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Memo

То:	Lon Payne	From:	Caitlin Barns
	California Energy Commission		Stantec Environmental Consulting, Inc.
Project/File:	Fountain Wind Project (23-OPT-01)	Date:	January 10, 2025

Reference: Forestry Resources for the Fountain Wind Project

As noted in the project's application materials and in Shasta County's 2021 Environmental Impact Report (EIR), the Project's impact on "forest lands" ¹ as an environmental resource pursuant to the California Environmental Quality Act (CEQA) is **less than significant.**

In making an assessment of the significance of a project's impacts on forest lands, CEQA Guidelines' Appendix G recommends that lead agencies refer to the Forest Range Assessment Project in determining whether impacts to forest resources, including timberland, are significant environmental effects. In California, the Forest Range Assessment Project is administered by the Pacific Northwest Research Station. The USFS Forest Inventory and Analysis program hosts these data on <u>a web viewer</u>.

According to <u>these data</u> from the last assessment in 2021, there are 31.5 million acres of forestland in California, and 1.87 million acres of forest land in Shasta County. The Project plans to temporarily remove approximately 510 acres of commercial timberland from harvesting operations for the life of the Project (approximately 30 years). As a result, the Project would convert 0.0016 percent of forest land in California and 0.027 percent of forestland in Shasta County to non-forest use. This conversion of forestland associated with the Project is negligible and there is no basis to conclude this temporary loss of land available for commercial tree harvesting would have a significant environmental impact.

This temporary loss is also within the fluctuations of tree cover already experienced in Shasta County. Global Forest Watch maintains an online mapping tool and database to track changes in global forest cover over time using publicly available datasets. The <u>online dashboard</u> includes data on land use, tree cover, forest gains and losses, and fire-related forest losses between 2000 and 2023 for Shasta County. According to these data, as of 2023, Shasta County had 1.6 million acres of forestland (defined as tree cover with greater than 30 percent canopy density) extending over more than 60 percent of its land area. From 2001 to 2020, the County lost 172 kilo-hectares (kha; 425,021 acres) of tree cover, of which 118 kha (291,584 acres or 68 percent) were losses associated with wildfires. These data show that fluctuations in tree cover are typical for Shasta County, which is the largest timber-producing county in California, a municipality whose economy is heavily based on the forestry industry. The temporary removal of approximately 500 acres of tree cover associated with the Project is well within the typical annual tree cover fluctuation for the region.

¹ FIA Forest land: Forest land has at least 10 percent canopy cover of trees of any size, or has had at least 10 percent canopy cover of trees in the past, based on the presence of stumps, snags, or other evidence, and that will be naturally or artificially regenerated. Additionally, the land is not subject to nonforest use(s) that prevent normal tree regeneration and succession, such as regular mowing, intensive grazing, or recreation activities. Forest land includes transition zones, such as areas between heavily forested and nonforested lands that are at least 10 percent canopy cover with trees and forest areas adjacent to urban and built-up lands. Also included are pinyon-juniper and chaparral areas in the West and afforested areas. The minimum area for classification of forest land is 1 acre in size and 120 feet wide measured stem-to-stem from the outermost edge. Unimproved roads and trails, streams, and clearings in forest areas are classified as forest if less than 120 feet wide. This is the domestic reporting definition which is different from the definition used in international reporting (which includes a minimum tree canopy height criteria).

Reference: Forestry Resources: Fountain Wind Project

Shasta County's own 2021 EIR for this Project states:

"Of the 2,428,000 total acres that comprise Shasta County (Shasta County, 2004), 59 percent or 1,454,6800 acres are dedicated to commercial forest uses (Shasta County Planning Division, 2020). Removal of up to 713 acres of forest lands would result in a reduction of less than 0.05 percent of the commercial forest lands in Shasta County. Additionally, the timber harvest within the Project Site would overlap five active or completed THPs, which could result in fewer acres of conversion by the Project than projected for purposes of this analysis (ConnectGen, 2019). Given the Project's minimal contribution to net forest loss during and after construction of the Project, the impact would be less than significant. No mitigation is required."

In addition, industrial timberland has a significantly lower environmental value than pristine forestland that is not subject to continuous commercial timber operations. The Project would be located on lands recognized by the State of California in a 2017 Forest Assessment to be "industrial timberlands" appropriate for wind energy development. In <u>California's Forests and Rangelands Assessment (2017)</u> (see p. 272), the California Department of Forestry and Fire Protection recognized the need for expansion of the state's wind energy resources to combat climate change and cited construction of the Hatchet Ridge Wind Project on land immediately adjacent to the Project as a positive development, describing the project as being built on "industrial timberland."

"Large scale wind farms currently exist on about 27,000 acres of leased BLM lands. There are also numerous testing sites on BLM lands that could be developed in the future in Lassen, Lake, Kern, San Bernardino, and Imperial counties. In California, wind farms have also been developed on state-owned lands, tribal lands, city-owned lands, private farms and ranches, **and even on industrial timberland**. On private lands, the Union of Concerned Scientists estimates that landowners with good wind resources can increase the economic yield of their land by 30-100%, while continuing current ranch or farm operations."

The acres to be developed by the Project are already subject to removal for commercial timber harvesting. The Project site is under active commercial timber harvesting, and therefore timber is continuously harvested from it. Harvesting would take place at rates greater than or equal to the amount proposed to be harvested as part of the Project whether or not the Project is approved. Ultimately, over the next thirty years, the Project site will experience the removal and regrowth of harvestable timber at more or less the same rate, regardless of whether the Project is ever built.

The Project's effects on forest lands would be temporary, and upon Project

decommissioning, timber harvesting operations could resume. The loss of a negligible number of acres of harvestable timberland due to the project would not be permanent. According to the USFS' Forest Inventory and Analysis (2019), the age range of harvestable timber in California is 49-62 years. Under this assumption, Project infrastructure would impact timber production on affected acres only as long as a single generation of timber. At the end of its useful life, aboveground Project infrastructure would be decommissioned and the land restored to its prior condition. At that time, industrial timber operations could recommence.