

DOCKETED	
Docket Number:	23-OPT-01
Project Title:	Fountain Wind Project
TN #:	251216
Document Title:	fwp_vis_aq_lu_responses_2023-0727
Description:	N/A
Filer:	Caitlin Barns
Organization:	Stantec Consulting Services, Inc.
Submitter Role:	Applicant Consultant
Submission Date:	7/27/2023 3:11:04 PM
Docketed Date:	7/27/2023

Data Request Identifier	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	CEC Disposition 1	Applicant Response No. 2	CEC Disposition No. 2	Applicant Response No. 3	CEC Disposition No. 3	Applicant Response No. 4	CEC Disposition No. 4	Applicant Response No. 5
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	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.	5/23/2023 and 29-Jun	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.	The response is insufficient. Specifically, project PM10 emissions during construction would exceed Shasta County AQMD thresholds of significance. Data provided (TN 250818) shows PM10 for year 1 as 433.15 pounds per day. The Shasta County significance thresholds are 80 lb/day for Level A and 137 lb/day for Level B. The 2003 Shasta County protocol indicates that emissions exceeding the thresholds should be evaluated for potential violation	See air quality response memo with dispersion modeling results (TN# 251208).				

Data Request Identifier	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	CEC Disposition 1	Applicant Response No. 2	CEC Disposition No. 2	Applicant Response No. 3	CEC Disposition No. 3	Applicant Response No. 4	CEC Disposition No. 4	Applicant Response No. 5
					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;								of ambient air quality standards using dispersion modeling. Applicant may choose to use screening models or a refined analysis, as needed.					
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	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.	5/23/2023 and 29-Jun	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 characterizing the impacts of typical operation.	See response to AIR-010.	The response is insufficient. The response should provide a detailed justification of why dispersion modeling isn't required for typical operation of the project, including scenarios of emergency generator use.	See air quality response memo with dispersion modeling results (TN# 251208).				

Data Request Identifier	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	CEC Disposition 1	Applicant Response No. 2	CEC Disposition No. 2	Applicant Response No. 3	CEC Disposition No. 3	Applicant Response No. 4	CEC Disposition No. 4	Applicant Response No. 5
					(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 ;													
LU-008	Deficiency Letter Matrix	Land Use	Vahidi Inouye Kerr	Appendix B (g) (3) (C)	A discussion of the legal status of the parcel(s) on which the project is proposed. If the proposed site consists of more than one legal parcel, describe the method and timetable for merging or otherwise combining	TN 248330: Shasta County Use Permit Application; pdf pages 8 to 16 TN 249296-9: Parcel Owners List	No	Please revise the list of parcels within the project area. The list of parcels within the proposed project area reflects the 2019 proposed project site. The list needs to be	25-May 1-Jun 21-Jun 10-Jul 17-Jul 21-Jul	A table with APNs within the Project Site is included (TN# 250435). See note on 250435 which states: To our knowledge, all of these parcels are recognized as legally created parcels under California law. No parcel mergers are anticipated. No structures, except for linear features such as access roads and collection lines, will straddle parcel boundaries.	The information submitted is incomplete. TN 250289 (LU-008_fwp_response_memo), TN 250435 (LU-008_fwp_parcel_numbers_rev2), and TN 250448 (land_use_fwp_responses) are not adequate responses to the Warren-Alquist Act Siting Regulation Appendix B (g)(3)(C). The specific information still needed is: --Clarification on the list of parcels that include all parcels upon which project activities would occur and that are within the Applicant's defined project site boundary. The list of parcels docketed in TN 250435	The original APN list docketed as TN 250289 was over-inclusive. The revised APN list and maps have been docketed as TN 250435 is the correct list. The list in TN 250289 should be disregarded. A discussion of the legal status of	Thank you for confirming that the corrected list of parcels is provided in TN 250435, and that TN 250289 should be disregarded. The information submitted is incomplete. The specific information still needed is the	Lease extension provided (TN# 250984).	CEC Staff has reviewed TN 250984 (Amendment to Amendment, Restated, and Combined Option for Wind Energy Lease). Part 3 (Option Term) of the Amendment states, "The initial term of the Option shall be	The Applicant entered into the original Option to Lease in 2012. A redacted copy is docketed as TN #250984. Included as Exhibit B to this Option is a Renewable Energy Lease Agreement, which lease will become effective upon exercise of the option. Paragraph	Note that these portions of the lease have been redacted in the Applicant's docketed TN #250984. Therefore, Staff cannot review these portions referenced in the docketed file to confirm this informat	See updated lease option (TN# 251202). Page 30 of the PDF notes the lease expiration date.

