

**DOCKETED**

<b>Docket Number:</b>	23-OPT-01
<b>Project Title:</b>	Fountain Wind Project
<b>TN #:</b>	250741
<b>Document Title:</b>	Cultural_Responses_Fountain_Wind
<b>Description:</b>	N/A
<b>Filer:</b>	Caitlin Barns
<b>Organization:</b>	Stantec Consulting Services, Inc.
<b>Submitter Role:</b>	Applicant Consultant
<b>Submission Date:</b>	6/26/2023 2:28:29 PM
<b>Docketed Date:</b>	6/26/2023



**Reference: Cultural Responses to CEC Data Request**

Resources Evaluation Report (HRER) (“fwp\_rpt\_hrer\_submittal\_final\_compiled”). Updated records search, DPRs, and reports are provided (filenames with “NEIC” and “DPR”). Regarding efforts to identify any cultural resources listed or recognized by a city, county, or local historical and archaeological societies or museums, Shasta County does not maintain a historic register nor do the communities on Round Mountain and Burney. An electronic search of the online database of the Shasta Historical Society did not identify any relevant resources.

## **DATA REQUEST CUL-004**

- Provide Figure 4 (Survey Coverage Map) under confidential designation so that the boundaries of the archaeological survey are verifiable (no less than 200’ around the project site, substations and staging areas, and to no less than 50’ to either side of the right-of-way of project linear facility routes).
- Conduct a historic architecture field survey inclusive of the project site and the project linear facility routes, extending no less than .5 mile out from the proposed plant site and from the routes of all above-ground linear facilities. A Secretary of the Interior-qualified historian or architectural historian shall conduct or oversee this survey.
- The following information is needed for the cultural resources inventory report to meet the Archaeological Resource Management Report (ARMR) guidelines:
- Title Page needs the name of topographic maps, keywords (trinomials, primary numbers, or other resource numbers, or page numbers where listed; township and range of project). See ARMR, pp. 5–6.
- Executive Summary: Address significance evaluations of identified resources; address impacts and recommendations; disclose disposition of any field notes, collections, or reports. See ARMR, p. 6.
- Project Information/Introduction: Add location map and other figures that were left out of the report; add schedule for construction of the project; add statements of qualification for other personnel. See ARMR, pp. 6–7.
- Research Design: Add a research design that informs the significance evaluations of identified cultural resources; this is wholly absent from project documentation. See ARMR, pp. 9–10.
- Methods: Provide a discussion of the research conducted to evaluate resource significance (the report is silent on this matter, other than reporting the records search and reviewing some historic maps). Disclose disposition of any field notes, collections, or reports. See ARMR, pp. 10– 11.
- Report of Findings (Results): Sketch maps are needed for the following DPR 523 form sets: FW-12, FW-13, FOU0919-2-14, FOU0923-1-2, and FOU1015. See ARMR, p. 12.
- Discussion/Interpretation and Management Considerations (Conclusions): Add discussion that references research design. See ARMR, pp. 15–19.
- References Cited: Include bibliographic entries for all historic maps consulted.

**Reference: Cultural Responses to CEC Data Request**

- Please provide a copy of the currently missing Stantec, 2020a. Addendum 1: Update to The Fountain Wind Energy Project Cultural Resources Phase 1 Inventory of 4,463 Acres, Shasta County, California. Prepared for Fountain Wind LLC. March 18, 2020. This will need to be reviewed for adequacy when provided.

**DATA RESPONSE CUL-004**

Survey coverage maps can be found as Figure 6 in the updated Cultural Resources Phase I Inventory of 4,463 Acres, Shasta County, California, dated December 6, 2019, revised May 19, 2023, revised May 19, 2023) (“rpt\_ftnwind\_cul\_resources\_jun2023\_compiled\_Part1” through “\_Part4”). Per CEC’s request, the Applicant has undertaken a historic architectural field survey and prepared an Historical Resources Evaluation Report (HRER) discussing methods, findings and evaluations (“fwp\_rpt\_hrer\_submittal\_final\_compiled”). Per CEC’s request, the Applicant also updated the original cultural report (*Cultural Resources Phase 1 Inventory of 4,463 Acres, Shasta County, California*, dated December 6, 2019, revised May 19, 2023 according to the CEC’s ARMOR format requests, resulting in updates to the title page, executive summary, research design, methods, and sketch maps.

**[DATA REQUEST CUL-005 WAS DEEMED ADEQUATE.]**

**DATA REQUEST CUL-006**

Provide revised summary of literature search results from Appendix B(g)(2)(B).

**DATA RESPONSE CUL-006**

See Section 7.0, Results and Discussion in the updated Cultural Resources Phase I Inventory of 4,463 Acres, Shasta County, California, dated December 6, 2019, revised May 19, 2023 (“rpt\_ftnwind\_cul\_resources\_jun2023\_compiled\_Part1” through “\_Part4”).

**DATA REQUEST CUL-007**

Provide a revised discussion of survey procedures, methods used to identify and evaluate cultural resources, and CEQA implications, incorporating information from the historic architecture survey and other edits to the cultural resources phase 1 inventory report. This discussion must include a version that excludes confidential cultural resources information to facilitate responsible public disclosure.

**DATA RESPONSE CUL-007**

See Section 6.0 Methods in the updated Cultural Resources Phase I Inventory of 4,463 Acres, Shasta County, California, dated December 6, 2019, revised May 19, 2023 (“rpt\_ftnwind\_cul\_resources\_jun2023\_compiled\_Part1” through “\_Part4”).

**Reference:** Cultural Responses to CEC Data Request

## **DATA REQUEST CUL-008**

Provide copies of all new and updated DPR 523 forms per this requirement; these copies must include any DPR 523 forms completed as part of the historic built environment survey required under Appendix B(g)(2)(C).

## **DATA RESPONSE CUL-008**

New and updated DPR forms are provided (filenames with “DPR” and “fwp\_updated\_records\_search\_Resource list\_compressed”).

## **DATA REQUEST CUL-010**

Please provide missing resumes in TN248291- 5\_20230103T125603 Cultural Report Author Qualifications, inclusive of a Secretary of the Interior-qualified architectural historian responsible for completing the missing architectural/built environment survey. The application is missing resumes for Dylan Stapleton Leven Kraushaar, Rudy Dinarte, Joshua Taylor, Brandy Doering, Georganne McMaster, Nathan Jereb, Spencer Frye, John Nadolski, and Joshua Peabody.

## **DATA RESPONSE CUL-010**

Requested resumes are provided (“fwp\_resumes\_compiled”).

## **DATA REQUEST CUL-011**

Please provide the original NAHC Sacred Lands File request letter.

## **DATA RESPONSE CUL-011**

NAHC request forms, associated mapping, and request emails are provided (See “fwp\_Tribal\_Addendum” and “fwp\_2017\_2019\_NAHC req and response\_compressed”). Outreach is fully documented in *Addendum 2 Fountain Wind Energy Project -- Updated Cultural Resources Inventory Report--Tribal Coordination and Correspondence*.

