Appendix J
Scoping Report

Shasta County Department of Resource Management Planning Division

FOUNTAIN WIND PROJECT
ENVIRONMENTAL IMPACT REPORT

SCOPING REPORT

March 20, 2019

Use Permit No. UP 16-007
State Clearinghouse No. 2019012029

Prepared for:
Shasta County Department of Resource Management Planning Division

Prepared by:
Environmental Science Associates

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FOUNTAIN WIND PROJECT
Scoping Report

1. Introduction

The Shasta County Department of Resource Management Planning Division (County) is preparing an Environmental Impact Report (EIR) for the Fountain Wind Project as part of the County's consideration of the application for Use Permit No. 16-007 filed by Pacific Wind Development, LLC (Applicant), a subsidiary of Avangrid Renewables, LLC (Project).[1] This scoping report documents input contributed by agencies, Tribes, and members of the public during the EIR scoping period (January 15, 2019 to February 22, 2019). As the public agency with principal responsibility for carrying out or approving the Project, the County is the Lead Agency for purposes of complying with the California Environmental Quality Act (CEQA).

CEQA Guidelines Section 15083 provides that a "Lead Agency may…consult directly with any person…it believes will be concerned with the environmental effects of the project." Scoping is the process of early consultation with affected agencies and the public prior to completion of a Draft EIR. Section 15083(a) states that scoping can be "helpful to agencies in identifying the range of actions, alternatives, mitigation measures, and significant effects to be analyzed in depth in an EIR and in eliminating from detailed study issues found not to be important." Scoping is an effective way to bring together and consider the concerns of affected State, regional, and local agencies, the Project proponent, and other interested persons (CEQA Guidelines §15083(b)). Scoping is not conducted to resolve differences concerning the merits of a project or to anticipate the ultimate decision on a proposal. Rather, the purpose of scoping is to determine the scope of information and analysis to be included in an EIR and, thereby, to ensure that an appropriately comprehensive and focused EIR will be prepared that provides a firm basis for informed decision-making. Comments not within the scope of CEQA will not be addressed through the CEQA process but will be included as part of record of information for consideration by the County as part of its decision-making process for the Project.

This report is intended for use by the County in preparing the EIR as formal documentation of initial input received from governmental agencies, Tribes, and members of the public regarding the range of actions, alternatives, mitigation measures, and potential significant effects to be analyzed in depth in the EIR. It also provides access for other agencies and members of the public to see the comments received during the scoping period.

[1] The County is conducting the EIR process, including the preparation of this Scoping Report, pursuant to the requirements of CEQA (Pub. Res. Code §21000 et seq.) and its implementing regulations, the CEQA Guidelines (14Cal. Code Regs. §15000 et seq.).