Data Request Identifier	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	CEC Disposition 1	Applicant Response No. 2	CEC Disposition No. 2	Applicant Response No. 3	CEC Disposition No. 3	Applicant Response No. 4	CEC Disposition No. 4	Applicant Response No. 5
					those parcels so that the proposed project, excluding linears						(LU-008_fwp_parcel_numbers_rev2) does not match the list of parcels docketed in TN 250289 (LU-008_fwp_response_memo). The more recent docket filing (TN 250435) does not identify any of the changes to the list of APNs or explain why a revised list of APNs was docketed. --A revised discussion of the legal status of the parcels on which the project is proposed. As required by the Warren-Alquist Act Siting Regulation Appendix B (g)(3)(C), "If the proposed site consists of more than one legal parcel, describe the method and timetable for merging or otherwise combining those parcels so that the proposed project, excluding linears and temporary laydown or staging area, will be located on a single legal parcel." The proposed project includes non-linear and permanent infrastructure such as turbines, meteorological and microwave towers, O&M Facilities, Substation/Switchyard sites that would be sited on multiple parcels. Per the Warren-Alquist Act Siting Regulation Appendix B (g)(3)(C), the Applicant must provide the method and timetable for merging or otherwise	the parcels was provided as part of TN 250435- and is repeated here: "To Applicant's knowledge, all of these parcels are recognized as legally created parcels under California law. No parcel mergers are anticipated. No structures, except for linear features such as access roads and collection lines, will straddle parcel boundaries." The data request again requests information about parcel mergers. Parcel mergers are only necessary where	following: -Please provide documentation of the lease extension for each parcel upon which the Project would be sited as proof of site control. As mentioned in the prior disposition response, "Although parcel mergers are not at the crux of this issue, parcel legality and site control are important. The legal status of each parcel upon which the Project would be sited is important and the Applicant needs to disclose parcel ownership status, if the		and remain in effect for eight (8) years after the Effective Date of this Option Agreement, unless earlier terminated or extended in accordance with the provisions herein ("Option Term"). The Parties agree that this updated Initial Option Term unites each of the prior Initial Option Terms pertaining to the Property that exist within the Prior Existing Property Options to be updated to run for up to such eight (8) additional years,	1.5 of the Lease Agreement calls for a term until May 1, 2047, a term of 35 years from the date of the original option agreement. The ability to exercise the option has been extended to 2029. See TN# 250984. The Applicant expects the landowner will extend the lease term to allow a full 35 years of operations once the CEC approves the project.	on. Please enter the requested information into the docket in some format so that Staff can reference it in our analyses and for the public to be able to review this information.	

Data Request Identifier	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	CEC Disposition 1	Applicant Response No. 2	CEC Disposition No. 2	Applicant Response No. 3	CEC Disposition No. 3	Applicant Response No. 4	CEC Disposition No. 4	Applicant Response No. 5	
											combining those parcels so that they are located on a single legal parcel. Although parcel mergers are not at the crux of this issue, parcel legality and site control are important. The legal status of each parcel upon which the Project would be sited is important and the Applicant needs to disclose parcel ownership status, if the parcels will be purchased or leased, and if there are any encumbrances or deed restrictions associated with each parcel upon which the project would be sited.	non-linear facilities (such as the O&M building or a substation) are proposed to straddle parcel lines. Applicant confirms that no non-linear structures are proposed to straddle parcel lines. Wind energy projects, which commonly comprise thousands of acres, are commonly constructed on multiple legal parcels. It would be impractical (and unnecessary) for a utility-scale wind energy project to be constructed on a single legal parcel. No parcel mergers are proposed	parcels will be purchased or leased, and if there are any encumbrances or deed restrictions associated with each parcel upon which the project would be sited."		in accordance with this Section 3, from the Effective Date of this Option Agreement." As the "Effective Date of the Option Agreement" is April 4, 2016, the initial term of the Option would remain in effect until April 4, 2024. Even with the option of lease renewal for an additional 8 years after 2024 (i.e., lease expiration in 2032), TN 250984 does not provide proof of site control through the				