## **DATA REQUEST CUL-012**

Please provide an updated discussion of proposed mitigation measures required by (g)(1), after an architectural/built environment survey (See also Appendix B (g) (2) (C)) has been prepared.

Please also provide an updated discussion that is suitable for public disclosure (only containing non-confidential cultural resources information).

**Reference:** Cultural Responses to CEC Data Request

## **DATA RESPONSE CUL-012**

No mitigation measures are proposed to mitigate impacts to historic built resources within the Study Area because the project would not result in any significant impacts to historic built resources. (See Section 8.0 of the HRER (“fwp\_rpt\_hrer\_submittal\_final\_compiled”). Two built historic resources exist within the Study Area: the Pit-Vaca Dixon No. 2 and Pit 1 Vaca-Dixon 230 kV Transmission Lines. The Project would directly impact one historical resource, the Pit-Vaca Dixon No. 2, as well as indirectly impact both historical resources within the Study Area; however, the Project would not result in a substantial adverse change to the integrity of either identified historical resources to the degree that they would no longer be eligible as historical resources pursuant to CEQA. Additionally, no related projects were identified based on publicly available information; therefore, the Project would not contribute to cumulative impacts to historical resources. As such, the Project would have a less than significant impact on historical resources. Therefore, no mitigation is required or recommended.

A redacted, publicly reviewable version of the cultural report is provided.

## **DATA REQUEST CUL-013 AND CUL-014**

Please provide updated mitigation measures proposed to mitigate project impacts to known cultural resources as necessary after an architectural/built environment survey (See also Appendix B (g) (2) (C)) has been prepared.

Please provide updated mitigation measures proposed to mitigate potential impacts to previously unknown cultural resources as necessary after an architectural/built environment survey (See also Appendix B (g) (2) (C)) has been prepared.

## **DATA RESPONSE CUL-013 AND CUL-014**

See response to CUL-012.

## **DATA REQUEST CUL2-01**

Please update the historic context, as presented in the Phase 1 cultural resources inventory report (Stantec 2019), to minimally include a discussion of the background history to provide for an understanding of various historic cultural resources and named historic features that are within no more than a 5-mile radius of the project location. The historic context shall discuss the role of California Native Americans in the project vicinity to reflect the high proportion of California Indians reported in the 1880 U.S. Census.

This update should take place following completion of an architectural/built environment survey and report by or under the direction of an NPS qualified Architectural Historian (See also Section Appendix B (g) (2) (C)).

## **DATA RESPONSE CUL2-01**

The revised Cultural Resources Phase I Inventory of 4,463 Acres, Shasta County, California, dated December 6, 2019, revised May 19, 2023 includes an updated historic context, including a discussion of the

**Reference: Cultural Responses to CEC Data Request**

role of California Native Americans in the vicinity (TN# ) in Section 5.1. The supplemental HRER includes a discussion of the history of the Hatchet Mountain area with a focus on built resources within 5 miles of the Project area (see Section 4.2 of the HRER ["fwp\_rpt\_hrer\_submittal\_final\_compiled"]).

## **DATA REQUEST CUL2-02**

This data request is made in addition to previously requested information in the Data Adequacy Worksheet. If Stantec staff determine that the original records search boundaries are inadequate, then Stantec shall conduct a new records search within an area not less than a 1-mile radius around the project site and not less than one-quarter (0.25) mile on each side of the linear facilities in accordance with CEC regulations, and provide all new documents, reports, and site records for review.

## **DATA RESPONSE CUL2-02**

See response to CUL-003.

## **DATA REQUEST CUL2-03:**

- If an architectural field survey has been conducted and a built environment cultural resources compliance report previously prepared in accordance with Appendix B guidelines, then please provide this report for review.
- If an architectural field survey has not been conducted and a built environment cultural resources compliance report not previously prepared, then please conduct a historic architecture field survey inclusive of the project site and the project linear facility routes, extending no less than .5 mile out from the proposed plant site and from the routes of all above-ground linear facilities. A Secretary of the Interior-qualified historian or architectural historian shall conduct or oversee this survey and shall be listed as the author of the report prepared.
- Please include State Route 299 in the built environment report. Confer with entities knowledgeable about the history of State Route 299, such as the California Department of Transportation and the Pit River Tribe (specifically Brandy McDaniels).
- This report should comply with ARMR guidelines per Siting Regulation Appendix B (g) (2) (C).
- It is further suggested that the report also be prepared in consideration of guidelines as outlined in Caltrans Volume 2 -Standard Environmental Reference, Chapter 6; Built Environment Cultural Resources Evaluation and Treatment, 2019 Update rev: 07/15/20 built environment features. Please evaluate all highways, roads, and trails in consideration of A Historical Context and Methodology for Evaluating Trails, Roads, and Highways in California, prepared by Caltrans, Sacramento, 2016.
- The applicant may choose to combine the historic built environment inventory report with the Phase 1 cultural resources report and addenda for convenience of use by others and to ensure a comprehensive treatment of all types of cultural resources in the project area.

**Reference:** Cultural Responses to CEC Data Request

### **DATA RESPONSE CUL3-03**

Per CEC's request, an HRER was prepared by an SOIS-qualified architectural historian ("fwp\_rpt\_hrer\_submittal\_final\_compiled"). The Study Area is defined in Section 3.1 of the HRER. It encompasses the Project Site plus a radius of 0.5-miles from proposed wind turbines and aboveground collector lines. The only historic built resources newly identified within the Study Area during the field inspection were roads, specifically SR 299 and logging roads. Built resources not surveyed as part of the field inspection included additional logging roads less than 45 years old. There were no other built resources identified within the Study Area that were more than 45 years old and had the potential to be impacted by the Project. Both SR 299 and logging roads more than 45 years old were evaluated for the National Register of Historic Places and California Register of Historical Resources using the established national and state criteria (see Section 5.1 of the report). The HRER conforms to professional standards and guidelines for architectural history.

### **DATA REQUEST CUL2-04**

Please Provide revised summary of literature search results from Appendix B(g)(2)(B).

### **DATA RESPONSE CUL2-04**

See Section 7.1 in the updated Cultural Resources Phase I Inventory of 4,463 Acres, Shasta County, California, dated December 6, 2019, revised May 19, 2023 ("rpt\_ftnwind\_cul\_resources\_jun2023\_compiled\_Part1" through "\_Part4").

### **DATA REQUEST CUL2-05**

Please provide a revised discussion of survey procedures, methods used to identify and evaluate cultural resources, and CEQA implications, incorporating information from the historic architecture survey. This discussion must include a version that excludes confidential cultural resources information to facilitate responsible public disclosure.

### **DATA RESPONSE CUL2-05**

See Section 3.0 of the HRER ("fwp\_rpt\_hrer\_submittal\_final\_compiled").

### **DATA REQUEST CUL2-06**

Please revise the report citation on all newly recorded sites to reflect the appropriate report and Please provide copies of all new DPR 523 forms completed as part of the historic built environment survey required under Appendix B(g)(2)(C).

### **DATA RESPONSE CUL2-06**

See Section 5.0 and Appendix A of the HRER ("fwp\_rpt\_hrer\_submittal\_final\_compiled").