2. Description of the Project

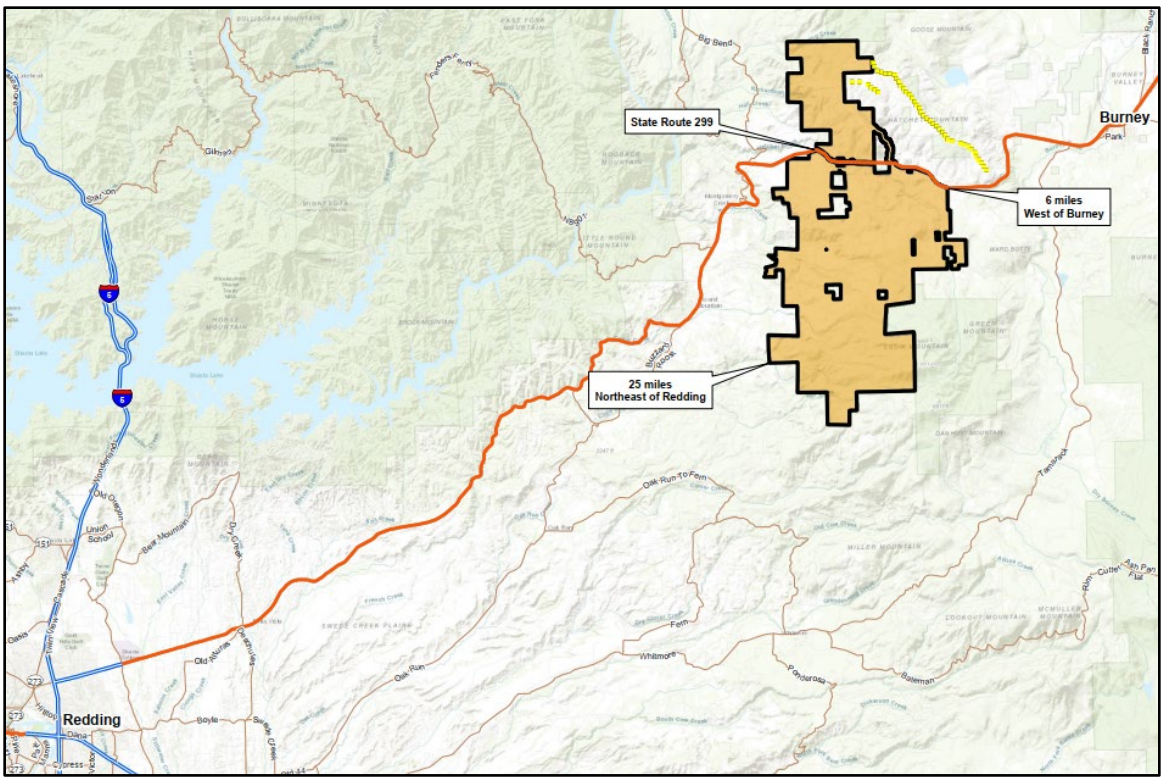
2.1 Project Summary

The Fountain Wind Project is a renewable wind energy generation development proposed by Pacific Wind Development, LLC, within an approximately 30,532-acre, privately-owned area in unincorporated Shasta County. The Applicant has applied for a Use Permit (UP 16-007) to construct, operate, maintain, and ultimately decommission up to 100 wind turbines and associated transformers together with associated infrastructure and ancillary facilities. Each turbine would be no more than 591 feet tall, as measured from ground level to vertical blade tip (total tip height), and would have a generating capacity of 2 to 4 megawatts (MW). The Project would have a maximum total nameplate generating capacity of up to 347 MW. Associated infrastructure and ancillary facilities would include: a 34.5-kilovolt (kV) overhead and underground electrical collector system to connect turbines together and to an onsite collector substation; overhead and underground fiber-optic communication lines, an onsite switching station to connect the Project to the regional grid operated by the Pacific Gas and Electric Company (PG&E), a temporary construction and equipment laydown area, 17 temporary laydown areas distributed throughout the Project site, an operation and maintenance (O&M) facility, permanent meteorological (MET) towers and either Sonic Detection and Ranging (SoDAR) or Light Detection and Ranging (LiDAR) capability, storage sheds, and temporary batch plants. New access roads would be constructed within the project boundary, and existing roads would be improved.

2.2 Project Location

The Project would be located approximately 1 mile west of the existing Hatchet Ridge Wind Project, approximately 6 miles west of Burney, 35 miles northeast of Redding, immediately north and south of California State Route 299 (SR 299), and near the community of Moose Camp and other private inholdings. See **Figure 1**, *Project Location*. Other communities near the Project area include Montgomery Creek, Round Mountain, and Wengler (each approximately 3 miles from the Project area) and Big Bend (approximately 7 miles from the Project area). The Lassen National Forest lies adjacent to the Project area southeast and the Shasta-Trinity National Forest borders the Project site to the north; other surrounding lands are privately owned.

The Project would be constructed on an up-to 2,167-acre Project site (outlined in Figure 1) located within the approximately 30,532-acres that comprise 76 Shasta County Assessor's parcels (APNs). The 76 APNs consist exclusively of private property operated as managed forest timberlands.