Data Request Identifier	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	CEC Disposition 1	Applicant Response No. 2	CEC Disposition No. 2	Applicant Response No. 3	CEC Disposition No. 3	Applicant Response No. 4	CEC Disposition No. 4	Applicant Response No. 5
												<p>or required. Site ownership and control has already been disclosed (TN# 248331) and a lease extension has been finalized. An updated memorandum of lease will be provided as soon as it is available. Appendix B does not require the Applicant to provide an analysis of encumbrances or deed restrictions on each parcel. Nonetheless, the Applicant confirms that no encumbrances or deed restrictions preclude construction or operation of the</p>			<p>Project's 35-year operation period. Please provide proof of site control for each parcel upon which the Project would be sited throughout the proposed 35-year operation period.</p>			

Data Request Identifier	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	CEC Disposition 1	Applicant Response No. 2	CEC Disposition No. 2	Applicant Response No. 3	CEC Disposition No. 3	Applicant Response No. 4	CEC Disposition No. 4	Applicant Response No. 5
												proposed project.						
VIS-01	Deficiency Letter Matrix	Visual Resources	Clayton Kerr	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 248288-4: DEIR Visual Resources 3.2.2.1 Study Area, 3.2.2.2 Environmental Setting, 3.2.4.2 Direct and Indirect Effects of the Project, and 3.2.5 Cumulative Impacts TN 248320-10: Shadow Flicker Rev. 2 TN 248320-13: Visual Resources Technical Report Rev. 2, Sections 2.2 Setting, 4.0 Affected Environment, 5.0 Results and Discussion, and 5.4 Potential Mitigation	No	<ul style="list-style-type: none"> The current impact analysis addresses the previous project and must be revised to address the currently proposed project. The selected seven KOPs are inadequate to support the present analysis and must be revised/augmented. Specifically: <ul style="list-style-type: none"> Of the original seven KOPs, only two (KOPs 1 and 2) are close enough to the project such that turbines could be perceived. A better balance of distant and proximal viewing locations needs to be represented in the selection of KOPs in order to accurately characterize 	2-May and 9-Jun	The KOPs provide the vehicle by which existing and proposed conditions are representatively discussed in the VIA and EIR. The seven KOP locations were previously identified and selected based on coordination with Shasta County, the lead agency for the Project during development of materials to support the CEQA analysis. Changes will be made to the set of KOPs as follows. Included below are references to: updated viewshed figures, high-resolution JPEG images of existing simulations, and figures showing the comparative effects between the project as proposed in the DEIR and as revised and submitted to the Shasta County Board of Supervisors on 9/13/21 (Fig6_fountain_wind_sims_091321 [TN# 249950-3]), all of which were submitted via Kitework on May 2, 2023: <ul style="list-style-type: none"> KOP 1: Remove from set. KOP 2: Retain. Please see 9/13/21 BOS Fig 6-2D, which indicates that the most proximate / visible turbines remain within the field of view shown here. Please also see high-resolution JPEG of simulation for 	The information submitted is incomplete. The specific information still needed includes the following: <ul style="list-style-type: none"> Impact analysis that addresses the current project from all final KOPs. Addition of an augmented KOP analysis and additional simulation for the expanded KOP 3 frame of view. Replacement of KOP 4 with a new location with analysis and simulation. Findings of additional field review to determine feasibility of a second KOP (5b for residential area) in the community of Burney. Narrative description of the location and visibility (or lack thereof) of areas to be subjected to road widening and/or landscape clearing. Description of night lighting proposed to be used on the site along with any proposed night lighting control measures to be employed to minimize off-site night lighting visual impacts. Revisions to Table VIS-06 including turbine heights in feet, total height from base to the hub, and the total height from the 	Please see visual resources addendum (TN# 250566 and 250567).	The information submitted is incomplete. The specific information still needed includes the following: <ul style="list-style-type: none"> For KOPs 6 (Pit River Overlook) and 7 (Redding), provide the high resolution graphics comparable to what has been submitted for KOPs 2 through 5b. It was not the intent of previous CEC direction to drop KOPs 6 and 7 but to augment them. For each of the KOPs (2 through 7), add a full-page, 	Please see updated visual resources report (TN# 251199), which is intended to replace the previous submittal. New simulations (KOPs 6 and 7 existing + proposed) and revised simulations (KOP 2, KOP 4b, and KOP 5b) have been submitted via Kiteworks (TN# 251200). Updated Table VIS-06 includes dimensions for the O&M building and temporary concrete batch plants (TN# 251196).				