**Reference:** Cultural Responses to CEC Data Request

## **DATA REQUEST CUL2-07**

Please provide a map at a scale of 1:24,000 U.S. Geological Survey quadrangle depicting the locations of all previously known and newly identified cultural resources compiled through the research required by Appendix B (g)(2)(B) and Appendix B (g)(2)(C) (ii).

Please provide resumes of all personnel involved in the Phase 1 Inventory and any other addenda or reports in TN248291-5\_20230103T125603 Cultural Report Author Qualifications, inclusive of a Secretary of the Interior-qualified architectural historian responsible for completing the missing architectural/built environment literature review and survey in accordance with Appendix B (g) (2) (C) (v).

## **DATA RESPONSE CUL2-07**

See responses to CUL-009 and CUL-010.

## **DATA REQUEST CUL2-08**

If the requested architectural/built environment survey will require valid permits to conduct the survey (i.e. Forest Service permits), please update the Phase 1 Inventory report to include information indicating when permits outside the authority of the commission will be obtained and the steps the applicant has taken or plans to take to obtain such permits.

## **DATA RESPONSE CUL2-08**

No permits are needed to conduct built environment surveys on private land. The survey area consisted entirely of private land.

## **DATA REQUEST CUL2-09**

Revise the cultural report to include the location(s) of all ground disturbing activity proposed as part of the project and the depth of each identified disturbance including grading and proposed realignment of any identified access roads.

## **DATA RESPONSE CUL2-09**

The updated Cultural Resources Phase I Inventory of 4,463 Acres, Shasta County, California, dated December 6, 2019, revised May 19, 2023 ("rpt\_ftnwind\_cul\_resources\_jun2023\_compiled\_Part1" through "\_Part4" ) contains a discussion of the location of ground-disturbing activity (Figure 4), the depth of disturbance (Table 1), and the proposed widening of access roads.

Data Request	Request Source	Topic	Reviewer	Siting Regulations	Information	Opt-In Page Number And Section Number	Original Determination of Adequacy	Information Required To Make OPT Conform With Regulations	Response Date	Applicant Response No. 1	Status
CUL-001	Deficiency Letter Matrix	Cultural Resources	DeOliveira Hatheway Roark	Appendix B (g) (1)	...provide a discussion of the existing site conditions, the expected direct, indirect and cumulative impacts due to the construction, operation and maintenance of the project, the measures proposed to mitigate adverse environmental impacts of the project, the effectiveness of the proposed measures, and any monitoring plans proposed to verify the effectiveness of the mitigation.		Yes	N/A	N/A	N/A	N/A
CUL-002	Deficiency Letter Matrix	Cultural Resources	DeOliveira Hatheway Roark	Appendix B (g) (2) (A)	A summary of the ethnology, prehistory, and history of the region with emphasis on the area within no more than a 5-mile radius of the project location.		Yes	N/A	N/A	N/A	N/A

Data Request	Request Source	Topic	Reviewer	Siting Regulations	Information	Opt-In Page Number And Section Number	Original Determination of Adequacy	Information Required To Make OPT Conform With Regulations	Response Date	Applicant Response No. 1	Status
CUL-003	Deficiency Letter Matrix	Cultural Resources	DeOliveira Hatheway Roark	Appendix B (g) (2) (B)	<p>The results of a literature search to identify cultural resources within an area not less than a 1-mile radius around the project site and not less than one-quarter (0.25) mile on each side of the linear facilities. Identify any cultural resources listed pursuant to ordinance by a city or county or recognized by any local historical or archaeological society or museum. Literature searches to identify the above cultural resources must be completed by, or under the direction of, individuals who meet the Secretary of the Interior's Professional Standards for the technical area addressed. Copies of California Department of Parks and Recreation (DPR) 523 forms (Title 14 CCR section 4853) shall be provided for all cultural resources (ethnographic, architectural, historical, and archaeological) identified in the literature search as being 45 years or older or of exceptional importance as defined in the National Register Bulletin Guidelines, (36CFR60.4(g)). A copy of the USGS 7.5' quadrangle map of the literature search area delineating the areas of all past surveys and noting the California Historical Resources Information System (CHRIS) identifying number shall be provided. Copies also shall be provided of all technical reports whose survey coverage is wholly or partly within .25 mile of the area surveyed for the project under section (g)(2)(C), or which report on any archaeological excavations or architectural surveys within the literature search area.</p>	<p>Stantec Consulting Services (Stantec), 2019. Fountain Wind Energy Project Cultural Resources Phase 1 Inventory of 4,463 Acres, Shasta County, California. Prepared for Fountain Wind LLC. December 2019. Section 6.1 CHRIS Record Search Results, pp. 2, 15, 18, Appendix B DEIR, p. 3.6-6 Cultural Report Author Qualifications Confidential Appendix C: DPR Forms</p>	No	<p>Provide a copy of the Northeast Information Center request letter, USGS 7.5' quadrangle map of the literature search area delineating the areas of all past surveys and noting the CHRIS identifying number, and response letter. Describe efforts to identify any cultural resources listed or recognized by a city, county, or local historical and archaeological societies or museums. Provide copies of California Department of Parks and Recreation (DPR) 523 forms (Title 14 CCR section 4853) shall be provided for all cultural resources (ethnographic, architectural, historical, and archaeological) identified in the literature search. Provide copies of all technical reports whose survey coverage is wholly or partly within .25 mile of the area surveyed for the project. These reports are listed in Appendix B, Table 1, of the Administrative Draft of the Fountain Wind Energy Project Cultural Resources Phase 1 Inventory of 4,463 Acres docketed report. Provide copies of previous studies that report on any archaeological excavations or architectural surveys within the literature search area (1 mile buffer from project site).</p>		<p>A records search at the Northeast Information Center (NEIC) of the California Historic Resources Information System (CHRIS) was conducted by NEIC personnel on September 13, 2017 (NEIC File No. D17-150) to obtain and review previous cultural resource records, cultural resource studies, and any additional documentation pertaining to properties located within a 0.25-mile extent of the Survey Area. Full reports were requested as IC File #NE23-64. In addition, a supplemental record search of the Project Site and a 1-mile buffer was initiated on May 16, 2023. The results are discussed in the updated Cultural Resources Phase I Inventory Section 7.1 and Appendix B, Tables 1 and 2 ("rpt_ftnwind_cul_resources_jun2023_compiled_Part1" through "_Part4") and Section 3.3 of the Historical Resources Evaluation Report (HRER) ("fwp_rpt_hrer_submittal_final_compiled"). Updated records search, DPRs, and reports are provided (filenames with "NEIC" and "DPR"). Regarding efforts to identify any cultural resources listed or recognized by a city, county, or local historical and archaeological societies or museums, Shasta County does not maintain a historic register nor do the communities on Round Mountain and Burney. An electronic search of the online database of the Shasta Historical Society did not identify any relevant resources.</p>	submitted - awaiting CEC response