SOURCE: Avangrid Renewables, 2019 Fountain Wind Project

Figure 1
Project Location

3. Opportunities for Agency and Public Input

3.1 Pre-scoping Activities

The County initiated pre-scoping activities following receipt of the application for Use Permit No. 16-007. Pre-scoping activities included initial agency and community outreach, the results of which efforts were documented in an Initial Study, and consultation with Tribes pursuant to Assembly Bill (AB) 52 (Gatto, 2014). The Initial Study, initial outreach efforts, and the AB 52 consultation process are summarized below.

Initial Study

Pre-scoping activities included the preparation of an Initial Study. On the basis of the Initial Study, the County determined that preparation of an EIR would be required.

Initial Agency and Community Outreach

Initial agency outreach included communications with: The Burney Fire Protection District, California Department of Fish and Wildlife, California Department of Transportation, Central Valley Regional Water Quality Control Board, Shasta County Assessor/Recorder, Shasta County

Air Quality Management District, Shasta County Fire Department, Shasta County Office of the Sheriff, and the Shasta Mosquito and Vector Control District. Initial community outreach included communications with: The Pit Rive Tribe, Frontier Communications, and the Wintu Audubon Society. Correspondence with these agencies and members of the community is documented in the Initial Study.

Tribal Consultation Pursuant to AB 52

Pursuant to the AB 52 Tribal consultation process, CEQA lead agencies consult with tribes that are traditionally and culturally affiliated with the project area and that have requested consultation pursuant to Public Resources Code section 21080.3.1. The purpose of the consultation is to determine whether a proposed project may result in a significant impact to tribal cultural resources that may be undocumented or known only to the tribe and its members. As set forth in Public Resources Code Section 21080.3.1(b), the law requires:

> *Prior to the release of a negative declaration, mitigated negative declaration, or environmental impact report for a project, the lead agency shall begin consultation with a California Native American tribe that is traditionally and culturally affiliated with the geographic area of the proposed project if: (1) the California Native American tribe requested to the lead agency, in writing, to be informed by the lead agency through formal notification of proposed projects in the geographic area that is traditionally and culturally affiliated with the tribe, and (2) the California Native American tribe responds, in writing, within 30 days of receipt of the formal notification, and requests the consultation.*

The County's AB52 contact list consists of Native American tribes that had submitted written requests for notification of CEQA projects within their geographic area of traditional and cultural affiliation as of December 8, 2017, when the County initiated consultation. The County sent letters by certified mail on December 8, 2017 to two representatives of the Pit River Tribe: Mickey Gemmill[2] and Morning Star Gali.[3] Each letter identified the area within which the Project is proposed as within the Tribe's geographic area of traditional and cultural affiliation. Return receipts for the certified letters indicate the letters were delivered on December 8, 2017. The County received no response to either letter.

[2] Shasta County, 2017a. Letter of Bill Walker, AICP, Senior Planner, Shasta County Department of Resource Management, to Mickey Gemmill, Chairman, Pit River Tribe, regarding Tribal Cultural Resources under the California Environmental Quality Act, AB 52 (Gatto, 2014). Formal Notification of Determination that a Project Application is Complete, pursuant to Public Resources Code §21080.3.1. Available online: https://www.co.shasta.ca.us/docs/libraries/resource-management-docs/projects/fountain-wind-project/ab52/ltrpitrivertribemorningmickeygemmillchairman120717.pdf. December 8, 2017.

[3] Shasta County, 2017b. Letter of Bill Walker, AICP, Senior Planner, Shasta County Department of Resource Management, to Morning Star Gali, Tribal Historic Officer, Pit River Tribe, regarding Tribal Cultural Resources under the California Environmental Quality Act, AB 52 (Gatto, 2014). Formal Notification of Determination that a Project Application is Complete, pursuant to Public Resources Code §21080.3.1. Available online: https://www.co.shasta.ca.us/docs/libraries/resource-management-docs/projects/fountain-wind-project/ab52/LtrPitRiverTribeMorningStarGaliTribalHistoricOfficer120717.pdf. December 8, 2017.