Data Request Identifier	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	CEC Disposition 1	Applicant Response No. 2	CEC Disposition No. 2	Applicant Response No. 3	CEC Disposition No. 3	Applicant Response No. 4	CEC Disposition No. 4	Applicant Response No. 5
						TN 248330-2: Project Refinement Memo, Section 2.6 Visual Resources and 3.0 Conclusions		<p>Aesthetics impacts on public views. For example, a portion of the B turbine string is within one mile of SR 299. That segment of SR 299 and may be an appropriate location for a representative KOP if project visibility can be demonstrated.</p> <p>o Under the currently proposed project design, KOP 1 is no longer orientated toward the project and must either be reoriented or replaced such that the project is visible in the frame of view.</p> <ul style="list-style-type: none"> The visual simulations provided to support the impact analysis are inadequate in terms of quality, content, and format and must be revised and/or The resolution of the provided images is so 		<p>KOP 2 (KOP2c_FtnWind_BOS_Sept2021-revised).</p> <ul style="list-style-type: none"> KOP 3: Supplement. A second simulation will be produced showing the view centered to the east-southeast from KOP 3. 9/13/21 BOS Fig 6-3D indicates that additional turbines would be visible. (See KOP3cFTNWind_BOS-Sept2021-revised) KOP 4: Add view from closer east-west stretch of SR299, per CEC request. Turbines would be visible in direct views of short duration; show in deference to disclosure. Simulation may also demonstrate extent to which new / expanded roads would be visible. (See KOP4c_FtnWind_BOS-Sept2021-revised) KOP 5: Retain as representative of viewer experience from Burney. The town of Burney is moderately to heavily forested in its downtown and in areas along / south of SR 299. The northern segment of the town consists mainly of rural residences and small ranches. Where absence of forested areas would allow for unobstructed line-of-sight toward the proposed project, views would appear to represent private residences or otherwise less developed conditions than the community center / gathering place views this KOP was selected to represent. (See KOP5c_FtnWind_BOS-Sept2021-revised) 	base to the blade tip. - Submittal of all images in full-page, high resolution format		<p>high-resolution, existing-view image to accompany the provided full-page, high-resolution simulation.</p> <ul style="list-style-type: none"> For each KOP view orientation inset map, please indicate (color code) which specific turbines are visible in each of the simulations. Section 5 of the Addendum describes KOP 4b as viewing from eastbound SR 299. Please verify if this is a typo and the view is from westbound SR 299. Section 2.1 states that security lighting at gates would be 					

Data Request Identifier	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	CEC Disposition 1	Applicant Response No. 2	CEC Disposition No. 2	Applicant Response No. 3	CEC Disposition No. 3	Applicant Response No. 4	CEC Disposition No. 4	Applicant Response No. 5	
								<p>low that the turbines described in the text and captions as being visible are minimally discernible.</p> <ul style="list-style-type: none"> o In some simulations, the color of the turbines does not appear as bright (white) as one would expect for turbines not being backlit by the sun. This artificially reduces structure visibility. o Full-page, color photographs of the existing views and visual simulations of the proposed project at life-size scale (when the picture is held 10 inches from the viewer's eyes) have not been provided as required in the Siting Regulations Appendix B (g) (6) (F) and must be submitted. • The DEIR acknowledges that vegetation cleared corridors may 		<p>- KOP 6: Retain. Please see high-resolution JPEG (KOP6c_FtnWind_BOS-Sept2021-revised)</p> <p>- KOP 7: Retain. Please see high-resolution JPEG (KOP7c_FtnWind_BOS-Sept2021-revised)</p> <p>Full-page, color photographs of the existing views and visual simulations (as included in the DEIR and provided as supplement to the Shasta County Board of Supervisors in September 2021) were submitted via Kiteworks on May 2, 2023 (See KOP files "EXISTING" and "DEIRproposed").</p> <p>With the exception of the two access points along SR 299, road widening required by the project would be limited to areas within the project footprint and likely not prominently visible from SR 299 or other publicly accessible points due to obstruction from roadside vegetation.</p> <p>The Applicant will coordinate with FAA to establish the type and amount of night lighting required for the Project. This information is not known at present. As agreed in communication with CEC on 4/13/23, the Applicant will provide a reasonable timeline for when CEC would receive final night lighting plans.</p>			<p>"...shielded and downward-facing to the extent practicable and would be motion-activated where possible." Please clarify the location of the gates (e.g., at the access points along SR 299?), and if the referenced gates are, in fact, at SR 299, please elaborate the extent to which this lighting would be visible to travelers on SR 299 and what mitigation control measures would be implemented.</p> <ul style="list-style-type: none"> • The last paragraph in the discussion of KOP 4b states that "Any night lighting would be 						