CUL-004	Deficiency Letter Matrix	Cultural Resources	Roark	Appendix B (g) (2) (C)	<p>The results of new surveys or surveys less than 5 years old shall be provided if survey records of the area potentially affected by the project are more than 5 years old. Surveys to identify new cultural resources must be completed by (or under the direction of) individuals who meet the Secretary of the Interior's Professional Standards for the technical area addressed. New pedestrian archaeological surveys shall be conducted inclusive of the project site and project linear facility routes, extending to no less than 200' around the project site, substations and staging areas, and to no less than 50' to either side of the right-of-way of project linear facility routes. New historic architecture field surveys in rural areas shall be conducted inclusive of the project site and the project linear facility routes, extending no less than .5 mile out from the proposed plant site and from the routes of all above-ground linear facilities. New historic architecture field surveys in urban and suburban areas shall be conducted inclusive of the project site, extending no less than one parcel's distance from all proposed plant site boundaries. New historic architecture field reconnaissance ("windshield survey") in urban and suburban areas shall be conducted along the routes of all linear facilities to identify, inventory, and characterize structures and districts that appear to be older than 45 years or that are exceptionally significant, whatever their age. A technical report of the results of the new surveys, conforming to the Archaeological Resource Management Report format (CA Office of Historic Preservation Feb 1990), which is incorporated by reference in its entirety, shall be separately provided and submitted (under confidential cover if archaeological site locations are included).</p> <p>Shasta County DEIR Cultural Resources: Table 3.6-1 Cultural Resources in the Area of Direct Impact</p> <p>Stantec Consulting Services (Stantec), 2019. Fountain Wind Energy Project Cultural Resources Phase 1 Inventory of 4,463 Acres, Shasta County, California. Prepared for Fountain Wind LLC. December 2019.</p> <p>Stantec, 2020a. Addendum 1: Update to The Fountain Wind Energy Project Cultural Resources Phase 1 Inventory of 4,463 Acres, Shasta County, California. Prepared for Fountain Wind LLC. March 18, 2020.</p> <p>Stantec, 2020b. Addendum 2: Updated Cultural Resources Inventory Report: Tribal Coordination and Correspondence. Prepared for Fountain Wind LLC. March 23, 2020.</p> <p>Cultural Report Author Qualifications</p> <p>20230111T150116_Confidential Cultural Survey Update.</p> <p>Confidential DPR Forms Pt1 20230111T150100_TN248291-6_20230103T125604_Figure - Sites Built Before 1977</p>	<p>No</p> <p>Provide Figure 4 (Survey Coverage Map) under confidential designation so that the boundaries of the archaeological survey are verifiable (no less than 200' around the project site, substations and staging areas, and to no less than 50' to either side of the right-of-way of project linear facility routes). Conduct a historic architecture field survey inclusive of the project site and the project linear facility routes, extending no less than .5 mile out from the proposed plant site and from the routes of all above-ground linear facilities. A Secretary of the Interior-qualified historian or architectural historian shall conduct or oversee this survey.</p> <p>The following information is needed for the cultural resources inventory report to meet the Archaeological Resource Management Report (ARMR) guidelines:  Title Page needs the name of topographic maps, keywords (trinomials, primary numbers, or other resource numbers, or page numbers where listed; township and range of project). See ARMR, pp. 5–6.  Executive Summary: Address significance evaluations of identified resources; address impacts and recommendations; disclose disposition of any field notes, collections, or reports. See ARMR, p. 6.  Project Information/Introduction: Add location map and other figures that were</p>	<p>Survey coverage maps can be found as Figure 6 in the updated Cultural Resources Phase I Inventory of 4,463 Acres, Shasta County, California, dated December 6, 2019, revised May 19, 2023, revised May 19, 2023) ("rpt_ftnwind_cul_resources_jun2023_compiled_Part1" through "_Part4"). Per CEC's request, the Applicant has undertaken a historic architectural field survey and prepared an Historical Resources Evaluation Report (HRER) discussing methods, findings and evaluations ("fwp_rpt_hrer_submittal_final_compiled"). Per CEC's request, the Applicant also updated the original cultural report (Cultural Resources Phase 1 Inventory of 4,463 Acres, Shasta County, California, dated December 6, 2019, revised May 19, 2023 according to the CEC's ARMR format requests, resulting in updates to the title page, executive summary, research design, methods, and sketch maps.</p>	<p>submitted - awaiting CEC response</p>
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left out of the report; add schedule for construction of the project; add statements of qualification for other personnel. See ARMR, pp. 6–7.

Research Design: Add a research design that informs the significance evaluations of identified cultural resources; this is wholly absent from project documentation. See ARMR, pp. 9–10.

Methods: Provide a discussion of the research conducted to evaluate resource significance (the report is silent on this matter, other than reporting the records search and reviewing some historic maps). Disclose disposition of any field notes, collections, or reports. See ARMR, pp. 10– 11.

Report of Findings (Results): Sketch maps are needed for the following DPR 523 form sets: FW-12, FW-13, FOU0919-2-14, FOU0923-1-2, and FOU1015. See ARMR, p. 12.

Discussion/Interpretation and Management Considerations (Conclusions): Add discussion that references research design. See ARMR, pp. 15–19.

References Cited: Include bibliographic entries for all historic maps consulted. Please provide a copy of the currently missing Stantec, 2020a.

Addendum 1: Update to The Fountain Wind Energy Project Cultural Resources Phase 1 Inventory of 4,463 Acres, Shasta County, California. Prepared for Fountain Wind LLC. March 18, 2020. This

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								will need to be reviewed for adequacy when provided.			
CUL-005	Deficiency Letter Matrix	Cultural Resources	DeOliveira Hatheway Roark	Appendix B (g) (2) (C) cont.	Information included in the technical report shall also be provided in the Application for Certification, except that confidential information (archaeological sites or areas of religious significance) shall be submitted under a request for confidentiality pursuant to California Code of Regulations, title 20, section 2501 et seq. At a minimum, the technical report shall include:		Yes	N/A	N/A	N/A	N/A
CUL-006	Deficiency Letter Matrix	Cultural Resources	Roark	Appendix B (g) (2) (C) (i)	The summary from Appendix B (g)(2)(A) and the literature search results from Appendix B (g)(2)(B);	* Shasta County DEIR Section 3.6.1 Cultural Resources Setting; Section 6.1 CHRIS Record Search Results * Stantec Consulting Services (Stantec), 2019. Fountain Wind Energy Project Cultural Resources Phase 1 Inventory of 4,463 Acres, Shasta County, California. Prepared for Fountain Wind LLC. December 2019.  * Stantec, 2020a. Addendum 1: Update to The Fountain Wind Energy Project Cultural Resources Phase 1 Inventory of 4,463 Acres, Shasta County, California. Prepared for Fountain Wind LLC. March 18, 2020. Confidential DPR Forms Pt1 20230111T150100_ Confidential DPR Forms Pt220230111T150107_	No	Provide revised summary of literature search results from Appendix B(g)(2)(B).		See Section 7.0, Results and Discussion in the updated Cultural Resources Phase I Inventory of 4,463 Acres, Shasta County, California, dated December 6, 2019, revised May 19, 2023 ("rpt_ftnwind_cul_resources_jun2023_compiled_Part1" through "_Part4").	submitted - awaiting CEC response

