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Fountain Wind Project (23-OPT-01) Responses to CEC Data Requests

Data Request Identifier	Request Source	Topic	Reviewer	Siting Regulations	Information	Opt-In Page Number And Section Number	Original Determi-nation of Adequacy	Information Required To Make OPT Conform With Regulations	Response Date	Applicant Response No. 1	CEC Disposition 1	Applicant Response No. 2
AIR-001	Deficiency Letter Matrix	Air Quality	Hughes	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.	Shasta County DEIR, Section 3.3 Air Quality (TN 48288-5); Shasta County DEIR, Section 3.10 Greenhouse Gas Emissions (TN 248288-12); Shasta County DEIR Appendix B Air Quality and Greenhouse Gas Emissions (TN 248291-4)	No	Background: Construction and Operational Emissions and Assumptions - The construction and operational emission estimates and assumptions provided in the DEIR were based on the first revision to the original project proposal from 2019 (published by Shasta County in July 2020). The current proposal would, among other things, reduce the number of wind turbines being constructed from 72 to 48, decrease the permanent disturbance area from 180 acres to 120 acres, reduce the vehicle and equipment miles traveled on onsite unpaved roads and access roads, reduce the number of turbine deliveries from the port, and other proposed changes that could reduce or change the construction and operational related emissions. Request: Construction and Operational Emissions and Assumptions - Please update the construction and operational related emission estimates to reflect the emissions that would be generated from the currently proposed project. Please provide a detailed construction schedule that explains the activities that would occur during each phase of construction, including a description of how long construction would occur at each wind turbine tower pad, whether the turbines and pads would be installed one at a time or in groups, and whether construction activities would be occurring continuously throughout the entirety of the project site or if construction activities would move throughout the site as completion of the installation of the turbines and pads are completed. This well help staff identify when and where construction related impacts are occurring and for how long. Please provide the locations and distances of sensitive receptors with respect to these activities. Please provide a detailed discussion on all assumptions used to generate the updated construction and operational emission estimates. Please update all aspects of DEIR Appendix B Air Quality and Greenhouse Gas Emissions as necessary based on the revised project description. Please provide the Excel spreadsheets with live, embedded calculations so staff can verify the emission estimates and assumptions.	5/23/2023 and 29-Jun	Construction emissions have been updated to account for the reduction in project size, accounting for the 33% reduction in wind turbines and disturbance area. Construction activities would be occurring continuously throughout the site and would not be constructed one-by-one. Updated modeling output files (including updated excel spreadsheets [TN#250274] and CalEEMod output files) and a discussion regarding updated inputs are provided (TN# 250273).	AIR-001 - The "Request" under "Information Required" asks for a lot of detail that is not in the Response, inlcuding a description of how long construction would occur at each wind turbine tower pad and the locations and distances of sensitive receptors with respect to these activities. Please identify the exact location of each wind turbine tower pad and how far each wind turbine is from the nearest sesnative receptor. Please also provide the live Excel spreadsheets used to complete the construction emission calculations so staff can verify the assumptions and calculations.	Construction at each turbine pad location will likely take place intermittently for the duration of the construction period, which is anticipated to be between 24 and 28 months. The closest sensitive receptor to any turbine pad location is approximately 2,109 feet. The closest sensitive receptor to any currently anticipated construction activity is approximately 418 feet from the edge of the western access road that enters the site off of US HWY 299 and travels on the west side of Moose Camp. Live Excel spreadsheets were provided via Kiteworks on June 29, 2023 (TN# 250818) and PDF outputs were provided via the docket (TN# 250824).

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AIR-010	Deficiency Letter Matrix	Air Quality	Hughes	Appendix B (g) (8) (H)	One year of meteorological data collected from either the Federal Aviation Administration Class 1 station nearest to the project or from the project site, or meteorological data approved by the California Air Resources Board or the local air pollution control district.	Not included	No	If it's determined that an air quality modeling analysis is required under Appendix B (g)(8)(I)(i) or Appendix B (g)(8)(I)(ii) below, then please provide the meteorological data approved by the California Air Resources Board or the local air pollution control district.	5/23/2023 and 29-Jun	An ambient air quality analysis is not required under Appendix B (g)(8)(I)(i) and Appendix B (g)(8)(I)(ii) and as such, meteorological data is not required to conduct analysis.	AIR-010 - Per request AIR-013, the application requires an ambient air quality impact analysis of criteria pollutant impacts during project construction activities. For a screening level dispersion modeling analysis, meteorological data would be generated automatically by the chosen model (e.g., AERSCREEN or SCREEN3). If a screening level analysis is not used, the applicant will need to submit one year of meteorological data collected from either the Federal Aviation Administration Class 1 station nearest to the project or from the project site, or meteorological data approved by the California Air Resources Board or the local air pollution control district in format suitable for use in AERMOD.	Dispersion modeling is required if the Project has the potential to worsen ambient air quality in the region, specifically with regards to ozone. Whether dispersion modeling is necessary in a particular case is based on a screening analysis. To ensure an individual project meets CAAQS thresholds for ozone, Shasta County AQMD established project-specific thresholds for ROG and NOx (ozone precursors) and PM10 emissions. Construction emissions of ROG and NOx were modeled in CalEEMod based on the 48-turbine layout. Results show that ROG and NOx emissions generated by Project construction fall below Shasta County AQMD Level B thresholds for these pollutants with mitigation implemented. As a result, dispersion modeling is not required because the Project's projected emissions do not exceed the threshold for ROG and NOx set by the Shasta County AQMD, which is also the trigger for dispersion modeling. HARP AERMOD data files from the California Air Resources Board's Redding airport station were provided via Kiteworks on June 29, 2023 (TN# 250818). PDFs were also provided (TN# 250815). The dataset comprises 2017-2021.
AIR-012	Deficiency Letter Matrix	Air Quality	Hughes	Appendix B (g) (8) (H) (ii)	The data shall include quarterly wind tables and wind roses, ambient temperatures, relative humidity, stability and mixing heights, upper atmospheric air data, and an analysis of whether this data is representative of conditions at the project site.	Not included	No	If it's determined that an air quality modeling analysis is required under Appendix B (g)(8)(I)(i) or Appendix B (g)(8)(I)(ii) below, then please provide the meteorological data with the information required under Appendix B (g)(8)(H)(ii).	5/23/2023 and 29-Jun	An ambient air quality analysis is not required under Appendix B (g)(8)(I)(i) and Appendix B (g)(8)(I)(ii) and as such, meteorological data is not required to conduct analysis.	AIR-012 - Similar to AIR-010. For a screening level dispersion modeling analysis, meteorological data would be generated automatically by the chosen model (e.g., AERSCREEN or SCREEN3). If a screening level analysis is not used, the applicant will need to submit the data consistent with AIR-012 for use in AERMOD.	See response to AIR-010.

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AIR-013	Deficiency Letter Matrix	Air Quality	Hughes	Appendix B (g) (8) (I) (i)	An evaluation of the project's direct and cumulative air quality impacts, consisting of: A screening level air quality modeling analysis, or a more detailed modeling analysis if so desired by the applicant, of the direct criteria pollutant impacts of project construction activities on ambient air quality conditions, including fugitive dust (PM10) emissions from grading, excavation and site disturbance, as well as the combustion emissions [nitrogen oxides (NOx), sulfur dioxide (SO2), carbon monoxide (CO), and particulate matter less than 10 microns in diameter (PM10) and particulate matter less than 2.5 microns in diameter (PM2.5) from construction-related equipment;	Shasta County DEIR, Section 3.3 Air Quality (TN 48288-5); Shasta County DEIR Appendix B Air Quality and Greenhouse Gas Emissions (TN 248291-4)	No	Provide the air quality modeling analysis to determine construction related impacts consistent with the revised construction emission estimates and assumptions as requested under Appendix B (g)(8)(A) requirements above. Otherwise, provide a detailed justification of why such modeling isn't required for this project based on the revised construction emission estimates and assumptions as requested under Appendix B (g)(8)(A) requirements above.	23-May	Please see updated air quality modeling analysis (TN# 250273).	AIR-013 - The response (TN 250273) provides emissions rates without an evaluation of impacts to ambient air quality. The required ambient air quality impact analysis will determine downwind concentrations of criteria pollutants during project construction activities. The evaluation will compare the results to the California Ambient Air Quality Standards (CAAQS) and National Ambient Air Quality Standards (NAAQS). Applicant may choose to use a screening model (e.g., AERSCREEN or SCREEN3) or refined model (e.g., AERMOD).	See response to AIR-010.

