

| <b>DOCKETED</b>         |                                    |
|-------------------------|------------------------------------|
| <b>Docket Number:</b>   | 23-OPT-01                          |
| <b>Project Title:</b>   | Fountain Wind Project              |
| <b>TN #:</b>            | 259483                             |
| <b>Document Title:</b>  | Letter of Support from New Forests |
| <b>Description:</b>     | N/A                                |
| <b>Filer:</b>           | Marichka Haws                      |
| <b>Organization:</b>    | California Energy Commission       |
| <b>Submitter Role:</b>  | Commission Staff                   |
| <b>Submission Date:</b> | 10/8/2024 11:18:07 AM              |
| <b>Docketed Date:</b>   | 10/8/2024                          |

# Fountain Wind Project

Docket 23-OPT-1



California Energy Commission  
715 P Street  
Sacramento, CA 95814 USA

7 October 2024

Dear Commissioner Noemí Gallardo,

I'm writing to you on behalf of New Forests regarding the Fountain Wind Project. New Forests manages a global portfolio of nature-based real assets on behalf of our clients, including the owners of the underlying timberland property of the Fountain Wind Project.

As the manager of over 450,000 acres of timberland in California, I want to reiterate our firm belief that – based on the wildfire analyses submitted with this project in the public record and especially the analysis presented by fire risk, protection, and prevention experts in TN# 256430 and TN# 253505 – this project represents *a significant improvement in wildfire safety* to both the timber assets that we manage, surrounding forestlands, and surrounding communities.

It is New Forests' priority to manage timberlands with a focus on the long-term benefits of sustainable timber production, carbon sequestration, and nature positive investments. We seek to ensure a combination of ongoing timber supply and climate mitigation through the active management and practices of climate-smart forestry. Our approach includes diversified and multiple-use management strategies to generate combined economic, environmental, and social benefits through responsible forest management.

As a timberland manager, we have deep appreciation for the risks associated with catastrophic wildfires and other disturbances that are increasing in severity and frequency due to anthropogenic climate change caused in part by burning fossil fuels. If a wildfire were to happen in this area, it would be a material risk to our timber assets. We have every incentive to ensure that the Fountain Wind Project does not increase fire risk or pose any hindrance to effective firefighting. Based on our experience managing timberlands, and the supporting evidence in the public record of this case, ***we strongly believe that the Fountain Wind Project provides dual benefits of improving fire safety in this area while simultaneously expanding the diverse clean and renewable energy resource base necessary to address the climate crisis.***

Since we started managing the land on which the Fountain Wind Project is proposed, we have invested in shaded fuel breaks and local water resources throughout the area to mitigate the risk of catastrophic wildfire. The clearing of up to 500 acres of mostly young pine stands, as well as the implementation of up to 687 acres of shaded fuel breaks associated with the Fountain Wind Project are additive to the efforts we have undertaken and, as the evidence shows, reduces fire risk. For example, we encourage you to review the science and the conclusions that are presented in Fountain Wind's Fire Behavior Assessment, TN# 253505, where you will see that the predicted *rate of fire spread is reduced by ten times* after the wildfire mitigation activities associated with the project are complete.

As you may know, timberland owners are most often not able to obtain fire casualty loss insurance due to the high cost of premiums. **If we believed that this project represented an increase fire risk, then we would not be supporting it.**

We hope that you consider this letter along with the input of the fire experts with many decades of direct wildland fire experience when you make your decision on the project. Thank you for your leadership, hard work, and commitment to a sustainable future for all of California's people, communities, and ecosystems.

Sincerely,

A handwritten signature in black ink, appearing to read "J.D. Marshall".

J.D. Marshall, Director  
New Forests, Inc.