

| <b>DOCKETED</b>         |   |
|-------------------------|---|
| <b>Docket Number:</b>   | 23-OPT-01   |
| <b>Project Title:</b>   | Fountain Wind Project   |
| <b>TN #:</b>            | 263374  |
| <b>Document Title:</b>  | Defenders of Wildlife Comments - Support the CEC Staff Assessment to Deny the Fountain Wind Project |
| <b>Description:</b>     | N/A   |
| <b>Filer:</b>           | System  |
| <b>Organization:</b>    | Defenders of Wildlife   |
| <b>Submitter Role:</b>  | Public  |
| <b>Submission Date:</b> | 5/27/2025 12:06:50 PM   |
| <b>Docketed Date:</b>   | 5/27/2025   |

*Comment Received From: Defenders of Wildlife  
Submitted On: 5/27/2025  
Docket Number: 23-OPT-01*

**Support the CEC Staff Assessment to Deny the Fountain Wind Project**

*Additional submitted attachment is included below.*



**California Program Office**

P.O. Box 401, Folsom, California ,325763

[www.defenders.org](http://www.defenders.org)

May 27, 2025

Kaycee Chang  
California Energy Commission  
715 P Street  
Sacramento, CA 95814

Re: Fountain Wind Project; Docket No. 23-OPT-01

Dear Ms. Chang,

Thank you for the opportunity to provide comments in response to the Draft Environmental Impact Report (DEIR; also referred to as the Staff Assessment or SA) for the proposed Fountain Wind Project (Project). Defenders of Wildlife (Defenders) is dedicated to protecting all wild animals and plants in their natural communities and has nearly 2.1 million members and supporters in the United States, with more than 311,000 residing in California.

Defenders strongly supports renewable energy generation. As we transition toward a clean energy future, it is imperative that we strike a balance between the need for renewable energy to mitigate the impacts of climate change and the impact of energy development on biological resources. Renewable energy projects must be planned, sited, developed and operated to avoid, minimize and mitigate adverse impacts on wildlife and lands with known high-resource values. The proposed Fountain Wind Project is not thoughtfully sited, as it would result in significant and unavoidable impacts to biological resources. Located in a high fire hazard severity zone, the project's infrastructure has the potential to create significant and unavoidable impacts on the site and the adjacent National Forest Lands should the Project ignite a fire. Furthermore, the Project presents serious risks to avian and bat populations, including special-status species, due to the potential for collision with turbine blades.

Defenders understand the Project would also create significant and unavoidable impacts on cultural and tribal resources, as well as the site itself, which has been identified as a tribal cultural landscape. Defenders stands in solidarity with the Pit River Tribe and we strongly urge the California Energy Commission (CEC) to carefully review the Tribal Cultural Resources section of the DEIR/SA, as well as the comments submitted by the Pit River Tribe.

As such, Defenders concurs with the CEC's recommendation within the SA to deny the Fountain Wind Project. We agree with the Staff's position that the Project is not necessary for public convenience and the benefits do not outweigh its unavoidable environmental

impacts. The Project lacks merit due to the significant and unavoidable biological and tribal impacts and is not entitled to certification. Moreover, the applicant has failed to demonstrate that the Project can be constructed and operated without violating applicable laws, ordinances, regulations and standards. Specifically, the Project conflicts with Shasta County's zoning laws, which prohibit the construction and operation of large-scale wind projects in the project location. Defenders requests that the CEC adhere to the Staff Recommendation and deny certification of the Fountain Wind Project.

Thank you once again for the opportunity to provide comments on the Fountain Wind Project DEIR/SA. Please feel free to contact me with any questions.

Respectfully submitted,

*Sophia Markowska*

Sophia Markowska  
Senior California Representative  
Defenders of Wildlife  
[Smarkowska@defenders.org](mailto:Smarkowska@defenders.org)