3.2 Scoping Activities

Notifications

On January 15, 2019 the County published and distributed a Notice of Preparation (NOP) accompanied by the Initial Study described above, to advise interested local, regional, state, and federal agencies, as well as the public, that an EIR would be prepared for the Project. The County sent the NOP package to trustee, responsible, and potentially affected federal agencies; to the Governor's Office of Planning and Research/ State Clearinghouse; and to three libraries in the Project area. The NOP and NOP mailing list are provided in **Appendix A**.

The County sent separate notice to a mailing list of 603 recipients that included Tribes, property owners within 2 miles of the Project site, and other interested parties. The direct-mail notification and its mailing list are provided in **Appendix B**.

The County also posted an electronic copy of the NOP and the direct-mail notice on its website: https://www.co.shasta.ca.us/index/drm_index/planning_index/eirs/fountain-wind-project. A screen shot of the website as of January 16, 2019 is included in **Appendix C**. In addition to the NOP, direct mail notifications, and web posting, the County notified the public about the public scoping meeting through newspaper advertisements published in the Record Searchlight on January 15 2019, in the Mountain Echo on January 15, 2019, and in the Intermountain News on January 16, 2019. The newspaper notices are provided in **Appendix D**.

Agency Scoping Meeting

The County held an agency-specific scoping meeting on Thursday, January 24, 2019 at 2 p.m. at the Shasta County Administration Building, located at 1450 Court Street in Redding. Notes of the agency-specific scoping meeting are provided in **Appendix E**.

Public Scoping Meeting

The County held a scoping meeting for members of the public on Thursday, January 24, 2019, at the Montgomery Creek Elementary School, located at 30365 State Route (SR) 299 East in Montgomery Creek. Doors opened to view project information at 6:30 p.m.; the public scoping meeting began at 7 p.m. The presentation slides and "story boards" that were displayed at the meeting were posted on the County's website after the meeting and are provided in **Appendix F**. A transcript of comments made by speakers at the meeting is provided in **Appendix G**.

4. Summary of Scoping Input Received

The NOP and other notifications solicited comments on the scope, content, and format of the EIR. Agencies and members of the public were encouraged to submit their comments to the County by U.S. mail, e-mail, via an on-line tool, or in person at the public scoping meeting. In addition to the oral comments made at the public scoping meeting (Appendix G), written input was received from approximately 150 entities. **Table 1** identifies the agencies, Tribes, and members of the public who submitted input on or before the close of the scoping period. Copies of all written input received is provided in **Appendix H**. All input received on or before end of the scoping period is documented in this Scoping Report.

TABLE 1A
AGENCIES WHO SUBMITTED SCOPING INPUT
FOR THE FOUNTAIN WIND PROJECT

Name	Affiliation	Letter ID	Date
Curt Babcock	California Department of Fish and wildlife	A1	2/19/19
William Solinsky	California Department of Forestry and Fire	A2	1/25/29
Marcelino Gonzalez	California Department of Transportation	A3	2/12/19
Patricia Nelson	California Governor's Office of Emergency Services	A4	2/7/19
Gayle Totton	Native American Heritage Commission	A5	2/12/19
John Waldrop	Shasta County Air Quality Management District	A6	1/16/19

TABLE 1B
TRIBES AND TRIBAL MEMBERS WHO SUBMITTED SCOPING INPUT
FOR THE FOUNTAIN WIND PROJECT

Name	Affiliation	Letter ID	Date
Anguiano, James	Atsuge Band-Pit River Tribe	T1	2/14/19
Davis, Radley	Illmawi Band-Pit River Tribe	T2	2/22/19
Wolfin, Gregory	Illmawi Band-Pit River Tribe	T3	2/14/19
Yiamkis, Tony	Illmawi Band-Pit River Tribe	T4	1/24/19
McDaniels, Brandy	Madesi Band-Pit River Tribe	T5, H	2/15/19
Walters, Raquel	Madesi Band-Pit River Tribe	T6	2/7/19
Cawker, Donna	Pit River Tribe	T7	1/28/19
Forrest-Perez, Natalie	Pit River Tribe THPO	T8	2/14/19
Riggins, Patricia	Pit River Tribe	T9	2/14/19
Johnson, Melany	Susanville Indian Rancheria THPO	T10	2/14/19