Data Request Identifier	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	CEC Disposition 1	Applicant Response No. 2	CEC Disposition No. 2	Applicant Response No. 3	CEC Disposition No. 3	Applicant Response No. 4	CEC Disposition No. 4	Applicant Response No. 5	
								<p>be detectable in long distance views and states that minimal visual contrast would result. However, there is no analysis or simulations to support this conclusion. Therefore, an evaluation of the considerable vegetation clearance that is proposed for the Overhead Collector Corridors and for Road Widening shall be provided. If any in-line views of a cleared linear corridor are visible from a public vantage point, a representative KOP shall be established, and a simulation shall be prepared.</p> <p>* Proposed night lighting at the project site is insufficiently described to support the stated conclusion that lighting</p>					<p><i>highly visible from this location.</i>" It also states "Roadside vegetation would partially or completely block visibility of light from adjacent segments." Please clarify the source(s) of the referenced light and identify the proposed control measures.</p>						

Data Request Identifier	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	CEC Disposition 1	Applicant Response No. 2	CEC Disposition No. 2	Applicant Response No. 3	CEC Disposition No. 3	Applicant Response No. 4	CEC Disposition No. 4	Applicant Response No. 5
								impacts would be less than significant. All proposed lighting with the potential to be viewed by the public beyond the project boundary must be described and mapped. Further, lighting mitigation measures need to be identified where night lighting has the potential to be viewed by the public. In those cases, a night lighting mitigation plan shall be provided.										
VIS-08	Deficiency Letter Matrix	Visual Resources	Clayton Kerr	Appendix B (g) (6) (F)	i) Provide: full-page color photographic reproductions of the existing site, and full-page color simulations of the proposed project at life-size scale when the picture is held 10 inches from the viewer's	TN 248320-13: Visual Resources Technical Report Rev. 2 TN 248330-2: Project Refinement Memo, Figures 5a, 5b, and 5d through 5g	No	o The visual simulations provided to support the impact analysis are inadequate in terms of quality, content, and format and must be revised and/or replaced to correct the following inadequacies: The resolution of the provided images is so low that the turbines	2-May and 9-Jun	Full-page, color photographs of the existing views and visual simulations (as included in the DEIR and provided as supplement to the Shasta County Board of Supervisors in September 2021) provided via Kiteworks on May 2, 2023.	The information submitted is incomplete. The specific information still needed includes the following: - Full-page, color photographs of the existing views and visual simulations for all new and revised or augmented KOPs including KOP 3 (augmented), KOP 4 (to be replaced), and KOP 5 (if an additional viewpoint is added in Burney).	Please see visual resources addendum (TN# 250566 and 250567).	The information submitted is incomplete. The specific information still needed includes the following: • For KOPs 6 (Pit River Overlook) and 7 (Redding), provide the high resolution graphics	Please see updated visual resources report (TN# 251199), which is intended to replace the previous submittal. New simulations (KOPs 6 and 7 existing + proposed) and revised simulations (KOP 2, KOP 4b, and KOP 5b) have been				