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AIR-014	Deficiency Letter Matrix	Air Quality	Hughes	Appendix B (g) (8) (I) (ii)	A screening level air quality modeling analysis, or a more detailed modeling analysis if so desired by the applicant, of the direct criteria pollutant (NOx, SO2, CO, PM10, and PM2.5) impacts on ambient air quality conditions of the project during typical (normal) operation, and during shutdown and startup modes of operation. Identify and include in the modeling of each operating mode the estimated maximum emissions rates and the assumed meteorological conditions;	Shasta County DEIR, Section 3.3 Air Quality (TN 48288-5); Shasta County DEIR Appendix B Air Quality and Greenhouse Gas Emissions (TN 248291-4)	No	Provide the air quality modeling analysis for the readiness testing and maintenance of the 268 hp emergency generator. Otherwise, provide a detailed justification of why such modeling isn't required for this project. Including a description of the engine location on the site, the distance to sensitive receptors, etc.	23-May	Emission calculations for the 268 hp emergency generator are included in the updated air quality modeling analysis (TN# 250273).	AIR-014 - The response (TN 250273) indicates that emissions during typical operation will be much lower than those during project construction activities. The applicant may evaluate impacts to ambient air quality during construction activities (Request AIR-013) and discuss why additional modeling may not be necessary for charactrizing the impacts of typcial operation.	See response to AIR-010.

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GEO-04	Deficiency Letter Matrix	Geological Hazards	N/A	Appendix B (g) (17) (C)	A map and description of geologic resources of recreational, commercial, or scientific value which may be affected by the project. Include a discussion of the techniques used to identify and evaluate these resources.	Not Provided but the applicant notes in the Appendix B Crosswalk Matrix that the project will not impact geologic resources of recreational, commercial, or scientific value.	No	Provide map and description	11-May	There are no geologic resources of recreational, commercial, or scientific value that may be affected by the project. See figure provided (TN# 250100).	The information submitted is incomplete. The specific information still needed is a discussion of the techniques used to identify and evaluate these resources. The maps (Geologic Resources of Recreational, Commercial, or Scientific Value Sheets 1 through 3) only appear to show a topographic base map with the project elements and the Lassen National Forest boundary. What other references were used to determine whether or not there were other exiting or potential commercial or scientific values at the site?	A literature review was conducted to identify and evaluate potential geologic resources of recreational, commercial, or scientific value. The Applicant reviewed Shasta County's references cited in their geologic resources section of the Draft EIR and revisited those sources (where online) to confirm their conclusions. The Applicant also undertook a desktop evaluation of geospatial and online sources pertaining to geologic, recreational/scenic, and scientific resources, including Shasta County's General Plan and the Visual Resources Impact Analysis for this Project (TN# 248320-12 and -13). Sources used to evaluate the potential presence of geologic resources of recreational, commercial, or scientific value are as follows: * California Geological Survey, 1991. State of California Special Studies Zones. Burney Quadrangle. Official Map. effective November 1, 1991. * Choose Redding. 2019. 7 Natural Wonders to Expore Around Redding, CA. Available at: https://www.chooseredding.com/articles/7-natural-wonders-to-explore-around-redding-ca * Clynne et al., 2012. Geologic Field-Trip Guide to the Lassen Segment of the Cascades Arc, Northern California. Scientific Investigation Report 2017-5022-K2. U.S. Geological Survey. * Dupras, D., 1997. Geology of Eastern Shasta County. California Geological Survey. Map. Scale 1:100,000. * Shasta County, 2018. Shasta County General Plan, Section 5.1, Seismic and Geologic Hazards. Available online at: https://www.co.shasta.ca.us/docs/libraries/resource-management-docs/docs/51seismic.pdf?sfvrsn=3dc59a95_0. * Shasta County, 2004. Shasta County General Plan as Amended Through September 2004. September. Available online: https://www.co.shasta.ca.us/index/drm_index/planning_index/plng_general_plan.aspx. * California Department of Transportation (Caltrans), 2019. List of eligible and officially designated State Scenic Highways, August, 2019. Available online: https://dot.ca.gov/programs/design/lap-landscape-architectureand- community-livability/lap-liv-i-scenic-highways. * Visit Redding. 2023. National and State Parks. Available at: https://visitredding.com/get-outside/national-state-parks/

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HAZ-09	Deficiency Letter Matrix	Hazards and Hazardous Materials	Patterson Eaker	Appendix B (g) (10) (G)	A discussion of the fire and explosion risks associated with the project.	• Shasta County DEIR Section 3.16 Wildfire; • Quigley, Darin, and Syndy Zerr. 2021. Fountain Wind Project EIR Wildfire Effects Review. Letter to Shasta County Planning Commission. June 17.; • Staff Report to the Planning Commission dated 6/22/21 p. 8-9; • Fountain Wind Project Fire Safety Enhancement and Assessment. Letter for Shasta County Board of Supervisors from Darin Quigley, October 19, 2021.; • Letter from Henry Woltag to Paul Hellman, June 21, 2021 • Shasta County Scoping Report at u) Wildfire	No	A discussion of blasting is mentioned in the application but no mention of the explosive hazards due to the potential presence of explosives onsite during construction is found in any of the documents. Please add a discussion of the hazards of potential onsite explosives during construction in the Hazards and Hazardous Materials Section.	25-May	A discussion of blasting is included in the Shasta County DEIR Sections 2.4.5.1 (blasting overview); 3.11.1.2 (blasting overview, compliance with regulations, and best management practices); 3.16-2 (wildfire risks, including a discussion of impacts of blasting); and Mitigation Measure 3.12-2: Best Management Practices for Blasting (mitigation of blasting hazards).	The informatin submitted is incomplete. The indicated discussions in the DEIR do not provide an impact discussion of blasting hazards to workers, structures, and equipment during construction.Please provide a discussion of impacts related to physical hazards to workers and the public due to the transportation, use, and storage of explosives and how MM 3.12-2 and existing regulations will likely reduce these impacts.	Blasting activities may be required, and could pose a hazard to project workers during foundation construction in some locations if rock is present. Areas where blasting would be utilized have not been determined; therefore, it is difficult to assess the potential impacts that would be caused by blasting activities. Because no members of the public (i.e., at residences) would be located within 2,000 feet of any blasting location (see LU-002, TN# 250712) and are restricted from entering the Project site boundary since it is private property, blasting activities would not have an impact on the public. Transportation of explosives will be conducted in compliance with 49 CFR Part 171-177. Prior to blasting, a person licensed by the Federal Bureau of Alcohol, Tobacco, and Firearms would assess the area and take site measurements in order to engineer the blast for a safe and effective explosion. Furthermore, pre-blast notification would be made to the local fire department, residents, utilities, and others potentially affected by blasting operations. Although the Applicant has committed to taking precautions, implementation of Mitigation Measure 3.12-2 in the Shasta County EIR would be required to set forth appropriate performance criteria and to ensure that safety impacts associated with blasting would be reduced to less than significant.