NOTE: In identifying individuals as Tribal members, this report relies on self-identification by the correspondents; except for those identified as Tribal Historic Preservation Officers, tribal membership has not been confirmed. Within the Column "Letter ID," the letter "T" refers to the designation of the letter or other communication included in Appendix H, whereas the letter "H" indicates that scoping input also was received at the public scoping meeting as documented in the transcript included in Appendix G.

TABLE 1C
ORGANIZATIONS AND MEMBERS OF THE PUBLIC WHO SUBMITTED SCOPING INPUT FOR THE FOUNTAIN WIND PROJECT

Name	Letter ID	Date
Alward, Lon	P1	2/04/19
Alward, Lori	P2	2/10/19
Alward, Lyda	P3	2/08/19
Sheila	P4	2/14/19
Baga-Weaver, Angel	P5	2/14/19
Baier, Edmond and Irene	P6, H	2/04/19
Baker, Bryce	P7	2/19/19
Baker, Douglas	P8	2/18/19
Baker, Nadine	P9	2/19/19
Baker, Traci	P10	2/18/19
Bales Mountain Quarry	P11	2/11/19
Bates, Linda	P12	2/19/19
Beaver, Linda & Marvin	P13	2/06/19
Benton, Crystal	P14	2/14/19
Billings, Bruce	P15	1/30/19
Bond Weiland, Susan	P16	2/5/19
Bond, Richard & JoAnne	P17	2/18/19
Boyan, Barbara and Craig	P18	2/04/19
Brown, Erin	P19	2/14/19
Brown, Jeremy	P20	2/18/19
Brown, Naomi and Greg	P21	1/19/19
Bucholz, John	P22	2/05/19
Buelow, Teri	P23	2/03/19
Byers, Brook	P24	2/10/19
Carreno, Sabrina	P25	1/24/19
Carter, Nancy	P26	1/30/19
Chamberlain, Mark	P27	1/28/19
Coughlin, Dan	P28	2/16/19
Danielson, Jeanne	P29	2/11/19
Dickson, Kelly	P30	2/18/19
Dorroh, Lynn	P31	2/11/19
Epperson, Ron	P32, H	2/06/19
Evans, William	P33	2/11/19
Fenimore, George	P34	2/13/19
Ferguson, Jon	P35	2/14/19
Ferguson, Lynn	P36	2/13/19
Flood, Laurie	P37	2/12/19
Forster, Carol	P38	2/14/19
Forster, Carol and James	P39	2/14/19
Freeman, Jonathon	P40	2/22/19
Frolich, Jennifer	P41	2/14/19
Gable, John	P42, H	2/02/19
Gheen, Pat	P43	2/13/19
Gifford, Jennifer	P44	2/16/19
Good, Mike and Kathy	P45	2/19/19
Hall, Mike	P46	2/21/19
Henning, Nick	P47	2/22/19
Henrich, Pedro	P48	2/14/19
Holden, Richard	P49	2/22/19
Humphreys, Robert	P50	2/14/19
Jenkins, Deever	P51	1/28/19
Johnson, Steven	P52	2/10/19
Karabats, Janis	P53, H	2/15/19
Kauer, Rick	P54	2/02/19
Kay Douglas, Lorrie	P55	2/20/19
Kloeppel, Robert	P56	2/08/19
Knauer, Chuck	P57	2/6/19
Lammers, John	P58	2/12/19
Lammers, Prudence and Robert W	P59	2/19/19
Lammers, Robert	P60	2/7/19
Lancaster, Gail and Dwayne	P61	2/21/19
Langlois, Lionel	P62, H	2/11/19
Larson, David	P63	1/26/19
Lattin, Jess	P64	2/22/19
Leaf, Seabrook	P65	2/14/19
Loveness, Linda	P66	2/22/19
Lynch, Gina	P67	2/10/19
Lynch, Robin	P68	2/10/19
Lynch, Ryan	P69	2/10/19
MacDonald, Keith	P70	2/22/19
Maher, Mary	P71	2/14/19
Martin, Lindsay	P72	2/14/19
Mazzini, Jessie	P73	1/28/19
McDonald, Lisa	P74	2/08/19