Data Request Identifier	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	CEC Disposition 1	Applicant Response No. 2	CEC Disposition No. 2	Applicant Response No. 3	CEC Disposition No. 3	Applicant Response No. 4	CEC Disposition No. 4	Applicant Response No. 5	
					eyes, including any project-related electrical transmission lines, in the existing setting from each key observation point. If any landscaping is proposed to comply with zoning requirements or to mitigate visual impacts, include the landscaping in simulation (s) representing sensitive area views, depicting the landscaping five years after installation; and estimate the expected time until maturity is reached.			described in the text and captions as being visible are minimally discernible. In some simulations, the color of the turbines does not appear as bright (white) as one would expect for turbines not being backlit by the sun. This artificially reduces structure visibility. Full-page, color photographs of the existing views and visual simulations of the proposed project at life-size scale (when the picture is held 10 inches from the viewer's eyes) have not been provided as required in the Siting Regulations Appendix B (g) (6) (F), and must be submitted.					comparable to what has been submitted for KOPs 2 through 5b. It was not the intent of previous CEC direction to drop KOPs 6 and 7 but to augment them. <ul style="list-style-type: none"> • For each of the KOPs (2 through 7), add a full-page, high-resolution, existing-view image to accompany the provided full-page, high-resolution simulation. 						
VIS-09	Deficiency Letter Matrix	Visual Resources	Clayton Kerr	Appendix B (g) (1)	An assessment of the visual	TN 248288-2: DEIR Section	No	* The current impact analysis	2-May and 9-Jun	See responses to VIS-01.	The information submitted is incomplete. The specific information still	Please see visual resources addendum	The information submitted	Please see updated visual resources					

Data Request Identifier	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	CEC Disposition 1	Applicant Response No. 2	CEC Disposition No. 2	Applicant Response No. 3	CEC Disposition No. 3	Applicant Response No. 4	CEC Disposition No. 4	Applicant Response No. 5	
					impacts of the project, including light, glare, and any modeling of visible plumes. Include a description of the method and identify any computer model used to assess the impacts. Provide an estimate of the expected frequency and dimensions (height, length, and width) of the visible cooling tower and/or exhaust stack plumes. Provide the supporting assumptions, meteorological data, operating parameters, and calculations used.	2.4.1, Figure 2-4a: Typical Wind Turbine and Figure 6: Typical Overhead Collector Line Pole TN 248288-4: DEIR Visual Resources Sections 3.2.2 Setting and 3.2.4 Direct and Indirect Effects TN 248297-2: CEQA Initial Study, Figure 6: Typical Overhead Collector Line Pole TN 248320-13: Visual Resources Technical Report Rev. 2 TN 248322: Executive Summary and Project Description, Sections 3.1 Wind Turbine Generator s; 4.1.2 Overhead Collector System; 4.2		addresses the previous project and must be revised to address the currently proposed project. * The selected seven KOPs are inadequate to support the present analysis and must be revised/augmented. Specifically: - Of the original seven KOPs, only two (KOPs 1 and 2) are close enough to the project such that turbines could be perceived. A better balance of distant and proximal viewing locations needs to be represented in the selection of KOPs in order to accurately characterize Visual Resources impacts on public views. For example, a portion of the B turbine string is within one mile of SR 299. That			needed includes the following: - Impact analysis that addresses the current project from all final KOPs. - Addition of an augmented KOP analysis and additional simulation for the expanded KOP 3 frame of view. - Replacement of KOP 4 with a new location with analysis and simulation. - Findings of additional field review to determine feasibility of a second KOP (5b for residential area) in the community of Burney. - Narrative description of the location and visibility (or lack thereof) of areas to be subjected to road widening and/or landscape clearing. - Description of night lighting proposed to be used on the site along with any proposed night lighting control measures to be employed to minimize off-site night lighting visual impacts. - Revisions to Table VIS-06 including turbine heights in feet, total height from base to the hub, and the total height from the base to the blade tip. - Submittal of all images in full-page, high resolution format	(TN# 250566 and 250567).	is incomplete. The specific information still needed includes the following: • For KOPs 6 (Pit River Overlook) and 7 (Redding), provide the high resolution graphics comparable to what has been submitted for KOPs 2 through 5b. It was not the intent of previous CEC direction to drop KOPs 6 and 7 but to augment them. • For each of the KOPs (2 through 7), add a full-page, high-resolution, existing-view image to accompany the provided full-page, high-resolution simulation	report (TN# 251199), which is intended to replace the previous submittal. New simulations (KOPs 6 and 7 existing + proposed) and revised simulations (KOP 2, KOP 4b, and KOP 5b) have been submitted via Kiteworks (TN# 251200). Updated Table VIS-06 includes dimensions for the O&M building and temporary concrete batch plants (TN# 251196).					