HAZ2-01	Deficiency Letter Attachment B	Hazards and Hazardous Materials	Not specified	Not specified	BACKGROUND: Ice Shed, glyphosate herbicides, shadow flicker, naturally occurring arsenic The Direct and Indirect Effects of the Project section (3.11.3.2) discusses potential effects of ice shed from turbine blades, use of glyphosate weed killers (herbicides), and changes in light intensity (shadow flicker). Multiple citations are provided for the information and potential impacts discussed for these issues, however many of the references cited are not readily available for review to verify information provided.	Not specified	No	Please provide copies of the following references that are not readily available online (for many the online link does not work). • American Wind Energy Association (AWEA), 2020. Setbacks. Available online at: https://www.awea.org/policy-and-issues/project-development/state-and-local-permitting/setbacks. Accessed March 29, 2020. • Bundesinstitut fur Risikobewertung (BfR), 2015. The BfR has finalized its draft report for the reevaluation of glyphosate. BfR Communication No. 008/2015. February 4, 2015. • Business Enterprise & Regulatory Reform (BERR). 2008. Onshore Wind: Shadow Flicker Available online at: https://webarchive.nationalarchives.gov.uk/20081013125014/ http://www.berr.gov.uk/whatwedo/energy/sources/renewables/planning/onshore-wind/shadow-flicker/page18736.html Archived October 19, 2008; accessed June 19 • Cattin, R., S. Kunz, A. Heimo, G. Russi, M. Russi, and M. Tiefgraber, 2014. Wind Turbine Ice Throw Studies in the Swiss Alps. June 1, 2014. Available online at: https://www.researchgate.net/publication/228491358_Wind_turbine_ice_throw_studies_in_the_Swiss_Alps. • Chief Medical Officer of Health (CMOH), 2010. The Potential Health Impact of Wind Turbines. May 2010. Available online at: http://health.gov.on.ca/en/common/ministry/publications/reports/wind_turbine/wind_turbine.pdf. • deRoos et al., 2005. Cancer Incidence among Glyphosate-Exposed Pesticide Applicators in the Agricultural Health Study. Published in Environ Health Perspect. 2005 Jan; 113(1): 49–54 • International Agency for research on Cancer (IARC), 2015. IARC Monographs Volume 112: evaluation of five organophosphate insecticides and herbicides. March 20, 2015. • Morgan, C., E. Bossanyi, and H. Seifert, 1998. Assessment of Safety Risks Arising from Wind Turbine Icing. April 2, 1998. Available online at: http://citeseerx.ist.psu.edu/viewdoc/download?doi=10.1.1.584.6044&rep=rep1&type=pdf. • Smedley, P. L., and D. Kinniburgh, 2002. A Review of the Source, Behaviour and Distribution of Arsenic in Natural Waters. Applied Geochemistry 17:517–568. Available online at: 10.1016/S0883-2927(02)00018-5. • Valavanidis, 2018. Glyphosate, the Most Widely Used Herbicide. Department of chemistry, national and Kapodistrian University of Athens, Greece. Published March 2018.	25-May	The following sources were submitted (TN# 250330). The remainder were unable to be found. Bundesinstitut fur Risikobewertung (BfR), 2015. The BfR has finalized its draft report for the reevaluation of glyphosate. BfR Communication No. 008/2015. February 4, 2015. Business Enterprise & Regulatory Reform (BERR). 2008. Onshore Wind: Shadow Flicker Available online at: https://webarchive.nationalarchives.gov.uk/20081013125014/ http://www.berr.gov.uk/whatwedo/energy/sources/renewables/planning/onshore-wind/shadow-flicker/page18736.html Archived October 19, 2008; accessed June 19 Cattin, R., S. Kunz, A. Heimo, G. Russi, M. Russi, and M. Tiefgraber, 2014. Wind Turbine Ice Throw Studies in the Swiss Alps. June 1, 2014. Available online at: https://www.researchgate.net/publication/228491358_Wind_turbine_ice_throw_studies_in_the_Swiss_Alps. Chief Medical Officer of Health (CMOH), 2010. The Potential Health Impact of Wind Turbines. May 2010. Available online at: http://health.gov.on.ca/en/common/ministry/publications/reports/wind_turbine/wind_turbine.pdf deRoos et al., 2005. Cancer Incidence among Glyphosate-Exposed Pesticide Applicators in the Agricultural Health Study. Published in Environ Health Perspect. 2005 Jan; 113(1): 49–54 Morgan, C., E. Bossanyi, and H. Seifert, 1998. Assessment of Safety Risks Arising from Wind Turbine Icing. April 2, 1998. Available online at: http://citeseerx.ist.psu.edu/viewdoc/download?doi=10.1.1.584.6044&rep=rep1&type=pdf. Valavanidis, 2018. Glyphosate, the Most Widely Used Herbicide. Department of Chemistry, National and Kapodistrian University of Athens,	The information submitted is incomplete. Despite the applicant indicating that they were unable to find some of the requested references, I was able to find and obtain all but one of the missing references using online searches..The one remaining reference source still needed is not readily availble online and is: Vaughn, D. J., 2006. Arsenic. Elements 2(2):71–75. This article is only avaialbe through purchase, and can be obtained at https://pubs.geoscienceworld.org/msa/elements/article-abstract/2/2/71/137684/Arsenic?redirectedFrom=fulltext, if the applicant (or its consultant) does not already own a copy of it.	Downloaded and provided (TN# 250816).

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								• Vaughn, D. J., 2006. Arsenic. Elements 2(2):71–75. Available online at: https://doi.org/10.2113/gselements.2.2.71. 2006. • Wahl, D., and P. Giguere, 2006. Wind Application Engineering, GE Energy. Ice Shedding and Ice Throw – Risk and Mitigation. April 2006. Available online at: https://www.ge.com/content/dam/gepowerpgdp/global/en_US/documents/technical/ger/ger-4262-ice-shedding-icethrow-risk-mitigation.pdf. 17. The use of pesticides (herbicides) is noted in several locations in Section 3.11.3, however only use glyphosate weed killers (herbicides) are specifically discussed. Please provide a list of all potential pesticides and herbicides that may be used for the Project. 18. Provide information on Shasta County requirements for use, storage, and handling of herbicides, including glyphosate herbicides. Are permits required from the County for use of any of the potential herbicides to be used on the site? 19. Are any other pesticides or herbicides going to be used onsite?		Greece. Published March 2018. Wahl, D., and P. Giguere, 2006. Wind Application Engineering, GE Energy. Ice Shedding and Ice Throw – Risk and Mitigation. April 2006. Available online at: https://www.ge.com/content/dam/gepowerpgdp/global/en_US/documents/technical/ger/ger-4262-ice-shedding-icethrow-risk-mitigation.pdf.		
HAZ2-11	Deficiency Letter Attachment B	Hazards and Hazardous Materials	Not specified	Not specified	BACKGROUND: Storage of large quantities of fuel onsite Fuel would be stored onsite in large quantities in above ground storage tanks (ASTs) during Project construction and Operation for vehicle and equipment refueling.	Not specified	No	26. Provide information on the volumes of fuel and numbers of fuel ASTs to be present onsite during both construction and operational activities.	25-May	This information will be provided in the SPCC Plan which will be submitted prior to construction. Above ground storage tanks would only be sited within the various temporary construction laydown areas at the site and/or at the OM facility during operation.	The informatin submitted is incomplete. Table 2-3 of the DEIR notes over 5,000 gallons of deisel fuel would be stored onsite in ASTs during construction and operation. Please identify/verify the location and potetnial volume of deisel fuel to be stored during proejct operation.	Diesel fuel would be stored at the O&M facility during operation and within construction laydown areas during construction. These locations are shown in LU-002 (TN# 250712).

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HAZ2-12	Deficiency Letter Attachment B	Hazards and Hazardous Materials	Not specified	Not specified	BACKGROUND: Storage of large quantities of fuel onsite Fuel would be stored onsite in large quantities in above ground storage tanks (ASTs) during Project construction and Operation for vehicle and equipment refueling.	Not specified	No	27. Provide a map (or GIS data) identifying the potential locations of fuel ASTs during both construction and operational activities.	25-May	This information will be provided in the SPCC Plan which will be submitted prior to construction. Above ground storage tanks would only be sited within the various temporary construction laydown areas at the site and/or at the OM facility during operation.	The information submitted is incomplete. Please identify the potential locations of laydown or work areas that woudlstore large quatities of deisel fuel during Project construction and identfy the potential location(s) where deisel fuel would be stored during proejct operation.	Diesel fuel would be stored at the O&M facility during operation and within construction laydown areas during construction. These locations are shown in LU-002 (TN# 250712).
PO-019	Deficiency Letter Matrix	Project Overview	Salyphone Ng	Appendix B (b) (2) (B)	A full-page color photographic reproduction depicting a representative above ground section of the transmission line route prior to construction and a full-page color photographic simulation of that section of the transmission line route after construction.	Not specified	No	The project proposes a short extension of the existing 230 kV transmission lines that will be routed to the switching station. The project also proposes 34.5 kV overhead lines. A full-page color photographic reproduction depicting a representative above ground section of the transmission line route prior to construction and a full-page color photographic simulation of that section of the transmission line route after construction need to be provided.	5/11/2023 and 29-Jun	Photographs of the site before and after construction were provided in Figures 3-9 in Stantec Consulting Services, Inc. (Stantec). 2021. Fountain Wind Project Visual Resources Technical Report. March 5 (TN# 248320-13). A full-site photograph of the entire 4500-acre site is not possible. However, see response to PO-008 for a full-page color photographic reproduction of what the Project could look like after construction. The short transmission interconnection to the switching station will not be visible in public views, and thus is not required to be analyzed in a CEQA document. The 34.5kV collector lines are not transmission lines.	There is no response above to PO-008, as noted. See Visual Resources Disposition responses for specific outstanding items for that technical analysis.	Applicant provided before-and-after full site simulations of Project conditions via Kiteworks on June 9, 2023 (TN# 250568).