TABLE 1C (CONTINUED)
ORGANIZATIONS AND MEMBERS OF THE PUBLIC WHO SUBMITTED SCOPING INPUT FOR THE FOUNTAIN WIND PROJECT

Name	Letter ID	Date
McVey, Susan	P75	1/24/19
Messick, Elizabeth	P76, H	2/12/19
Micheletti, Monica	P77	2/20/19
Miller, Carol	P78	1/28/19
Murphy, Doug	P79	2/14/19
Murphy, Elizabeth	P80	2/10/19
Murphy, Hannah	P81	2/11/19
Murphy, Morgan	P82	2/10/19
Murphy, Spencer	P83	2/10/19
Narducci, Gary and Sharon	P84	2/11/19
Oliveira, Laureen	P85	2/14/19
Osa, Joseph and Maggie	P86, H	2/13/19
Osa, Maggie	P87, H	2/08/19
Owens, L.A	P88	2/19/19
Palatino, Charles and Cynthia	P89, H	1/31/19
Popejoy, Bill and Brenda	P90	2/04/19
Rains, Randal	P91	1/23/19
Reed, Kevin	P92	2/14/19
Sierra Club	P93	1/27/19
Simonis, Angela	P94	2/14/19
Skalland, Shari	P95	2/22/19
Sours, Judy	P96	1/29/19
Sours, Stan	P97	1/27/19
Spackman, Jeff	P98	2/11/19
Stanford, David	P99	2/22/19
Stapp, John and Sandra	P100	2/11/19
Stein, Bruce	P101	2/10/19
Stoneback, Keith	P102	2/22/19
Stremple, Susan	P103	2/10/19
Stremple, Theresa	P104	2/11/19
Sublette, Karen	P105	2/22/19
Swarts, Myra and Orvil	P106	2/10/19
Swarts Stremple, Myrna	P107	2/10/19
Tassen, Paula	P108	1/30/19
Tavares, Trudy	P109	2/11/19
Taylor, Patricia	P110	2/21/19
Tinkler, Candace	P111	1/28/19
Waldkirch, Lori	P112	1/28/19
Watson, Evan	P113	2/11/19
White, Jaclyn	P114	2/12/19
Wiegand, Jim	P115	2/14/19
Willett, Kathy	P116	2/14/19
Williams, Marvin & Linda	P117	2/4/19
Williams, Ralph	P118	2/14/19
Wintu Audubon Society	P119	2/14/19
Woodward, Anne Marie M.D.	P120	1/20/19

NOTE: Within the Column "Letter ID," the letter "P" refers to the designation of the letter or other communication included in Appendix H, whereas the letter "H" indicates that scoping input also was received at the public scoping meeting as documented in the transcript included in Appendix G.

4.1 Approach to the Consideration of Scoping Input

The County has reviewed the full text of all scoping input received and will consider it in preparing the EIR. Summaries of the issues raised are provided below for ease in review by other agencies and members of the public.