Data Request Identifier	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	CEC Disposition 1	Applicant Response No. 2	CEC Disposition No. 2	Applicant Response No. 3	CEC Disposition No. 3	Applicant Response No. 4	CEC Disposition No. 4	Applicant Response No. 5
						Substation, Switching Station, and Interconnection Facilities; 4.3.1 Access Roads; 4.3.3 O&M Facility; and 4.3.4 Meteorological Equipment TN 248330-2: Project Refinement Memo, Section 2.6 Visual Resources and Section 3.0 Conclusions		segment of SR 299 and may be an appropriate location for a representative KOP if project visibility can be demonstrated. - Under the currently proposed project design, KOP 1 is no longer orientated toward the project and must either be re-oriented or replaced such that the project is visible in the frame of view. * The visual simulations provided to support the impact analysis are inadequate in terms of quality, content, and format and must be revised and/or replaced to correct the following inadequacies: - The resolution of the provided images is so low that the turbines described in the text and captions as					. •For each KOP view orientation inset map, please indicate (color code) which specific turbines are visible in each of the simulations. • Section 5 of the Addendum describes KOP 4b as viewing from eastbound SR 299. Please verify if this is a typo and the view is from westbound SR 299. • Section 2.1 states that security lighting at gates would be "...shielded and downward-facing to the extent practicable and would be motion-					

Data Request Identifier	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	CEC Disposition 1	Applicant Response No. 2	CEC Disposition No. 2	Applicant Response No. 3	CEC Disposition No. 3	Applicant Response No. 4	CEC Disposition No. 4	Applicant Response No. 5
								<p>being visible are minimally discernible.</p> <ul style="list-style-type: none"> - In some simulations, the color of the turbines does not appear as bright (white) as one would expect for turbines not being backlit by the sun. This artificially reduces structure visibility. - Full-page, color photographs of the existing views and visual simulations of the proposed project at life-size scale (when the picture is held 10 inches from the viewer's eyes) have not been provided as required in the Siting Regulations Appendix B (g) (6) (F) and must be submitted. <p>* The DEIR acknowledges that vegetation-cleared corridors may be detectable in long-distance views and states that</p>					<p><i>activated where possible."</i> Please clarify the location of the gates (e.g., at the access points along SR 299?), and if the referenced gates are, in fact, at SR 299, please elaborate the extent to which this lighting would be visible to travelers on SR 299 and what mitigation control measures would be implemented.</p> <ul style="list-style-type: none"> • The last paragraph in the discussion of KOP 4b states that "<i>Any night lighting would be highly visible</i> 					

Data Request Identifier	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	CEC Disposition 1	Applicant Response No. 2	CEC Disposition No. 2	Applicant Response No. 3	CEC Disposition No. 3	Applicant Response No. 4	CEC Disposition No. 4	Applicant Response No. 5	
								<p>minimal visual contrast would result. However, there is no analysis or simulations to support this conclusion. Therefore, an evaluation of the considerable vegetation clearance that is proposed for the Overhead Collector Corridors and for Road Widening shall be provided. If any in-line views of a cleared linear corridor are visible from a public vantage point, a representative KOP shall be established, and a simulation shall be prepared.</p> <p>* Proposed night lighting at the project site is insufficiently described to support the stated conclusion that lighting impacts would be less than significant. All proposed</p>					<p><i>from this location." It also states "Roadside vegetation would partially or completely block visibility of light from adjacent segments." Please clarify the source(s) of the referenced light and identify the proposed control measures.</i></p>						

Data Request Identifier	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	CEC Disposition 1	Applicant Response No. 2	CEC Disposition No. 2	Applicant Response No. 3	CEC Disposition No. 3	Applicant Response No. 4	CEC Disposition No. 4	Applicant Response No. 5
								lighting with the potential to be viewed by the public beyond the project boundary must be described and mapped. Further, lighting mitigation measures need to be identified where night lighting has the potential to be viewed by the public. In those cases, a night lighting mitigation plan shall be provided.										
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	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 construction, operation, and maintenance, however most of the details apply prevention of wildfire and to the construction phase. Insufficient detail is included in familiarity/training of operational and maintenance workers with the FPP, many of 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	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	The response is insufficient. It does not address CEC Disposition 1 regarding additional detail for MM 3.16-2a for fire prevention practices and procedures during project construction.	Based on clarification received from CEC staff on 7/20/2023, the Applicant understands that the CEC Disposition 2 requests additional detail for MM-3.16-2a regarding fire prevention practices and procedures during project operation. MM-3.16-2a correctly references that the				