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CUL-007	Deficiency Letter Matrix	Cultural Resources	DeOliveira Hatheway Roark	Appendix B (g) (2) (C) (ii)	The survey procedures and methodology used to identify cultural resources and a discussion of the resources identified by the survey;	Stantec Consulting Services (Stantec), 2019. Fountain Wind Energy Project Cultural Resources Phase 1 Inventory of 4,463 Acres, Shasta County, California. Prepared for Fountain Wind LLC. December 2019 Section 5.0 Methods  Stantec, 2020a. Addendum 1: Update to The Fountain Wind Energy Project Cultural Resources Phase 1 Inventory of 4,463 Acres, Shasta County, California. Prepared for Fountain Wind LLC. March 18, 2020. Methods Section.  20230111T150116_Confidential Cultural Survey Update.	No	Provide a revised discussion of survey procedures, methods used to identify and evaluate cultural resources, and CEQA implications, incorporating information from the historic architecture survey and other edits to the cultural resources phase 1 inventory report. This discussion must include a version that excludes confidential cultural resources information to facilitate responsible public disclosure.		See Section 6.0 Methods in the updated Cultural Resources Phase I Inventory of 4,463 Acres, Shasta County, California, dated December 6, 2019, revised May 19, 2023 ("rpt_ftnwind_cul_resources_jun2023_compiled_Part1" through "_Part4").	submitted - awaiting CEC response
CUL-008	Deficiency Letter Matrix	Cultural Resources	DeOliveira Hatheway Roark	Appendix B (g) (2) (C) (iii)	Copies of all new and updated DPR 523(A) forms. If a cultural resource may be impacted by the project, also include the appropriate DPR 523 detail form for each such resource;	Stantec Consulting Services (Stantec), 2019. Fountain Wind Energy Project Cultural Resources Phase 1 Inventory of 4,463 Acres, Shasta County, California. Prepared for Fountain Wind LLC. December 2019 Confidential DPR Forms Pt220230111T150107_	No	Provide copies of all new and updated DPR 523 forms per this requirement; these copies must include any DPR 523 forms completed as part of the historic built environment survey required under Appendix B(g)(2)(C).		New and updated DPR forms are provided (filenames with "DPR" and "fwp_updated_records_search_Resource list_compressed").	submitted - awaiting CEC response
CUL-009	Deficiency Letter Matrix	Cultural Resources	DeOliveira Hatheway Roark	Appendix B (g) (2) (C) (iv)	A map at a scale of 1:24,000 U.S. Geological Survey quadrangle depicting the locations of all previously known and newly identified cultural resources compiled through the research required by Appendix B (g)(2)(B) and Appendix B (g)(2)(C) (ii); and	Stantec Consulting Services (Stantec), 2019. Fountain Wind Energy Project Cultural Resources Phase 1 Inventory of 4,463 Acres, Shasta County, California. Prepared for Fountain Wind LLC. December 2019 Figure 5. Recorded Resources and Isolates.	No	Please provide the aforementioned map(s).		Figure 7 of Stantec Consulting Services (Stantec), 2019. Fountain Wind Energy Project Cultural Resources Phase 1 Inventory December 2019 includes previously known and newly recorded resources (TN# [in folder CUL-004]).	submitted - awaiting CEC response



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CUL-010	Deficiency Letter Matrix	Cultural Resources	DeOliveira Hatheway Roark	Appendix B (g) (2) (C) (v)	The names and qualifications of the cultural resources specialists who contributed to and were responsible for literature searches, surveys, and preparation of the technical report.	TN248291- 5_20230103T125603 Cultural Report Author Qualifications Stantec Consulting Services (Stantec), 2019. Fountain Wind Energy Project Cultural Resources Phase 1 Inventory of 4,463 Acres, Shasta County, California. Prepared for Fountain Wind LLC. December 2019 Section 5.0 Methods	No	Please provide missing resumes in TN248291-5_20230103T125603 Cultural Report Author Qualifications, inclusive of a Secretary of the Interior-qualified architectural historian responsible for completing the missing architectural/built environment survey. The application is missing resumes for Dylan Stapleton Leven Kraushaar, Rudy Dinarte, Joshua Taylor, Brandy Doering, Georganne McMaster, Nathan Jereb, Spencer Frye, John Nadolski, and Joshua Peabody		Requested resumes are provided ("fwp_resumes_compiled").	submitted - awaiting CEC response
CUL-011	Deficiency Letter Matrix	Cultural Resources	DeOliveira Hatheway Roark	Appendix B (g) (2) (D)	Provide a copy of your request to the Native American Heritage Commission (NAHC) for information on Native American sacred sites and lists of Native Americans interested in the project vicinity, and copies of any correspondence received from the NAHC. Notify the Native Americans on the NAHC list about the project, including a project description and map. Provide a copy of all correspondence sent to Native American individuals and groups listed by the NAHC and copies of all responses. Provide a written summary of any oral responses.	Shasta County FEIR: Responses to Comments from Tribal Representatives Section 2.2.2; NAHC request letter TN248291- 120230103T125541_Tribal Addendum (1) This is Addendum 2 Updated Cultural Resources Inventory TN248288-8_20230103T105258_DEIR Cultural And Tribal Cultural Resources (1) TN248320- 4_20230104T135807_Pit River Council Meeting Minutes TN248320- 5_20230104T135809_Pit River Meeting Agenda TN248320- 6_20230104T135809_Presentation - Pit River Meeting TN248320- 7_20230104T135810_Pit River Site Visit Confirmation	No	Please provide the original NAHC Sacred Lands File request letter.		NAHC request forms, associated mapping, and request emails are provided (See "fwp_Tribal_Addendum" and "fwp_2017_2019_NAHC req and response_compressed"). Outreach is fully documented in <i>Addendum 2 Fountain Wind Energy Project -- Updated Cultural Resources Inventory Report--Tribal Coordination and Correspondence</i> .	submitted - awaiting CEC response