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SOC-001	Deficiency Letter Matrix	Socioeconomics	Allen Kaufman	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.	TN 248292-2: Economic and Public Revenue Impact Study; pages 2-4 (Tables 4 and 5) TN 248293-2: CEQA Staff Report; pages 1-3, 8-10 TN 248288-17L: DEIR Utilities and Service Systems; page 12	No	Please provide the cumulative impact assessment for population/housing, recreation, and public services. A discussion of the cumulative impacts for Utilities and Service Systems has been provided. Please provide similar detail for cumulative analyses of other socioeconomic sections (i.e., population/housing, recreation, and public services) based on an up-to-date cumulative scenario.	6/2/2023 and 29-Jun	As discussed in Section 3.1.4, Environmental Considerations Unaffected by the Project or Not Present in the Project Area,of the EIR, the project would have no impact on population and housing, public services, or recreation. Where the project would cause no impact to a resource, it would not cause or contribute to any cumulative impact to such resources. Therefore, there would be no cumulative impact to population and housing, public services, or recreation because the Project does not propose to add permanent population; rather, the workers coming into the region for construction will be in the area only temporarily and Project operations will employ up to 12 permanent workers. The Applicant was able to identify a single project subject to CEQA on the Shasta County website (Crystal Creek Aggregate Expansion Project). The Applicant requested additional information from Shasta County in an email to Paul Hellman at the Shasta County Planning Division on April 18, 2023 (TN# 250436). No response was received.	TN 248288-3 (Section 3.1.4 of the EIR, Environmental Considerations Unaffected by the Project or Not Present in the Project Area) is not an adequate response to the Warren-Alquist Act Siting Regulation Appendix B (g)(1). The DEIR is outdated and based on baseline assumptions to a previous version of the Project. Per the Warren-Alquist Act Siting Regulation Appendix B (g)(1), the Applicant must "…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." TN250344 (Socioeconomics response memo) states there will be a peak of 200 workers/month during the construction phase. Activities during this period may change the demands on public services to the area. TN250344 also states, "The portion of the construction and operational workforce which would be nonlocal is unknown at this time and is dependent on the available local workforce at the time of construction and operations." The specific information still needed includes the following: - A discussion of the cumulative impacts based on the most up to date assumptions in the current/finalized (i.e, number of turbines, site configuration, site boundary) Project description. - Documentation of follow-up attempts (i.e., attempts to outreach by phone), if any, to reach Paul Hellman of Shasta County Planning. Please provide Mr. Hellman's contact information.	The Project would have no impact, and therefore no cumulatively considerable impact, on population and housing, public services, or recreation at either the 72-turbine layout or the 48-turbine layout because the individuals who will be working on the project are either already based in Shasta County, or, will be coming into the region for construction and will be in the area only temporarily. The number of construction workers temporaily in the area is not expected to have any significant impact on housing. They will not displace permanent residents and are instead likely to stay in transient housing such as hotels, motels and/or recreational vehicles in campgrounds, These temporary construction workers are not likely to create signficiant (the threshold under CEQA) new demand for publlic services in terms of fire, police, or medical serices. New permanent employees (up to 10) are also not likely to create a significant new demand for public services. There is also no evidence that baseline socio-economic conditions related to housing, population and public services have significantly changed since the County prepared its EIR. The Applicant request that the CEC staff provide evidence that baseline socioeconomic conditions are "outdated" as stated in the data request. The Applicant's attempts to contact Mr. Hellman were provided as TN# 250436. Should CEC staff want additional confirmation from Shasta County, the Applicant has also provided CEC staff with contact information for the County planning staff (including emails and telephone numbers) for purposes of CEC coordination.

Fountain Wind Project (23-OPT-01) Responses to CEC Data Requests

Data Request Identifier	Request Source	Topic	Reviewer	Siting Regulations	Information	Opt-In Page Number And Section Number	Original Determi-nation of Adequacy	Information Required To Make OPT Conform With Regulations	Response Date	Applicant Response No. 1	CEC Disposition 1	Applicant Response No. 2
SOC-013	Deficiency Letter Matrix	Socioeconomics	Allen Kaufman	Appendix B (g) (7) (B) (v)	The potential impacts, including additional costs, on utilities (gas, water, and waste) and public services, including fire, law enforcement, emergency response, medical facilities, other assessment districts, and school districts. Include response times to hospitals and for police, and emergency services. For projects outside metropolitan areas with a population of 500,000 or more, information on schools shall include project-related enrollment changes by grade level groupings and associated facility and staffing impacts by school district during the construction and operating phases;	TN 248288-3: DEIR Intro Environmental Analysis; pages 22-26 TN 248322: Executive Summary and Project Description; page 15 TN 248288-17: DEIR Utilities and Service Systems; pages 3.15-2, 3.15-9	No	Please provide current response times to hospitals and for police and emergency services. Please provide a discussion with level of detail similar to that provided for utilities for the response times for fire protection, law enforcement, and medical facilities. Please include a discussion of the potential impacts.	6/2/2023 and 29-Jun	Shasta County Fire and Sheriff did not respond to a request for response times when they were contacted in May 17, 2023. Response times for Fire/EMS was approximately 30 minutes in outlying areas of the county (https://www.shastacounty.gov/sites/default/files/fileattachments/shasta_county_fire/page/4339/2021_annual_report.pdf).	The response is insufficient for my analysis purposes. The link provided is not an adequate response to the Warren-Alquist Act Siting Regulation Appendix B (g)(7)(A)(v). The link provided to the 2021 Annual Report states that ambulance response time is approximately 30 minutes in outlying areas of the county. The specific information still needed includes the following data for public safety analyses: -Current response times for police/sheriff services. -Current response times for fire services. -Clarification on whether the 2021 Annual Report for Fire/EMS is the most recent document. If a 2022 Annual Report is now available, please provide it. -If there are Annual Reports for medical/hospital services in Shasta County, and from the Shasta County Sheriff's Offices, please provide the most recent documents.	On June 19, 2023, the Applicant searched for publicly available information on the County's website, including respective websites for the Fire Department and Sheriff's Office, regarding response times for fire, police, and emergency services. Neither the County nor the Fire and Police Departments provide public documents discussing response times. The Fire Department provides a link to its 2021 Annual Report; however, more recent versions are not available. The 2021 Annual Report describes department facilities and incidents, but it does not provide average response times or response time goals. CALFIRE's 2022 Shasta Trinity Unit Strategic Fire Plan also does not provide average response times for fire services. According to the Fire Department's website, the Fire Department is responsible for all medical aid incidents outside of incorporated cities and districts in Shasta County. In 2021, approximately one-third of the emergency calls required a response to outlying areas of the County; ambulance response time in these areas was approximately 30 minutes. More recent information regarding emergency service response times is not available. The Sheriff's Office does not provide an annual report or other similar publications discussing response times. The County itself did not describe specific response times for the local fire agencies serving the area in its EIR for the Project. Other County environmental documents for pending or past projects similarly do not provide general response times for fire, police, or emergency services. Rather, to the extent it is provided, response time information was received from the respective service by email correspondence. On May 17, 2023, the Applicant contacted the Fire Department and Sheriff's Office for relevant information but has not received a response. Should CEC staff want additional confirmation from Shasta County, the Applicant has also provided CEC staff with contact information for the County planning staff (including emails and telephone numbers) for purposes of CEC coordination.