Data Request Identifier	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	CEC Disposition 1	Applicant Response No. 2	CEC Disposition No. 2	Applicant Response No. 3	CEC Disposition No. 3	Applicant Response No. 4	CEC Disposition No. 4	Applicant Response No. 5
					400 workers onsite during construction and up to 12 full-time employees onsite during operation.						<p>also occur during operation and/or maintenance.</p> <p>The information submitted does not address the comment regarding wildfire hazards to workers nor adverse effects of inhalation of wildfire pollutants on workers.</p>	<p>Health, health effects known or suspected to be caused by exposure to wildfire smoke include:</p> <ul style="list-style-type: none"> - 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. <p>The Applicant will ensure that workers are protected</p>		Applicant will develop a Fire Prevention Plan that will be implemented during construction, operation, and decommissioning. The measures that the Fire Prevention Plan shall include focus on mitigating wildfire risk based on specific activities that contribute to potential ignition source, many of which more commonly occur during construction. However some of these activities may also occur during the operations and decommissioning phases of the Project. Therefore, the Fire Prevention Plan and required measures are designed around				

Data Request Identifier	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	CEC Disposition 1	Applicant Response No. 2	CEC Disposition No. 2	Applicant Response No. 3	CEC Disposition No. 3	Applicant Response No. 4	CEC Disposition No. 4	Applicant Response No. 5
												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		activities, not project phase. As described in 3.16-2a, examples of fire prevention measures that may be applicable during operational activities include, but are not limited to: <ul style="list-style-type: none"> • The Project applicant shall designate primary and alternate Fire Coordinators, responsible for ensuring operations and maintenance crews (including contractors) have sufficient fire suppression equipment, communication equipment, shall lead and coordinate fire patrols, ensure the required clearances are followed onsite, and ensure that all crew members receive training on 				

Data Request Identifier	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	CEC Disposition 1	Applicant Response No. 2	CEC Disposition No. 2	Applicant Response No. 3	CEC Disposition No. 3	Applicant Response No. 4	CEC Disposition No. 4	Applicant Response No. 5
												<p>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:</p> <ul style="list-style-type: none"> - Relocating or rescheduling work tasks to smoke-free or less smoky areas or times of the day; - Reducing levels of physical 		<p>the FPP and its components .</p> <ul style="list-style-type: none"> • Operations vehicles and equipment will be visually inspected for potential sparking risks prior to operation of the vehicle. • Operations staff and/or contractors will have water tanks, water trucks, or portable water backpacks sited/available on the Project for fire protection. • All operations crews will have radio and/or cellular access that is operational within the Project Site to allow communications with other operations crews and the O&M office. All fires shall be reported immediately upon detection. • Internal combustion engines, 				

Data Request Identifier	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	CEC Disposition 1	Applicant Response No. 2	CEC Disposition No. 2	Applicant Response No. 3	CEC Disposition No. 3	Applicant Response No. 4	CEC Disposition No. 4	Applicant Response No. 5
												<p>activity when possible, especially strenuous and heavy work; and</p> <ul style="list-style-type: none"> - Requiring workers to take frequent breaks in places that are free from smoke. 		<p>stationary and mobile, will be equipped with spark arresters in good working order.</p> <ul style="list-style-type: none"> • Light operations trucks and cars with factory-installed mufflers will be used only on roads where the roadway is cleared of vegetation. • Equipment parking areas and small stationary engine sites will be cleared of all extraneous flammable material. • A fire conditions monitoring program will be implemented to monitor meteorological data during operations. • A monitoring and inspection protocol for turbines and electrical infrastructure will be implemented during operations. 				

Data Request Identifier	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	CEC Disposition 1	Applicant Response No. 2	CEC Disposition No. 2	Applicant Response No. 3	CEC Disposition No. 3	Applicant Response No. 4	CEC Disposition No. 4	Applicant Response No. 5
														<ul style="list-style-type: none"> • Prohibition on smoking in wildland areas, with smoking limited to paved areas or areas cleared of all vegetation. • Each operations vehicle will be equipped with a fire extinguisher sufficient to extinguish small fires. 				