

DOCKETED	
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To:	Leonidas Payne California Energy Commission	From:	Caitlin Barns Stantec Consulting Services, Inc.
File:	Fountain Wind Project (23-OPT-01)	Date:	August 31, 2023

Re: Memorandum Addressing Sufficiency of Response for LU-001**CEC Disposition No. 3**

The Applicant's response provided in TN 251556 does not address the information requested in CEC Disposition 2. As stated by the Applicant in TN 251556, "...the project will result in less timber harvesting in the future than if the project is not constructed because the project will permanently convert 510 acres of land currently available for harvesting activities." This statement acknowledges the Project-induced acreage of timber conversion. Since the Project is not a timber harvesting project, the Project-related analysis will need to identify level of significance of project-induced timber conversion activities, including indirect and cumulative effects.

To prepare a complete analysis of the temporary and permanent indirect and/or cumulative loss of timber resulting from project activities, please provide:

- The potential indirect effects on the region as a whole due to Project-related timber loss.
- To further evaluate the significance of cumulative impacts from timber loss, an evaluation of the effects from other similar projects in the region (i.e., Hatchet Ridge Wind Project) on commercial timber harvesting activities.
- Mitigation measures identified by the Applicant to mitigate the adverse impacts of timber loss to less-than-significant levels.

Applicant Response No. 4

Indirect timber impacts, such as effects that occur in a different place or time than the proposed project, are not anticipated as a result of the project for the following reasons:

- The land on which the project is proposed is already commercially harvested for timber. As such, the observation that the proposal will cause a "project induced acreage of timber conversion" must be viewed in the context of timber harvesting activities if the project is not approved. Without the project, the land is likely to continue to be harvested for timber because it is heavily forested, privately owned by commercial timber harvesting interests and zoned for timberland production. Further, more acres of commercial timber harvesting would occur in the future without the project than with the project because the project will permanent remove 510 acres of timberland for wind energy production and thus these 510 acres would no longer be available for on-going harvesting activities, thus slightly reducing timber harvesting activities in comparison to today.
- The harvesting of timber associated with the project is not likely to result in indirect impacts on adjacent properties such as by leading to future timber conversion on adjacent or nearby lands (e.g., Lassen National Forest land or nearby private timber holdings). Timber harvesting is not considered "growth-inducing" in that it not known to encourage or lead to similar activities on adjacent properties. Whether timber harvesting occurs on adjacent properties is influenced more by the presence or absence of marketable timber, whether the land is privately or publicly owned and whether zoning and other regulations allow timber harvesting. If timber harvesting activities did have such indirect

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impacts, it would be expected that today's harvesting activities might have caused spillover harvesting effects on the adjacent Lassen National Forest Land but that is not the case.

The project is also not anticipated to lead to cumulative impacts either from timber harvesting or from timber conversion for the following reasons:

- Cumulative Timber Harvesting. As explained above, the project will result in less timber harvesting in the future than if the project is not constructed because the project will permanently convert 510 acres of land currently available for harvesting activities. As such, if the project is approved, any direct or indirect cumulative impacts related to timber harvesting would be reduced in comparison to today.
- Cumulative Timber Conversion. The proposed permanent conversion of 510 acres combined with other potential conversions would not result in a cumulatively significant loss of harvestable timberland in Shasta County. The amount of land to be permanently lost to timber harvesting is 510 acres. Of the County's 2,428,000 total acres (per the Shasta County General Plan, 2004), 59 percent or 1,454,680 acres are dedicated to commercial forest uses (Shasta County Planning Commission GIS exercise, 2020). The Project would permanently impact 510 acres, which equates to permanent conversion of less than 0.04 percent of commercial forest lands and less than 0.02 percent of total timberland. Further, there is no evidence that there are or will be a significant number of other projects in Shasta County that would lead to a cumulatively significant conversion of acres of timberland. County zoning prohibits most uses on lands zoned for timber production other than timber harvesting. Prior to 2022, utility scale energy generation was an allowed use on timberlands with a conditional use permit. The zoning rules in existence before 2022 allowed for the construction of the Hatchet Wind project which, according to its EIR (2010), permanently converted 75 acres of timberland. Since 2010, the Applicant is not aware of any other projects that have been approved in Shasta County that have permanently converted large numbers of acres of timberland. (A cumulative projects list was compiled by Shasta County in its 2021 EIR.) As noted, in 2022, the County amended its zoning code to prohibit new utility-scale wind development on almost lands within the County. Given the restrictions on transmission and the difficulty of obtaining approval for new utility-scale wind in Shasta County due to its current zoning regime, the Applicant does not anticipate a significant number of new wind projects that, combined with the proposed project, would result in cumulatively considerable impact on timberlands. The approval of future wind projects in Shasta County is speculative, particularly given the lack of transmission capacity. Further, given the restrictive zoning for lands zoned for timber production, it is also unlikely that there would many other non-wind energy projects that would result in a significant cumulative conversion of timberland. As such, no mitigation is anticipated to be required for direct, indirect or cumulative impacts to timberland.

The Applicant has provided all the information it has to respond to this data request.