WILDFIRE-01	Deficiency Letter Attachment B	Wildfire	Not specified	Not specified	Multiple citations are provided for the DEIR wildfire setting and effects information and potential impacts related to wildfire as related to the Project. However, many of the references cited are not readily available for review to verify the information provided.	Not specified	No	Please provide copies of the following references that are not readily available online (for many the online link does not work). • Anderson, H. E., 1982. Aids to Determining Fuel Models for Estimating Fire Behavior. Available online at: https://www.fs.fed.us/rm/pubs_int/int_gtr122.pdf. • California Department of Forestry and Fire Protection (CAL FIRE), 2019a. Communities at Risk List [filtered to include only Shasta County]. Available online at: http://osfm.fire.ca.gov/fireplan/fireplanning_communities_at_risk?filter_field=county_name&filter_text=Shasta. Accessed May 23, 2019. • CAL FIRE and Shasta County Fire, 2018. Shasta-Trinity Unit 2018 Strategic Fire Plan. Available online at: http://cdfdata.fire.ca.gov/pub/fireplan/fpupload/fpppdf1624.pdf. May 10, 2018. • California Public Utilities Commission (CPUC), 2020. CPUC Fire Safety Rulemaking Background. Available online: https://www.cpuc.ca.gov/FireThreatMaps/ Accessed July 1, 2020. • CPUC, 2017a. Decision 17-12-024- Order Instituting Rulemaking to Develop and Adopt Fire Threat Maps and Fire-Safety Regulations. Rulemaking 15-05-006. Issued December 21, 2017. • Dupras, D., 1997. Geology of Eastern Shasta County. California Geological Survey. Map. Scale 1:100,000. • Milman, O., 2018. “Wildfire Smoke: Experts Warn of ‘Serious Health Effects’ Across Western US.” The Guardian, August 2, 2018. Available online at: https://www.theguardian.com/world/2018/aug/02/wildfire-events-air-quality-health-issues-in-western-us. Accessed August 23, 2019. • National Association of State Foresters, U.S. Bureau of Land Management, U.S. Fish and Wildlife Service, National Park Service, Bureau of Indian Affairs, U.S. Department of Agriculture, and National Wildfire Coordinating Group (National Association of State Foresters et al.), 2003. Interagency Strategy for the Implementation of Federal Wildland Fire Management Policy. June 20, 2003. Available online at: https://www.sierraforestlegacy.org/Resources/Community/SmokeManagement/AirQualityPolicy/FedWldFireMgmtPolicy.pdf. • National Oceanic and Atmospheric Administration (NOAA), 2018. The Impact of Wildfires on Climate and Air Quality. Available online at: https://www.esrl.noaa.gov/csd/factsheets/csdWildfiresFIREX.pdf. Accessed June 24, 2020. • National Wildfire Coordinating Group,	5/25/2023 and 29-Jun	The following sources were submitted. The remainder were unable to be found. (TN# 250321) Anderson, H. E., 1982. Aids to Determining Fuel Models for Estimating Fire Behavior. Available online at: https://www.fs.fed.us/rm/pubs_int/int_gtr122.pdf. (TN# 250323). CAL FIRE and Shasta County Fire, 2018. Shasta-Trinity Unit 2018 Strategic Fire Plan. Available online at: http://cdfdata.fire.ca.gov/pub/fireplan/fpupload/fpppdf1624.pdf. May 10, 2018. (TN# 250322). California Public Utilities Commission (CPUC), 2020. CPUC Fire Safety Rulemaking Background. Available online: https://www.cpuc.ca.gov/FireThreatMaps/ Accessed July 1, 2020. [available at link only] National Association of State Foresters, U.S. Bureau of Land Management, U.S. Fish and Wildlife Service, National Park Service, Bureau of Indian Affairs, U.S. Department of Agriculture, and National Wildfire Coordinating Group (National Association of State Foresters et al.), 2003. Interagency Strategy for the Implementation of Federal Wildland Fire Management Policy. June 20, 2003. Available online at: https://www.sierraforestlegacy.org/Resources/Community/SmokeManagement/AirQualityPolicy/FedWldFireMgmtPolicy.pdf. (TN# 250339). National Oceanic and Atmospheric Administration (NOAA), 2018. The Impact of Wildfires on Climate and Air Quality. Available online at: https://www.esrl.noaa.gov/csd/factsheets/csdWildfiresFIREX.pdf. Accessed June 24, 2020. (TN# 250338). PG&E, 2019. Pacific Gas and Electric Company Amended 2019 Wildfire Safety Plan. February 6, 2019. Amended February 14, 2019 and April 25, 2019. Available online: https://www.cpuc.ca.gov/SB901/ (TN# 250336). Stantec and Pacific Wind Development, LLC, 2018. Environmental Initial Study,	The information submitted is incomplete. Despite the applicant indicating that they were unable to find more than half of the requested references, I was able to find and obtain all but a few of the missing references using online searches. One of the submitted references was not the correct file, but I was albe to find the correct file online. The 2018 PG&E CERP ws not avialbe online but I ws able to find the 2019 and 2023 PG&E CERPs. The remaining references are not easily availble online or are not available online and need to either be submitted or another source for the same information needs to be submitted. The remaining references (with my notes on availability) are: • Dupras, D., 1997. Geology of Eastern Shasta County. California Geological Survey. Map. Scale 1:100,000. This reference is actually Plate 1A of the Mineral land classification of alluvial sand and gravel, crushed stone, volcanic cinders, limestone, and diatomite within Shasta County, California, California Geological Survey OFR-97-03. {late 1C is the legend. The document is currently Out of Print. Can be viewed, but not saved or printed, at https://ngmdb.usgs.gov/Prodesc/proddesc_44915.htm. • Sacramento Bee, 2019. “California’s largest wildfire was caused by a hammer, Cal Fire says.” June 6, 2019. This article from the Bee requires a subscription to the Sacramento Bee to access. • Shasta County Fire Department, 2018. Email from James Zanotelli to Bill Walker on February 1, 2018. Please provide a copy of this email, the person who wrote the EIR Wildfire section should have it and it should be part of the EIR administrative record.	Your comments on the remaining references are noted. The email from James Zanotelli to Bill Walker is included in the Shasta County Scoping Report on p. 196 (TN# 248301).

									2015. National Fire Danger Rating System Fuel Model. Available online at: https://www.nwcg.gov/sites/default/files/stds/standards/nfdrs-fuel-model_v1-0.htm. Accessed March 30, 2020. • Pacific Gas and Electric Company (PG&E), 2018. Company Emergency Response Plan. October 31, 2018. • PG&E, 2019. Pacific Gas and Electric Company Amended 2019 Wildfire Safety Plan. February 6, 2019. Amended February 14, 2019 and April 25, 2019. Available online: https://www.cpuc.ca.gov/SB901/ • PG&E, 2017. Appendix D. Fire Prevention Plan- Electric Annex to the CERP. September 30, 2017. • Sacramento Bee, 2019. "California's largest wildfire was caused by a hammer, Cal Fire says." June 6, 2019. • Shasta County, 2016. Shasta County Communities Wildfire Protection Plan 2016. Available online at: http://www.westernshastarcd.org/Docs/ShastaCWPPs-2016.pdf. • Shasta County, 2017. Shasta County Development Standards–Chapter 6, Fire Safety Standards. Available online at: https://www.co.shasta.ca.us/docs/libraries/public-works-docs/devstdmanual/sc-development-standards-manual.pdf. Revised June 27, 2017. • Shasta County, 2018. General Plan Element 5.0, Public Safety Group. Available online at: https://www.co.shasta.ca.us/docs/libraries/resource-management-docs/docs/54firesafety.pdf?sfvrsn=204962bd_0. Updated December 11, 2018. • Shasta County Fire Department, 2018. Email from James Zanotelli to Bill Walker on February 1, 2018. • Shasta County and City of Anderson, 2017. Shasta County and City of Anderson Multi-Jurisdictional Hazard Mitigation Plan. Available online at: https://www.co.shasta.ca.us/docs/libraries/public-works-docs/hmp-documents/shasta-county-hazard-mitigation-plan-november-2017.pdf?sfvrsn=b54ee689_2. November 16, 2017. • Stantec and Pacific Wind Development, LLC, 2018. Environmental Initial Study, Fountain Wind Project Pacific Wind Development, LLC. Prepared in co-ordination with and for Shasta County Department of Resource Management Planning Division. June 28, 2019. Available online at: https://www.co.shasta.ca.us/docs/libraries/resource-managementdocs/projects/fountain-wind-project/initial-study/initial-study.pdf. • U.S. Forest Service (USFS), 2015. The 2010 Wildland-Urban Interface of the		Fountain Wind Project Pacific Wind Development, LLC. Prepared in co-ordination with and for Shasta County Department of Resource Management Planning Division. June 28, 2019. (TN# 248297-2) [only available at link] Shasta County, 2016. Shasta County Communities Wildfire Protection Plan 2016. Available online at: http://www.westernshastarcd.org/Docs/ShastaCWPPs-2016.pdf. (TN# 250337). Shasta County and City of Anderson, 2017. Shasta County and City of Anderson Multi-Jurisdictional Hazard Mitigation Plan. Available online at: https://www.co.shasta.ca.us/docs/libraries/public-works-docs/hmp-documents/shasta-county-hazard-mitigation-plan-november-2017.pdf?sfvrsn=b54ee689_2. November 16, 2017. (TN# 250335). U.S. Forest Service (USFS), 2015. The 2010 Wildland-Urban Interface of the Conterminous United States. June 2015. Available online: https://www.fs.fed.us/nrs/pubs/rmap/rmap_nrs8.pdf Accessed June 17, 2020. (TN# 250334). WRCC, 2020b. Burney, California Total of Precipitation (Inches), Period of Record 1948 to 2015. Available online at: https://wrcc.dri.edu/WRCCWrappers.py?sodxtrmts+041214+por+por+pcpn+none+msum+5+01+F. Accessed June 24, 2020.		

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								Conterminous United States. June 2015. Available online: https://www.fs.fed.us/nrs/pubs/rmap/rmap_nrs8.pdf Accessed June 17, 2020. • U.S. Forest Service, U.S. Bureau of Land Management, Bureau of Indian Affairs, U.S. Fish and Wildlife Service, and National Park Service (USFS et al.), 2009. Guidance for Implementation of Federal Wildland Fire Management Policy. February 13, 2009. Available online at: https://www.nifc.gov/policies/policies_documents/GIFWFMP.pdf. • WRCC, 2020b. Burney, California Total of Precipitation (Inches), Period of Record 1948 to 2015. Available online at: https://wrcc.dri.edu/WRCCWrappers.py?sodxtrmts+041214+por+por+pcpn+none+msum+5+01+F. Accessed June 24, 2020.				

