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New Forests comments on CEC SA & EIR

Additional submitted attachment is included below.

New Forests' Comments on Staff Assessment and Environmental Impact Report (TN 262350)

Fountain Wind Project (23-OPT-01)



California Energy Commission
715 P Street, Sacramento, CA 95814 USA

27 May 2025

Dear Commissioners,

Thank you for the opportunity to provide input to the California Energy Commission ("Commission") on the Fountain Wind Project ("Project") (23-OPT-01). Please find below New Forests' response to the Staff Assessment ("SA") and Draft Environmental Impact Report ("EIR") (TN 262350), including information material to the Project.

New Forests manages a global portfolio of nature-based real assets on behalf of investors and clients, including the owners of the timberland property underlying the Project. Our priority is managing timberlands with a focus on the long-term benefits of sustainable timber production, carbon sequestration, and positive impact on local communities. We believe the Project contributes to the Commission's mission to transition California towards a 100% clean energy future while simultaneously benefiting the local economy. Importantly, we affirm the Project is consistent with best practice in sustainable forest management.

Commission's SA and EIR conclude that the Project will significantly increase wildfire risk and impact regional lumber supply while also proposing a battery energy storage system ("BESS") as an appropriate alternative. New Forests has concerns about the veracity of these assertions. First, we note that the SA and EIR leans heavily on the Records of Conversation ("ROCs") with Chief Sean O'Hara and Staff Chief Jake Sjolund with less recognition of CALFIRE's 24 October 2024 letter from the more senior Regional Chief George Morris, III (TN 259802), which affirms less than half of the ROC responses are official CALFIRE positions. CALFIRE affirms responses related to general policies and firefighting capacity but concludes site specific analyses and opinions about fire hazard *are not official CALFIRE positions*.

As the manager of over 450,000 acres of timberland in California, New Forests wants to reiterate our firm belief that this project represents *a significant improvement in wildfire safety* to both the timber assets that we manage, surrounding forestlands, and surrounding communities. We base these conclusions on the wildfire analyses submitted with this Project and in the public record, as detailed in our prior letter on 8 October 2024 (TN 259483). We believe the Project provides dual benefits of improving fire safety in the area while expanding the diverse clean and renewable energy resource base necessary to address climate change.

Commission's SA and EIR further conclude that the Project will significantly impact California's lumber supply. New Forests strategic plans, however, forecast continued supply of sustainable forest products to local markets. The adjacent wind operation on Hatchet Ridge provides evidence that local wind projects have little to no impact on aggregate forested resources and regional supplies. If the Project is approved, it will provide clean and renewable resources alongside our working forests that produce sustainable and renewable timber.

New Forests is surprised that Commission's SA proposes BESS as an alternative to the Project with limited in-depth analyses of site-specific wildfire risks. New Forests' experiences, and those of other forest managers in the region, highlight the substantial co-benefits that wind projects provide to forested working lands and local communities. We manage other forests operating with large-scale wind projects without issue. A comparable wind project, operating without incident over the last fifteen years, sits just a few miles from the proposed Project site.

AB 205 and the Opt-In Program provide the Commission authority to lead California into a sustainable and clean energy future. Provided the above, New Forests recommends Commissioners approve the 205-megawatt Project.

Sincerely,

Matt Zenick

Matt Zenick, Associate Director of Operations, New Forests, Inc.