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CUL-012	Deficiency Letter Matrix	Cultural Resources	DeOliveira Hatheway Roark	Appendix B (g) (2) (E)	Include in the discussion of proposed mitigation measures required by (g)(1):	Shasta County DEIR Section 3-6 Cultural Resources Subsection 3.6.3.2 Direct and Indirect Effects of the Project: Mitigation Measures 3.6-1 through 3.6-3d	No	Please provide an updated discussion of proposed mitigation measures required by (g)(1), after an architectural/built environment survey (See also Appendix B (g) (2) (C)) has been prepared. Please also provide an updated discussion that is suitable for public disclosure (only containing non-confidential cultural resources information).		No mitigation measures are proposed to mitigate impacts to historic built resources within the Study Area because the project would not result in any significant impacts to historic built resources. (See Section 8.0 of the HRER ("fwp_rpt_hrer_submittal_final_compiled"). Two built historic resources exist within the Study Area: the Pit-Vaca Dixon No. 2 and Pit 1 Vaca-Dixon 230 kV Transmission Lines. The Project would directly impact one historical resource, the Pit-Vaca Dixon No. 2, as well as indirectly impact both historical resources within the Study Area; however, the Project would not result in a substantial adverse change to the integrity of either identified historical resources to the degree that they would no longer be eligible as historical resources pursuant to CEQA. Additionally, no related projects were identified based on publicly available information; therefore, the Project would not contribute to cumulative impacts to historical resources. As such, the Project would have a less than significant impact on historical resources. Therefore, no mitigation is required or recommended.  A redacted, publicly reviewable version of the cultural report is provided (TN# ).	submitted - awaiting CEC response
CUL-013	Deficiency Letter Matrix	Cultural Resources	DeOliveira Hatheway Roark	Appendix B (g) (2) (E) (i)	A discussion of measures proposed to mitigate project impacts to known cultural resources;	Shasta County DEIR Section 3-6 Cultural Resources Subsection 3.6.3.2 Direct and Indirect Effects of the Project: Mitigation Measures 3.6-1 through 3.6-3d	No	Please provide updated mitigation measures proposed to mitigate project impacts to known cultural resources as necessary after an architectural/built environment survey (See also Appendix B (g) (2) (C)) has been prepared.		See response to CUL-012. No mitigation measures are required because the Project would not result in significant impacts to any historic built resources.	submitted - awaiting CEC response
CUL-014	Deficiency Letter Matrix	Cultural Resources	DeOliveira Hatheway Roark	Appendix B (g) (2) (E) (ii)	A set of contingency measures proposed to mitigate potential impacts to previously unknown cultural resources and any unanticipated impacts to known cultural resources; and	Shasta County DEIR Section 3-6 Cultural Resources Subsection 3.6.3.2 Direct and Indirect Effects of the Project: Mitigation Measures 3.6-1 through 3.6-3d	No	Please provide updated mitigation measures proposed to mitigate potential impacts to previously unknown cultural resources as necessary after an architectural/built environment survey (See also Appendix B (g) (2) (C)) has been prepared.		See response to CUL-012. No mitigation measures are required because the Project would not result in significant impacts to any historic built resources.	submitted - awaiting CEC response

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CUL-015	Deficiency Letter Matrix	Cultural Resources	DeOliveira Hatheway Roark	Appendix B (g) (2) (E) (iii)	Educational programs to enhance employee awareness during construction and operation to protect cultural resources.	Shasta County DEIR Section 3-6 Cultural Resources Subsection 3.6.3.2 Direct and Indirect Effects of the Project: Mitigation Measures 3.6-1 through 3.6-3d TN248291- 120230103T125541_Tribal Addendum. This is Addendum 2 Updated Cultural Resources Inventory Final EIR, Appendix G, Table G-1, pp. E-11 to E-13	Yes	N/A	N/A	N/A	N/A
CUL-016	Deficiency Letter Matrix	Cultural Resources	DeOliveira Hatheway Roark	Appendix B (i) (1) (A)	Tables that identify laws, regulations, ordinances, standards, adopted local, regional, state, and federal land use plans, leases, and permits applicable to the proposed project, and a discussion of the applicability of, and conformance with each. The table or matrix shall explicitly reference pages in the application wherein conformance, with each law or standard during both construction and operation of the facility is discussed; and	* Table of Applicable LORS * Shasta County Staff report dated 6/22/21 to the Planning Commission, pp. 12-13 * Stantec Consulting Services (Stantec), 2019. Fountain Wind Energy Project Cultural Resources Phase 1 Inventory of 4,463 Acres, Shasta County, California. Prepared for Fountain Wind LLC. December 2019, p. 48. TN248288-8_20230103T105258_DEIR Cultural And Tribal Cultural Resources, pp. 3.6-16 – 3.6-18	No	Add the authorities listed on pp. 3.6-16 – 3.6-18 to the Table of Applicable LORS and discuss the project's conformance with each.	12-Apr	Updated LORS Consistency Matrix (TN# 249636) and General Plan Consistency Matrix (TN# 249635) were provided on April 12, 2023.	submitted - awaiting CEC response

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CUL-017	Deficiency Letter Matrix	Cultural Resources	DeOliveira Hatheway Roark	Appendix B (i) (1) (B)	Tables that identify each agency with jurisdiction to issue applicable permits, leases, and approvals or to enforce identified laws, regulations, standards, and adopted local, regional, state and federal land use plans, and agencies which would have permit approval or enforcement authority, but for the exclusive authority of the Commission to certify sites and related facilities.	DEIR Section 2 Description of Project and Alternatives, p. 2-41, Table 2-8 (Summary of Permits and Approvals)	Yes	N/A	N/A	N/A	N/A
CUL-018	Deficiency Letter Matrix	Cultural Resources	DeOliveira Hatheway Roark	Appendix B (i) (2)	The name, title, phone number, address (required), and email address (if known), of an official who was contacted within each agency, and provide the name of the official who will serve as a contact person for Commission staff.	Scoping Report Appendix B, Direct Mail Notice	No	Although the Scoping Report identifies the agencies contacted for CEQA scoping, the application does not provide the names and contact information for agency personnel. Please provide required phone numbers, addresses, etc.	3-Apr	Table of applicable permits, agency contact information, and the schedule to obtain legally binding enforceable agreement(s) with community-based organizations and/or permitting entities was submitted on April 3, 2023 (TN# 249533).	closed out
CUL-019	Deficiency Letter Matrix	Cultural Resources	DeOliveira Hatheway Roark	Appendix B (i) (3)	A schedule indicating when permits outside the authority of the Commission will be obtained and the steps the applicant has taken or plans to take to obtain such permits.	Table 3 in Project Description	No	N/A	3-Apr	Table of applicable permits, agency contact information, and the schedule to obtain legally binding enforceable agreement(s) with community-based organizations and/or permitting entities was submitted on April 3, 2023 (TN# 249533).	closed out

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CUL2-01	Deficiency Letter Attachment B	Cultural Resources	Not specified	Not specified	<p>In accordance with Appendix B (g) (2) (A), cultural documentation shall include “A summary of the ethnology, prehistory, and history of the region with emphasis on the area within no more than a 5-mile radius of the project location.”</p> <p>The DEIR and the Stantec Phase 1 Inventory provided for review contain sections on the ethnology, prehistory, and history of the region. The ethnography and prehistory portions appear as very limited, but the history sections appear to have not included potentially key data. By way of example, a cursory review of just historic General Land Office (GLO) maps ranging in age from 1868 to 1892, in just in a very small area straddling today’s State Route 299, finds that various early named historic features including Ft. Crook Road, Cummege’s Toll Road (Stage Road), and Carberry’s House are within or in the immediate vicinity of the Project Site. Agricultural fields are also shown. Independent historical research conducted by CEC staff in review of docketed reports was limited, but it does underscore the fact that the cultural documents provided for review do not reference the above-named historic features in their summaries of the history of the region. These are all within a 5-mile radius of the project location.</p>	Not specified	No	<p>1. Please update the historic context, as presented in the Phase 1 cultural resources inventory report (Stantec 2019), to minimally include a discussion of the background history to provide for an understanding of various historic cultural resources and named historic features that are within no more than a 5-mile radius of the project location. The historic context shall discuss the role of California Native Americans in the project vicinity to reflect the high proportion of California Indians reported in the 1880 U.S. Census. This update should take place following completion of an architectural/built environment survey and report by or under the direction of an NPS qualified Architectural Historian (See also Section Appendix B (g) (2) (C).</p>		<p>The revised Cultural Resources Phase I Inventory of 4,463 Acres, Shasta County, California, dated December 6, 2019, revised May 19, 2023 includes an updated historic context, including a discussion of the role of California Native Americans in the vicinity (TN# ) in Section 5.1. The supplemental HRER includes a discussion of the history of the Hatchet Mountain area with a focus on built resources within 5 miles of the Project area (see Section 4.2 of the HRER [“fwp_rpt_hrер_submittal_final_compiled”]).</p>	submitted - awaiting CEC response