Fountain Wind Project (23-OPT-01) Responses to CEC Data Requests

Data Request Identifier	Request Source	Topic	Reviewer	Siting Regulations	Information	Opt-In Page Number And Section Number	Original Determi-nation of Adequacy	Information Required To Make OPT Conform With Regulations	Response Date	Applicant Response No. 1	CEC Disposition 1	Applicant Response No. 2
WILDFIRE-02	Deficiency Letter Attachment B	Wildfire	Not specified	Not specified	DEIR Section 3.16.3.1 b) indicates “the Project is not intended for and would not be used for human occupation; therefore, no occupants would be exposed to increased risks associated with wildfire”, however there will be up to 400 workers onsite during construction and up to 12 full-time employees onsite during operation.	Not specified	No	Provide a discussion on the potential for Project construction and operation to increase risks associated with wildfires to workers, including impacts of loss, injury or death from a wildfire or adverse effects due to inhalation of wildfire pollutants.	5/25/2023 and 29-Jun	The Shasta County DEIR and specialist opinion concluded that there was low risk of wildfire ignition resulting from Project construction. Nevertheless, the Applicant plans to undertake fire prevention practices during construction, such as preparation of a project-specific Fire Prevention Plan (MM 3.16-2a), which mitigates risks to onsite workers and impacts of loss related to wildfire. The FPP will detail the standard fire prevention techniques will be observed during construction, including a prohibition on hot work during high fire risk weather. For details see Wildfire Effects Review memorandum (TN#248297-3).	The information submitted is incomplete. MM 3.16-2a requires and provides details for the Fire Prevention Plan to apply during constructin, operation, and maintetnance, however most of the details apply prevention of wildfire and to the construction phase. Insuffiecient detail is included in familiarity/training of operational and maintentance workers with the FPP, manyof the listed fire prevention details are only specifically called out for operation, especially those related to vehicles and fire suppression equipment and red flag warnings, but should also occure during operationand/or mainteneance. The information submitted does not address the comment regarding wildfire hazards to workers nor adverse effects of inhalation of wildfire pollutants on workers.	In the event of a wildfire onsite or near the project site, workers have the potential to be directly impacted. The most common wildfire-related health effect is smoke inhalation. According to the National Institute for Occupational Safety and Health, health effects known or suspected to be caused by exposure to wildfire smoke include: - Symptoms such as eye irritation, sore throat, wheeze, and cough, - Asthma and chronic obstructive pulmonary disease (COPD) exacerbations, - Bronchitis and pneumonia, - Adverse birth outcomes, and - Cardiovascular (heart and blood vessel) outcomes. The Applicant will ensure that workers are protected from wildfire smoke by adhering to CCR Title 8 SS 5141.1 and other standard safety practices outlined in the FPP or other operations-phase fire safety plan. In the event of an onsite wildfire during construction or operations, all workers would be promptly evacuated, thereby minimizing their exposure to wildfire pollutants. In the event of an offsite wildfire during construction or operations, onsite air quality will be monitored by a designated site supervisor. In the event the PM2.5 Air Quality Index rises to 151 or greater as measured by a standard source (e.g., EPA, CARB), workers will be instructed to remain inside vehicles or indoor facilities, or will relocate to an offsite area, where the air quality index is at a healthy level. In addition, the following standard safety practices would be implemented: - Relocating or rescheduling work tasks to smoke-free or less smoky areas or times of the day; - Reducing levels of physical activity when possible, especially strenuous and heavy work; and - Requiring workers to take frequent breaks in places that are free from smoke.

Fountain Wind Project (23-OPT-01) Responses to CEC Data Requests

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WILDFIRE-03	Deficiency Letter Attachment B	Wildfire	Not specified	Not specified	DEIR Section 3.16.3.1 a) includes discussion of potential hazards due to the wind turbine towers interfering with firefighting operations in the event of a local wildfire and a mitigation measure (MM 3.16-1b) to reduce the risk. This measure has no way of verifying completion nor does it require any coordination with CALFIRE staff regarding this information.	Not specified	No	Provide a discussion on timing and verification of transmittal of data regarding tower locations to CALFIRE, and a discussion of whether any coordination would occur before or during fires with CALFIRE regarding aerial firefighting in the vicinity of the turbines.	5/25/2023 and 29-Jun	The following mitigation measure outlines timing of transmittal of data regarding tower locations to CAL FIRE and contains a mechanism for CEC to verify compliance with requirement to transmit information: Mitigation Measure 3.16-1b: Pre-Construction Coordination with CAL FIRE: Prior to issuance of construction permits by the CEC, the Applicant shall provide evidence that it has submitted GIS files or other maps of the Project layout to CAL FIRE to facilitate aerial fire-fighting planning. The Applicant shall notify CAL FIRE of any changes to the Project layout or any maintenance that would require the use of helicopters or the use of equipment not previously identified on maps provided to CAL FIRE that could present a new, previously unidentified vertical obstacle to aerial firefighting.	The information submitted is incomplete. The submitted revised MM 3.16-1b provides timing and verification of submittal of information regarding tower locations to CALFIRE and addes submittal to CEC. However, it does not address the part of the comment about coordination with CALFIRE regarding aerial firefighting during fires in the Project vicinity.	Yes, The Applicant will coordinate with CALFIRE before and during fires. The Applicant would designate a “Risk Manager” to be available on-site whenever construction activities are in progress. The Risk Manager would have oversight authority and would be the point of contact for CALFIRE / Shasta County Fire Department ("SCFD") during any incident. Prior to construction, the Applicant would provide to Cal FIRE / SCFD the telephone number of the control center that has the ability to shut down the turbines. When the control center is notified by CALFIRE / SCFD of a fire, the control center would immediately shut down any turbines that could be detrimental to the mitigation of an incident located in proximity to the turbines, as directed by the incident commander.

Fountain Wind Project (23-OPT-01) Responses to CEC Data Requests

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WILDFIRE-05	Deficiency Letter Attachment B	Wildfire	Not specified	Not specified	DEIR Section 2.4.5 (Site Preparation and Construction) and the Application for Opt-in Certification Executive Summary and Project Description Section 4.4.1.3 both mention that emergency responders would be notified 24 hours in advance of blasting, that all blasting activities would be conducted in compliance with applicable federal, state, and local laws, and appropriate safety and environmental protection measures would be implemented, including weather restrictions in regards to wildfire risk. A minimal discussion of blasting as a potential fire source is in Section 3.16.3.1 b), but no procedures regarding blasting or blasting fire safety measures are included in the mitigation measure related to Fire Safety (3.16-2a).	Not specified	No	Provide a discussion or listing of procedures to be added to MM 3.16-2a specifically designed to reduce the potential for ignition of wildfire by blasting activities.	5/25/2023 and 29-Jun	Mitigation Measure 3.12-2: Best Management Practices for Blasting outlines in detail practices that will be implemented to prevent ignition of wildfire by blasting.	The informatin submitted is incomlplete. The reponse refences MM 3.12-2 as containing detailed practices to prevent wildfire due to blasting does require that a blasting plan be prepared and that it include fire prevention prodcedures, however the details of this measure primarily addesses potetnial damage to nearby dwellings and potential environmental contamination of water resources. There some safety details related to use and storage of explosives, but there are no details that specifially indicate they are to prevent ignition of wildfire by blasting. The only text that discusses wildfire in the Wildfire section is one sentence that states 'Additionally, construction activities that could result in sparks, such as blasting, welding, or grinding, have a greater likelihood of creating a source of ignition'. Ignition of wildfire due to blasting activities is not discussed in the Wildfire section impacts nor any of the mitigation measures.	The Applicant will minimize the potential for wildfire ignition during blasting onsite by using licensed professional blasters, adhering to all relevant regulations, and implementing standard fire safety BMPs. The Applicant will contract a qualified, experienced, and licensed blasting contractor that will perform blasting using current and professionally accepted methods, products, and procedures to maximize safety and minimize the potential for wildfire ignition during blasting operations. Blasting procedures will be carried out according to and in compliance with applicable laws. The Federal Occupational Safety and Health Administration and numerous state and local jurisdictions regulate the use of explosives. The Federal Bureau of Alcohol, Tobacco, and Firearms regulates explosives storage and commerce under the Organized Crime Control Act of 1970, Title XI (Public Law 91-452). The U.S. Department of Transportation also has laws pertaining to the storage of explosives, as well as the packaging, labeling, materials compatibility, driver qualifications, and safety of transported explosives. All blasting work will be conducted in compliance with the Project Fire Prevention Plan and all pertinent fire prevention laws and regulations. Special precautions will be taken to minimize this risk, including but not limited to: - Prohibiting ignition devices within 50 feet of an explosives storage area; - Properly maintaining magazine sites so that they are clear of fuels and combustible materials, are well ventilated, and are fire-resistant; - Protecting magazines from wildfires that could occur in the immediate area; - Posting fire suppression personnel at the blast site during high fire danger periods; and - Prohibiting blasting during extreme fire danger periods. - Refueling of vehicles carrying explosives will be avoided. - Smoking will be prohibited during the loading, transporting, or unloading of explosives. - Vehicles carrying explosives will not be parked or left unattended except in designated parking areas with approval of the State Fire Marshall.

