document Title:	National Park Service Comments - Night sky impacts to two nearby National Park sites and communities
Description:	N/A
Filer:	System
Organization:	National Park Service
Submitter Role:	Public Agency
Submission Date:	12/18/2023 4:14:26 PM
Docketed Date:	12/18/2023

*Comment Received From: Jim Richardson, National Park Service
Submitted On: 12/18/2023
Docket Number: 23-OPT-01*

Night sky impacts to two nearby National Park sites and communities

Additional submitted attachment is included below.



United States Department of the Interior

Lassen Volcanic National Park
Pacific West Region
38050 Hwy 36 E
Mineral, CA 96063



IN REPLY REFER TO:

(LAVO-L76)

ELECTRONIC SUBMISSION ONLY

California Energy Commission
Fountain Wind Project comments
715 P Street
Sacramento, California 95814

Dear California Energy Commission:

Lassen Volcanic National Park and Whiskeytown National Recreation Area are within the potential maximum viewshed of the proposed Fountain Wind Project. We would like to collaborate with you to develop measures that would protect night skies within Lassen and Whiskeytown from possible impacts associated with this development. Protection of night skies is important to the visitor experience of park visitors, as well as for surrounding public lands and nearby communities.

At both parks, protecting photic resources, lightscapes, and naturally dark skies is related to the following park priorities:

- Ability to enhance visitor experience;
- Interpretive programs to highlight night sky resources; and
- Nighttime setting in the parks as experienced by hikers, campers, and stargazers.

Both Lassen and Whiskeytown are great places to learn about and enjoy the dark night sky. Stargazing events are the most popular ranger-led activity at Lassen, and the significance of preserving the night sky is further demonstrated in the park's annual Dark Skies Festival that attracts thousands of visitors, scientists, and partners. An NPS viewshed analysis indicates that this project will be visible from Lassen Peak. The current Hatchet Ridge Wind project is directly visible from Lassen Peak and from several locations within Whiskeytown. Previously measured night sky conditions ranked Lassen Peak as one of the darkest locations in the national park service.

The biggest threat to dark night skies is artificial lighting from nearby developments. Flashing red lights at the Hatchet Ridge Wind Project have caused some impacts to the night sky viewing experience at both Lassen and Whiskeytown, and we are concerned that the proposed Fountain Wind Project could introduce more impacts with the addition of artificial lights. We understand the requirement for safety lights to be included as required by the Federal Aviation Administration and look forward to working with you to explore mutually satisfactory measures that can help reduce impacts.

Recommendations:

The NPS recommends the use of an Aircraft Detection Lighting system (ADLS) as allowed by current FAA guidelines which will be important for reducing artificial light impacts to the night sky and nocturnal wildlife. To fully anticipate potential changes to the nighttime scene the NPS requests a lighting management plan be developed. Furthermore, given that the permanent turbine lighting, temporary construction lighting and associated facility lighting would have night sky effects, the NPS requests that the lighting management plan follow the NPS Sustainable Lighting Guidelines to minimize impacts. For prescriptive design of facility lighting we recommend the use of IES RP-43-22 Lighting Zone 1 Low. Lighting Zone 1 Low recommendations are in keeping with NPS guidance and are appropriate given natural levels of ambient light of the project area.

Sincerely,

Jim Richardson
Superintendent
Lassen Volcanic National Park
Lavo_superintendent@nps.gov
(530) 595-6101

Josh Hoines
Superintendent
Whiskeytown National Recreation Area
whis_superintendent@nps.gov
(530) 242-3460

Cc: Leonidas Payne, CEC Project Manager, STEPsiting@energy.ca.gov

Attachments: (3)