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CUL2-02	Deficiency Letter Attachment B	Cultural Resources	Not specified	Not specified	<p>The original record search conducted by Stantec was for a 0.25-mile area surrounding the original project site. Current CEC guidelines require that cultural documentation shall include the results of a record search within an area not less than a 1-mile radius around the project site and not less than one-quarter (0.25) mile on each side of the linear facilities. CEC staff is unable to determine whether the original records search covers the current project site as no Northeast Information Center request letter and USGS 7.5' map has been provided, and no USGS 7.5' map clearly delineating the location of the project site has been provided. The current project site is known to be smaller than the original project site, and it is understood that Stantec is evaluating whether or not the original records search boundary entirely covers the current project site.</p>	Not specified	No	<p>This data request is made in addition to previously requested information in the Data Adequacy Worksheet. If Stantec staff determine that the original records search boundaries are inadequate, then Stantec shall conduct a new records search within an area not less than a 1-mile radius around the project site and not less than one-quarter (0.25) mile on each side of the linear facilities in accordance with CEC regulations, and provide all new documents, reports, and site records for review.</p>		See response to CUL-003.	submitted - awaiting CEC response

CUL2-03	Deficiency Letter Attachment B	Cultural Resources	Not specified	<p>The background data request below provide additional direction concerning Appendix B (g) (2) (C)'s requirement, <b>“New historic architecture field surveys in rural areas shall be conducted inclusive of the project site and the project linear facility routes, extending no less than .5 mile out from the proposed plant site and from the routes of all above-ground linear facilities. New historic architecture field surveys in rural areas shall be conducted inclusive of the project site and the project linear facility routes, extending no less than .5 mile out from the proposed plant site and from the routes of all above-ground linear facilities. New historic architecture field reconnaissance (“windshield survey”) in urban and suburban areas shall be conducted along the routes of all linear facilities to identify, inventory, and characterize structures and districts that appear to be older than 45 years or that are exceptionally significant, whatever their age.”</b></p> <p>No architectural/built environment survey is known to have been conducted, or at least no such survey report has been Docketed or specifically referenced as having been prepared in any key cultural document. Interestingly, the DEIR states on page 3.6-20 that “There are no impacts to historic architectural resources from the proposed Project.”</p> <p>CEC staff did review one document referring to the recordation of Built Environment features and sites, Docketed, TN248291-6_20230103T125604_Figure - Sites Built Before 1977, in apparent support of complying with requirements to identify 45+ year old historic properties. This document consists of one aerial map. Its use is limited as no architectural/built environment survey or research is known to have been conducted.</p> <p>CEC staff conducted a cursory</p>	Not specified	<p>No</p> <p>If an architectural field survey has been conducted and a built environment cultural resources compliance report previously prepared in accordance with Appendix B guidelines, then please provide this report for review.</p> <ul style="list-style-type: none"> <li>• If an architectural field survey has not been conducted and a built environment cultural resources compliance report not previously prepared, <b>then please conduct a historic architecture field survey inclusive of the project site and the project linear facility routes, extending no less than .5 mile out from the proposed plant site and from the routes of all above-ground linear facilities.</b> A Secretary of the Interior-qualified historian or architectural historian shall conduct or oversee this survey and shall be listed as the author of the report prepared.</li> <li>• <b>Please include State Route 299 in the built environment report.</b> Confer with entities knowledgeable about the history of State Route 299, such as the California Department of Transportation and the Pit River Tribe (specifically Brandy McDaniels).</li> <li>• This report should comply with ARMR guidelines per Siting Regulation Appendix B (g) (2) (C).</li> <li>• It is further suggested that the report also be prepared in consideration of guidelines as outlined in Caltrans Volume 2 - Standard Environmental Reference, Chapter 6;</li> </ul>	<p>Per CEC's request, an HRER was prepared by an SOIS-qualified architectural historian (“fwp_rpt_hrer_submittal_final_compiled”). The Study Area is defined in Section 3.1 of the HRER. It encompasses the Project Site plus a radius of 0.5-miles from proposed wind turbines and aboveground collector lines. The only historic built resources newly identified within the Study Area during the field inspection were roads, specifically SR 299 and logging roads. Built resources not surveyed as part of the field inspection included additional logging roads less than 45 years old. There were no other built resources identified within the Study Area that were more than 45 years old and had the potential to be impacted by the Project. Both SR 299 and logging roads more than 45 years old were evaluated for the National Register of Historic Places and California Register of Historical Resources using the established national and state criteria (see Section 5.1 of the report). The HRER conforms to professional standards and guidelines for architectural history.</p>	submitted - awaiting CEC response
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and non-exhaustive review of historic General Land Office (GLO) maps ranging in age from 1868 to 1892, in just in a very small area straddling today's State Route 299, finds that various early named historic features including **Ft. Crook Road, Cummeg's Toll Road (Stage Road), and Carberry's House** are within or in the immediate vicinity of the Project Site. Very preliminary research conducted by CEC staff reveals that considerable information is available from various historic newspapers regarding the above noted historic sites or properties. Carberry House was the residence of Judge Carberry (San Francisco Call 1895: 5), and Henry Cummegs, a resident of Montgomery Creek, is the individual associated with "Cummeg's Toll Road" (Free Press 1898, page 2). CEC staff also reviewed historic USGS topo maps which identified **many 70+ year old historic built environment features (primarily roads, trails, and highways)** that do not appear to have been identified or recorded by Stantec. A brief and non-exhaustive review using [www.historicaerials.com](http://www.historicaerials.com) indicates that several of these roads and trails may survive, as well as small sections of the 1868-1892 GLO trails and roads referenced earlier. By way of example, potentially historic properties appearing on the historic 1956 Montgomery Creek USGS Quadrangle 1:62,500 scale map for just Township 35N Range 1 East includes but is not limited to the following. There appears to have been no recordation or very limited recordation of **unnamed 45+ year old logging roads, historic fence lines, and historic agricultural and landscape features. Many roads and trails, and an "abandoned" road** appear in photographs in the Cultural Resources Phase 1 Inventory of 4,463 Acres Administrative Draft report, or Addendum 3 to the Phase 1 Inventory. They are not

Built Environment Cultural Resources Evaluation and Treatment, 2019 Update rev: 07/15/20 built environment features. **Please evaluate all highways, roads, and trails** in consideration of A Historical Context and Methodology for Evaluating Trails, Roads, and Highways in California, prepared by Caltrans, Sacramento, 2016.