WILDFIRE-06	Deficiency Letter Attachment B	Wildfire	Not specified	Not specified	Mitigation measure 3.16-2b in DEIR Section 3.16.3.1 b) indicates that the turbines shall be equipped with fire detection and prevention technology compatible with the manufacturer's operating requirements and technology for fire detection and suppression within turbines. The mitigation measure also includes specific design requirements as related to fire, including fire detection and warning systems, and automatic fire extinguishing systems in the nacelle of each wind turbine, and shut down of the turbine if an out-of-range condition is reported.	Not specified	No	62. Provide a description of the automatic fire extinguishing systems for the nacelle. 63. Provide information on timing of and of inspection activities that would occur in the event of an out-of-range notification and shut down of a turbine. 64. Provide a discussion of activities required to restart a turbine after a shutdown to ensure there is no future chance of fire or sparks. 65. Provide procedures that would occur in the event of a turbine/nacelle fire. What procedures would occur in the event the automatic fire suppression does not fully extinguish a fire?	5/25/2023 and 29-Jun	62. See fire suppression system specifications (TN# 250320). 63. Any error codes, alarms or alerts generated by the WTG related by the Fire Suppression System would be investigated as quickly as possible by the site operations and maintenance team. Based on initial WTG data, additional proactive measures may be taken by either the site operations and maintenance team or by the Remote Operations Control Center (ROCC). 64. Based on the type of Fire Suppression System shutdown (in the event of a fire response, a converter module failure, or if a hose needed replacement) the site operations and maintenance team would appropriately replace, inspect, and test the equipment before restarting the turbine. In addition, the site operations and maintenance team would create a Component Inspection Report (CIR) to keep on file that delineates the nature of the shutdown and the reactive measures taken. 65. In the unlikely event of a turbine/nacelle fire the turbine would cease operations, be disconnected from the site electrical system, and the ROCC / site operations and maintenance team would immediately implement the appropriate measures outlined in the site Emergency Response Plan (I.e. notifying CALFIRE and other appropriate agencies and taking the appropriate reactive measures). In addition to following all the procedures outlined in the Emergency Response Plan, once any turbine/nacelle fire would be deemed under control by the appropriate government agency, the Original Equipment Manufacturer (OEM) would initiate their Serious Incident (SI) protocol in conjunction with the site operations and maintenance team. The SI protocol would include setting a Restricted Approach Boundary to limit access and allow the OEM SI team to initiate the appropriate evaluation and communication protocols, including meeting with appropriate parties to summarize the events to date and the forthcoming project plan, within 48 hours of the incident. The SI team will then coordinate an all safe	The information submitted is fully responsive, however I would like a clarification for some of the language in the response to number 63 - please clarify what the actual timeline is for inspection activities from the statement 'would be investigated as quickly as possible'. Would this be immediately, within a few hours, same day, later??? Is there a procedure that requires inspection for out0of-range notifications that requires inspectin within a certain time period?	All operational issues with WTGs are evaluated by the local on-site operational staff with support by the ROCC team. The site operations and maintenance team would respond to any error codes, alarms, or alerts immediately and would seek resolution as soon as is reasonably possible. This response time incudes safe access to the WTGs due to weather, site conditions, and the availability of the nearest site operations team member if the error code, alarm, or alert were to occur after hours.

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										approach, business recovery, and investigation efforts through the life of the project until the turbine is safely returned to service and all investigative efforts are complete.		
WR-007	Deficiency Letter Matrix	Water Resources	Ackerman Abulaban	Appendix B (g) (14) (B)	A detailed description of the hydrologic setting of the project. The information shall include a narrative discussion and on maps at a scale of 1:24,000 (or appropriate scale approved by staff), describing the chemical and physical characteristics of the following nearby water bodies that may be affected by the proposed project:	Figure 3.12-1 Page: 3.12-3	No	"Surface Waters and Hydrology" figure has an estimated scale of 1":1.56 mi., or 1:98842 If practical, provide map in proper scale (1:24,000) or better.	5/25/2023 and 29-Jun	Figure provided (TN# 250303).	The figure (TN# 250303) submitted is incomplete. Although a scale of 1:24,000 may not be practical to depict the subject area, the scale should be identified.	Revised figure provided (TN# 250814). Scale is 1:24,000.

WR2-01	Deficiency Letter Attachment B	Water Resources	Not specified	Not specified	Reference: Title 20 CCR Div. 2 Ch. 5 App. B, Appendix B Information Requirements for an Application	Not specified	No	37. Per Appendix B, (g) (14) (B), please reissue figure 3.12-1 Surface Waters and Hydrology with a map scale of 1:24,000. 38. Per Appendix B, (g) (14) (B) (v), please provide a list and map of active groundwater wells within ½ mile of the proposed project, since one alternative for water supply is groundwater extraction. Ensure the map scale is 1:24,000. 39. Per Appendix B, (g) (14) (C) (ii), please provide information on the physical and chemical characteristics of source and discharge water. Data should include both organic and inorganic constituents before and after treatment and should account for seasonal variation for source water. In addition, please provide data documentation. 40. Per Appendix B, (g) (14) (C) (v) and (g) (14) (C) (vi), although the application does include correspondence with the Burney Water District documenting discussion of the ability to provide water, please provide a formal "letter of intent" or "will-serve letter" from the water purveyor (assumed to be the Burney Water District). 41. Per Appendix B, (g) (14) (C) (viii), although the application does state that there is no wastewater infrastructure that serves the project site, please provide a permit for septic treatment of water discharge as the identified alternative. 42. Per Appendix B, (g) (14) (D) (viii) and (g) (14) (D) (iv), please provide text, diagrams, and calculations regarding storm water control design. 43. Per Appendix B, (g) (14) (E) (ii), since the water supply alternatives include groundwater extraction, please provide an estimation of aquifer drawdown of active groundwater wells within ½ mile of the proposed project based on modeling conducted by a professional geologist. The analysis should include the migration of any contaminants and changes in physical and chemical groundwater conditions. 44. Per Appendix B, (g) (14) (iv), please provide an explanation why a "zero liquid discharge process" was not incorporated into the wastewater design for the project. 45. Per Appendix B, (g) (14) (vii), please provide calculations that support a discussion of fresh water supply cumulative impacts. 46. Per Appendix B, (i) (1) (A), please provide 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	5/25/2023 and 29-Jun	37. Please see response to WR-012 38. Please see response to WR-012 39. Please see response to WR-014 40. Please see response to WR-015 41. Permit application will be provided prior to construction when the Project's final design is available. 42. Stormwater control designs will be included in the SWPPP which will be submitted prior to construction. 43. Please see response to WR-026 44. Please see response to WR-028 45-49. Please see LORS Consistency Matrix (TN# 249636), Permit Table (TN# 249533) and General Plan Consistency Table (TN# 249635).	Per Item 37, The figure (TN# 250303) submitted is incomplete. Although a scale of 1:24,000 may not be practical to depict the subject area, the scale should be identified. Other information submitted to be sufficient.	Revised figure provided (TN# 250814). Scale is 1:24,000.

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								each law or standard during both construction and operation of the facility is discussed. 47. Per Appendix B, (i) (1) (B), please provide tables that identify each agency with jurisdiction to issue applicable permits and approvals, or to enforce identified laws, regulations, standards, and adopted local, regional, state, and federal land use plans. 48. Per Appendix B, (i) (2) please provide 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. 49. Per Appendix B, (i) (3), please provide 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.				

