

DOCKETED	
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Project/File: Fountain Wind Project

Date: May 2, 2023

Reference: Data Responses – VIA Key Observation Points

As a response to feedback provided by the CEC in the deficiency letter dated February 10, 2023, the Fountain Wind Project Application team would like to provide additional information on the materials related to the Visual Resources Technical Report produced for the Project. The technical report relied on a set of representative Key Observation Points (KOPs) to discuss the Project's visual effects, which informed development of the Draft Environmental Impact Review (DEIR) aesthetics analysis.

Below please find a brief summary of these CEC comments, by KOP, with the Project Applicant **Proposed Action** included to guide the CEC's decision-making process. This information has been summarized in the larger data response table provided to CEC on May 2, 2023, as part of responses to Deficiency Notice Comments VIS-01, VIS-05, VIS-08, and VIS-09. As in the data response, references are made below to the following images and figures, which have also been submitted to CEC via Kiteworks: updated viewshed figures; high-resolution JPEG images of existing simulations; and figures showing the comparative effects between the Project as proposed in the DEIR and as revised and submitted to the Shasta County Board of Supervisors on 9/13/21 ("9/13/21 BOS Fig 6").

The seven KOPs included in the technical report and incorporated into the EIR provide the vehicle by which existing and proposed conditions are representatively discussed in the technical report and EIR. These viewpoints were identified and selected based on prior coordination with Shasta County, the lead agency in performing a CEQA review for the Project. Per the 4/13/2023 discussion between the CEC and the Applicant team, this memorandum proposes the following changes to be made.

KOP 1: Fountain Fire Overlook

We agree that removal of the string or turbines west of the Fountain Fire Overlook from the Project as currently proposed eliminates the need for this viewpoint.

- **Proposed Action: Eliminate KOP.**
- *Reference document: 9/13/21 BOS Fig 6-1*

KOP 2: Montgomery Creek

We agree with CEC that the view from KOP 2 should capture the greatest portion of the Project as currently proposed. The current view orientation does that. Turbines further to the south, to the right of the existing view, would be no more than partially visible beyond the ridgeline that appears along the back of the view.

Reference: Data Responses - VIA

They would be partially obscured by the identifiable tree line and be further away than the turbines shown in the existing simulated view.

- **Proposed Action: Retain KOP.**
- *Reference documents: 9/13/21 BOS Figs 6-2C and 6-2D; KOP 2 high-resolution JPEG*

KOP 3: Round Mountain

We agree with CEC that the view from KOP 3 should capture the greatest portion of the Project as currently proposed. Turbines further to the east-southeast of this KOP, appearing generally at the same distance as those visible near the left of edge of the view, would be visible in a view adjusted in that direction. A single-frame image cannot show the entire span of these more proximate turbines.

- **Proposed Action: Supplement KOP (KOP 3a / KOP 3b).** A second simulation for this KOP will be produced for the view to the east-southeast, to the right of the existing view.
- *Reference documents: 9/13/21 BOS Figs 6-3C and 6-3D; KOP 3 high-resolution JPEG*

KOP 4: SR 299 at Tamarack Road

We acknowledge that segments of SR 299 closer to the Project than the current KOP 4 afford line-of-sight visibility to proposed turbines. These areas were eliminated from previous discussions of representative viewpoints due to the short duration of views, a function of moderately forested roadway corridors and presumed highway traveling speeds.

- **Proposed Action: Replace KOP 4.** Current viewshed analysis information identifies a stretch of roadway near the Hatchet Ridge Wind Farm entrance where there would likely be visibility of Project turbines. New / expanded roadway corridors may be identifiable in this view.
- *Reference documents: 10-Mile Radius Viewsheds for Blade Tip and Hub*

KOP 5: Burney

The view from KOP 5 includes numerous intervening trees and foreground structures that either obscure or distract from the partial visibility of Project turbines demonstrated by the simulated view from the same location. The town of Burney is moderately to heavily forested in its downtown and in areas along / south of SR 299. CEC stated that the KOP should be located within the residential areas outside the downtown area, where views are less obstructed. The northern segment of the town consists mainly of rural residences and small ranches. Forested or other vegetated areas would still obstruct most views to the southwest. Where absence of forested areas would allow for unobstructed line-of-sight toward the proposed Project, views would appear to represent private, individual residences or otherwise less developed conditions than the community center / gathering place views this KOP was selected to represent.

- **Proposed Action: Retain KOP.**
- *Reference documents: 10-Mile Radius Viewsheds for Blade Tip and Hub*

Reference: Data Responses - VIA

KOP 6: SR 299 – Pit River Overlook

We acknowledge that turbines are difficult to observe in compressed images of simulated views 19 miles away.

- **Proposed Action: Retain KOP.**
- *Reference documents: KOP 6 high-resolution JPEG*

KOP 7: Redding

We acknowledge that turbines are difficult to observe in compressed images of simulated views 28 miles away.

- **Proposed Action: Retain KOP.**
- *Reference documents: KOP 7 high-resolution JPEG*

Simulations Demonstrating Visual Effects from Access Road Widening and Potential Night Lighting

With the exception of the two access points along SR 299, road widening required by the project would likely be limited to areas generally within the project footprint and likely not prominently visible from SR 299 or other publicly accessible points due to obstruction from roadside vegetation.

Lighting required for the Project will be determined by the Federal Aviation Administration (FAA), a step typically initiated once a project has been entitled. Safety lighting required by FAA has yet to be determined for the Project. As agreed on 4/13/23 the Project Applicant will provide the CEC with a reasonable timeline for when the CEC would receive final plans.

Thank you,

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