- The applicant may choose to combine the historic built environment inventory report with the Phase 1 cultural resources report and addenda for convenience of use by others and to ensure a comprehensive treatment of all types of cultural resources in the project area.



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					<p>recorded. Finally, <b>Supan Road, Goat Creek Road, and Road 200T</b> are mentioned by name/number in the Cultural Resources Phase 1 Inventory of 4,463 Acres Administrative Draft report but not evaluated. Finally, CEC staff has prepared a USGS map depicting the Project Site on the 1995 Hatchet Mountain Pass and 1990 Montgomery Creek, Calif., 1:24,000 scale quadrangle maps. Using this map, staff have made a preliminary effort to determine if project construction impacts including turbine locations, linears, or construction access roads might impact unrecorded and potentially significant historic features. This effort has focused solely on historic Fort Crook Road and Cummeg's Toll Road as identified by name on historic GLO maps. Not all available GLO maps information is presented below. The only purpose here is to demonstrate that potentially significant and unrecorded historic built environment resources might be impacted by the proposed project. This, as a means of underscoring the need for completing a historic architecture field survey and ARMIR-compliant report inclusive of the project site and project linear facility routes, extending no less than 0.5 mile out from the proposed plant site and from the routes of all above-ground linear facilities. Many additional historic features not referenced below exist.</p>						



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CUL2-04	Deficiency Letter Attachment B	Cultural Resources	Not specified	Not specified	In accordance with Appendix B (g) (2) (C) (i), cultural documentation shall include "The summary from Appendix B (g)(2)(A) and the literature search results from Appendix B (g)(2)(B)." Based on data inadequacies previously identified by staff these procedures and methodologies require updating.	Not specified	No	Please Provide revised summary of literature search results from Appendix B(g)(2)(B).		See Section 7.1 in the updated Cultural Resources Phase I Inventory of 4,463 Acres, Shasta County, California, dated December 6, 2019, revised May 19, 2023 ("rpt_ftnwind_cul_resources_jun2023_compiled_Part1" through "_Part4").	submitted - awaiting CEC response
CUL2-05	Deficiency Letter Attachment B	Cultural Resources	Not specified	Not specified	In accordance with Appendix B (g) (2) (C) (ii) cultural documentation shall include "The survey procedures and methodology used to identify cultural resources and a discussion of the resources identified by the survey." Based on data inadequacies previously identified by staff these procedures and methodologies require updating.	Not specified	No	Please provide a revised discussion of survey procedures, methods used to identify and evaluate cultural resources, and CEQA implications, incorporating information from the historic architecture survey. This discussion must include a version that excludes confidential cultural resources information to facilitate responsible public disclosure.		See Section 3.0 of the HRER ("fwp_rpt_hrer_submittal_final_compiled").	submitted - awaiting CEC response

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CUL2-06	Deficiency Letter Attachment B	Cultural Resources	Not specified	Not specified	<p>In accordance with Appendix B (g) (2) (C) (iii), cultural documentation shall include "Copies of all new and updated DPR 523(A) forms. If a cultural resource may be impacted by the project, also include the appropriate DPR 523 detail form for each such resource."</p> <p>New site records were provided for review in a document entitled: Confidential DPR Forms Pt1 20230111T150100. These sites were discovered by Stantec during a survey of the Fountain Wind Energy Project 4,463 Acre Project Site. The report citation listed throughout on each form is: Stantec 2019, Cultural Resources Inventory and Evaluation for the Kudu Solar Project, Kern County, California. This citation is incorrect and is very confusing to the reader of the new DPR 523 site record.</p>	Not specified	No	Please revise the report citation on all newly recorded sites to reflect the appropriate report and Please provide copies of all new DPR 523 forms completed as part of the historic built environment survey required under Appendix B(g)(2)(C).		See Section 5.0 and Appendix A of the HRER ("fwp_rpt_hrер_submittal_final_compiled").	submitted - awaiting CEC response

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CUL2-07	Deficiency Letter Attachment B	Cultural Resources	Not specified	Not specified	In accordance with Appendix B (g) (2) (C) (iv) cultural documentation shall include "A map at a scale of 1:24,000 U.S. Geological Survey quadrangle depicting the locations of all previously known and newly identified cultural resources compiled through the research required by Appendix B (g)(2)(B) and Appendix B (g)(2)(C) (ii)." This map was not provided. Based on data inadequacies previously identified by staff the any provided using existing information may have to be updated say, for example, if a new NEIC Records Search request requires extending the existing 0.25-mile buffer surrounding the Project Site to a 1-mile buffer surrounding the Project Site as currently required by CEC.	Not specified	No	Please provide a map at a scale of 1:24,000 U.S. Geological Survey quadrangle depicting the locations of all previously known and newly identified cultural resources compiled through the research required by Appendix B (g)(2)(B) and Appendix B (g)(2)(C) (ii).  Please provide resumes of all personnel involved in the Phase 1 Inventory and any other addenda or reports in TN248291-5_20230103T125603 Cultural Report Author Qualifications, inclusive of a Secretary of the Interior-qualified architectural historian responsible for completing the missing architectural/built environment literature review and survey in accordance with Appendix B (g) (2) (C) (v).		See responses to CUL-009 and CUL-010.	submitted - awaiting CEC response
CUL2-08	Deficiency Letter Attachment B	Cultural Resources	Not specified	Not specified	In accordance with Appendix B (i) (3) a schedule indicating when permits outside the authority of the commission will be obtained and the steps the applicant has taken or plans to take to obtain such permits is required.	Not specified	No	If the requested architectural/built environment survey will require valid permits to conduct the survey (i.e. Forest Service permits), please update the Phase 1 Inventory report to include information indicating when permits outside the authority of the commission will be obtained and the steps the applicant has taken or plans to take to obtain such permits.		No permits are needed to conduct built environment surveys on private land. The survey area consisted entirely of private land.	submitted - awaiting CEC response

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CUL2-09	Deficiency Letter Attachment B	Cultural Resources	Not specified	Not specified	CEC staff could not find a clear discussion about the depth of all proposed ground disturbance or grading of any access roads. Based on preliminary research as previously discussed, several access roads may in fact be considered historical resources.	Not specified	No	Revise the cultural report to include the location(s) of all ground disturbing activity proposed as part of the project and the depth of each identified disturbance including grading and proposed realignment of any identified access roads.		The updated Cultural Resources Phase I Inventory of 4,463 Acres, Shasta County, California, dated December 6, 2019, revised May 19, 2023 ("rpt_ftnwind_cul_resources_jun2023_compiled_Part1" through "_Part4") contains a discussion of the location of ground-disturbing activity (Figure 4), the depth of disturbance (Table 1), and the proposed widening of access roads.	submitted - awaiting CEC response