Fountain Wind Project (23-OPT-01) Responses to CEC Data Requests

Data Request Identifier	Request Source	Topic	Reviewer	Siting Regulations	Information	Opt-In Page Number And Section Number	Original Determi-nation of Adequacy	Information Required To Make OPT Conform With Regulations	Response Date	Applicant Response No. 1	CEC Disposition 1	Applicant Response No. 2
WR2-02	Deficiency Letter Attachment B	Water Resources	Not specified	Not specified	Although Section 3.12.1.3 of the Opt-In application (TN 248288-14) addresses the United States Army Corp of Engineers (USACE) jurisdiction to regulate the discharge of dredged fill material to waters of the United States (U.S.) under Sections 401 and 404 of the Clean Water Act (CWA), the jurisdiction of the California State and Regional Water Boards was not recognized under Sections 13260 and 13376 of the California Water Code (CWC). As stated by the Central Valley Regional Water Quality Control Board (CVRWQCB) in their letter of January 27, 2023, entitled Comments on AB 205 Opt-In Application for Certification, CEC Docket Number 23-OPT-01, Fountain Wind, LLC, Fountain Wind Project, Shasta County (Comment Letter), some wetlands and waters are considered geographically isolated from the navigable waters covered under the CWA. If the USACE determines that some wetlands and waters are geographically isolated, regulatory authority would be assigned to the CVRWQCB.	Not specified	No	50. Please include text in Section 3.12.1.3 of the Opt-In application describing why the requirements of Sections 13260 and 13376 of the CWC don't apply to the Fountain Wind project.	5/25/2023 and 29-Jun	The Applicant plans to submit NOIs for applicable permits through the CVRWQCB, including an Industrial General Permit for industrial stormwater discharges for the Project's concrete batch plant.	The applicant's responses do not address the request in Item 50 to include text in Section 3.12.1.3 of TN#248288-14 describing why the requirements of Sections 13260 and 13376 of the California Water Code (CWC) don't apply to the Fountain Wind project.	Sections 13260 and 13376 of the California Water Code address Waste Discharge Requirements approved by the RWQCB for impacts to Waters of the State. The Project is subject to Sections 13260 and 13376 of the California Water Code to the extent that any Waters of the State on the Project site do not qualify as Waters of the United States subject to regulation by USACE. The Applicant anticipates that applications for Section 404 Permits and Section 401 Water Quality Certifications/Waste Discharge Requirements will be submitted to USACE and the RWQCB prior to CEC action. To the extent that impacts to any jurisdictional waters on the Project site are not covered by an approved Section 404 Permit, the RWQCB may issue Waste Discharge Requirements pursuant to the combined application.
WR2-03	Deficiency Letter Attachment B	Water Resources	Not specified	Not specified	The second (A) row in Section 14 of the Appendix B Opt-In Crosswalk Matrix [TN 248321] states in the Data Response column that construction and industrial discharges are not applicable since "This project will not discharge industrial or construction waste". This seems contrary to the description of the project in the general Opt-In application and contradicts the discussion of the General Construction NPDES permit in Section 3.12.1.3 (TN 248288-14).	Not specified	No	51. Please clarify why construction and industrial wastewater discharge do not apply to this project per the statement in the Data Response column of the second (A) row in Section 14 of the Appendix B Opt-In Crosswalk Matrix.	5/25/2023 and 29-Jun	The Project will not discharge wastewater into surface water. Wastewater generated at the O&M Facility will be stored in an onsite septic tank which will be serviced by a private vendor. Wastewater from portable toilets will also be serviced by a private vendor. A NPDES permit is not required for an onsite septic system or portable toilets because no wastewater is being discharged to surface waters. The Applicant plans to submit NOIs for applicable permits through the CVRWQCB, including an Industrial General Permit for industrial stormwater discharges for the Project's concrete batch plant.	If the septic tank is to be used as a receptacle only without a leach field, this should be included in the application. Details on the service provider and how the content will be disposed should also be included.	See response to data request WR2-06.

Fountain Wind Project (23-OPT-01) Responses to CEC Data Requests

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WR2-04	Deficiency Letter Attachment B	Water Resources	Not specified	Not specified	Figure 3.12-1 Surface Water and Hydrology included Section 3.12.1.2 of the Opt-In application (TN 248288-14) appears to reflect a previous version of the proposed project. As an example, Figure 3.12-1 appears to include (75) wind turbines, while the current proposed project only includes up to (48) per the Fountain Wind Executive Summary and Project Description (TN-248322).	Not specified	No	52. Please provide an updated version of Figure 3.12-1 depicting the current proposed locations of wind turbines, roads, and other pertinent features.	5/25/2023 and 29-Jun	Figure provided (TN# 250303).	Figure 3.12-1 (TN# 250303) submitted is incomplete. Although a scale of 1:24,000 may not be practical to depict the subject area, the scale should be identified.	Revised figure provided (TN# 250814). Scale is 1:24,000.
WR2-05	Deficiency Letter Attachment B	Water Resources	Not specified	Not specified	Section 3.12.1.3 of the Opt-In application (TN 248288-14) does not address the applicability of the General Industrial NPDES permit administered by the CVRWQCB. Given the discussion of an Operation and Maintenance facility and the (3) concrete batch plants in the current project description (TN 248322), it would seem that the General Industrial NPDES permit might apply.	Not specified	No	53. Please include text in Section 3.12.1.3 of the Opt-In application describing how the requirements of the General Industrial NPDES permit do or do not apply to the Fountain Wind project. This discussion should include all constituents anticipated to be discharged from industrial activities 54. Per the suggestion in the CVRWQCB Comment Letter, please provide a site map of all industrial facilities of the project.	5/25/2023 and 29-Jun	53. Will be included in response to RWQCB-12 54. Please see response to WR2-04	With respect to Item 54.; Figure 3.12-1 (TN# 250303) submitted is incomplete. Although a scale of 1:24,000 may not be practical to depict the subject area, the scale should be identified.	Revised figure provided (TN# 250814). Scale is 1:24,000.

Fountain Wind Project (23-OPT-01) Responses to CEC Data Requests

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WR2-06	Deficiency Letter Attachment B	Water Resources	Not specified	Not specified	Section 4.3.4 of the Executive Summary and Project Description (TN-248322) states that the proposed O & M facility will be served by an “on-site septic system” per Shasta County regulation. The Shasta County Onsite Wastewater Treatment Systems (OWTS) program is administered in cooperation with the State Water Resources Control Board (SWCRB) under Waste Discharge Requirements (WDRs) and prohibits some practices such as receiving a projected flow of greater than 10,000 gallons per day.	Not specified	No	Please include text in Section 3.12.1.3 of the Opt-In application or the Executive Summary and Project Description that describes the type of discharges from the O & M facility and how the Shasta County OWTS program can adequately regulate it.	5/25/2023 and 29-Jun	The O&M Facility will be on a septic system for wastewater/sewer and will comply with all relevant Shasta County building codes.	If the septic tank is to be used as a receptacle only without a leach field, this should be included in the application. Details on the service provider and how the content will be disposed should also be included. If not, the anticipated constituents of O&M facility discharge, as well as the daily wastewater volume should be described in the application. given that Section 6.6.2 of the 2004 Shasta General Plan states that the confined volcanic soils in the eastern portion of the county are severely limited in supporting septic systems.	The detailed design of the O&M building and its associated septic system has yet to be developed. ConnectGen or the selected BOP contractor will hire a firm licensed in CA to complete the septic system design, which will consider geotechnical data and ground water depth to determine if a leach field /drain field can be utilized or if a septic tank with no drainage will be required. In either case, wastewater would not be discharged into surface water. If a septic tank is utilized it will be pumped on a regular basis by a company licensed/approved in Shasta County to pump, transport, and dispose of septic wastewater. If a leach field / drain field is utilized it would rely on effluent absorption and purification to treat the wastewater before it enters groundwater. The detailed design of the O&M building septic system will be developed in accordance with Shasta County Local Agency Management Program (LAMP) for Onsite Wastewater Treatment Systems (OWTS) (available at: https://www.shastacounty.gov/sites/default/files/fileattachments/environmental_health/page/2894/shasta-county-owts-technical-standards-lamp-final01b295226bfb69248dc7ff0000cdcf8f.pdf). It is anticipated that the O&M building will house up to 10 full time employees. Per the EPA (o https://www.epa.gov/sites/default/files/2015-06/documents/2004_07_07_septics_septic_2002_osdm_all.pdf), the typical wastewater flow rate from an office is between 7 and 16 gallons per person per day. Based on this standard, the maximum daily wastewater discharge would be up to approximately 160 gallons per day.
WS-03	Deficiency Letter Matrix	Worker Safety	Patterson Eagle	Appendix B (g) (11) (B)	A complete description of the fuel handling system and the fire suppression system.	Not specified	No	There is a good discussion of the fire suppression for the tower nacelles and project fire safety mitigation in the Wildfire Section (3.16.3.1). However, there is no discussion in the application materials as to fuel handling for the Project. Provide discussion of how and where fuel will be stored, used, and transported (including refueling of fuel storage tanks), equipment and vehicle refueling procedures.	5/25/2023 and 29-Jun	This information will be provided in the HMBP and FPP prior to construction. Tables of contents for these two plans were submitted to CEC as part of the original application package (TN# 248290-3).	The information submitted is incomplete. The specific information still needed is a discussion of whether fuel will be stored onsite, if stored onsite how will it be stored (ie. tanks, drums, spill controls), and will vehicle fueling occur onsite (and how will spills be prevented). I know the HMBP and FPP will contain details regading this, however I need a summary now discussing this information regarding fuel storage and fueling.	Fuel will be stored in approved aboveground storage tanks equipped with secondary containment located within temporary construction storage yards. A vendor-supplied fuel truck would make daily or weekly deliveries to the tanks, which would then be used to refuel construction vehicles. Fuel tank storage capacity would be determined by the construction contractor. Fuel tanks would be maintained and operated according to all local, state, and federal regulations during construction and operation. Spill kits will be present at each refueling location to respond to fuel leaks or spills. Refueling and general maintenance for construction equipment, such as changing fluids and lubricating parts, would occur within this temporary construction and equipment area or other outdoor locations with sufficient containment capabilities and according to measures outlined in the SPCC Plan (TN# 248290-3).