Input Received on Issues Outside the Scope of CEQA

CEQA requires lead agencies in preparing an EIR to analyze significant effects on the environment. For purposes of CEQA, the term "environment" means the physical conditions that exist in the area that will be affected by a proposed project including "land, air, water, minerals, flora, fauna, ambient noise, and objects of historic or aesthetic significance…. The 'environment'

includes both natural and man-made conditions" (Pub. Res. Code §21060.5; CEQA Guidelines §15360). Input on topics that are beyond the scope of CEQA was received during the scoping period. Examples of such input include comments about:

a. Economic changes, such as financial benefits to the community (such as a desire to receive donations from the applicant to support scholarships or community programs, or lower energy costs) or others (such as potential workers or suppliers of Project materials) if the Project is approved (including the owner of the Project site and whether the applicant is a foreign or domestic entity), or declines in tourism-related income. CEQA is clear that potential impacts to property values are beyond the scope of CEQA, no matter how potentially severe they may be [*Porterville Citizens for Responsible Hillside Development v. City of Porterville* (2007) 157 Cal.App. 4th 885, 903].

b. Perceptions of unfair distribution of benefits and burdens of the local community relative to more distant, urban areas in terms of renewable energy production and energy demands;

c. Psychological and social impacts on community character also are beyond the scope of CEQA. *Preserve Poway v. City of Poway* (2016) 245 Cal.App.4th 560. The character of the communities that would be affected by the Project have been described generally in scoping input as reflective of "country living, quiet, pure and clean", "undisturbed by civilization," and as "a refuge from city life." Community character input also was received in connection with changes being experienced in people's expectations regarding the ability to use their neighbors' land (such as increasingly strict anti-trespassing policies);

d. Expressions of favor or disfavor for renewable energy, the Project, an aspect of the Project, or a potential alternative without reference to a change in the environment that would be attributable to the Project; and

e. Non-project-specific comments, including quotations from legal requirements without providing a stated connection to the project, and general feelings about renewable energy, the wind industry, or comments about other energy projects where questions about the reliability of data or other issues may remain.

The County acknowledges its receipt of input that is beyond the scope of CEQA and has included it in the record of materials for consideration by decision-makers even though it will not be addressed in the EIR. The environmental consequences of a project are but one of multiple factors that may be taken into consideration when a Lead Agency is deciding whether or not to approve a proposal.

Input Received on Issues Within the Scope of CEQA

The purpose of scoping is to solicit input as to the scope and content of the EIR, including potential impacts of concern and mitigation measures or alternatives to be considered. This type of input was received during the scoping period and is summarized below. These summaries include "raw" input that has not been vetted for accuracy; they represent to the greatest extent possible commenters' actual input.

a) Aesthetics

Scoping input was received regarding the existing environmental setting, which includes: Daytime and nighttime views of the Hatchet Ridge Wind Project, which are described as visible

from Interstate (I)-5 and locations in Modoc and Siskiyou counties; two major transmission lines that are described as "crisscrossing" the Montgomery Creek/ Round Mountain community before connecting to the regional grid PG&E's Round Mountain substation; the Fountain Fire burn scar; and SR 299. Scoping input regarding regulatory setting suggests that the County consider the General Plan section that addresses the visual effects of all new development.

Scoping input expressed general concerns about impacts to existing daytime and nighttime views, the potential to limit the possibility of SR 299 being designated a scenic highway at some point in the future; and requests to analyze potential changes to views from nearby homes (including private properties in Moose Camp) and to views from geographic locations (including SR 299, Round Mountain, Oak Run, Burney, Mount Shasta, Castle Crags State Park, Redding, Bella Vista, Palo Cedro, Anderson, Cottonwood and I-5, Fall River Mills, Lassen Volcanic National Park, and Big Valley Point).

Commenters suggested that project elements that could trigger changes in aesthetic resources include site preparation activities (e.g., timber removal, road construction), and construction, operation, maintenance, and decommissioning of the proposed turbines, meteorological towers, and overhead power lines. Commenters identified the density and proximity of the proposed turbines to viewers as causing potential impacts, as well as the introduction the motion of turbine blades in the landscape and as perceived as "shadow flicker." Commenters identified the potential for FAA-required safety lighting to affect existing night-sky conditions as a concern for affected residents and other observers. Commenters suggested that temporary disturbances would change views during the time needed for the temporarily disturbed areas to be reclaimed and that permanently-cleared or minimally-revegetated areas (e.g., for the underground and above ground transmission lines) are to be considered. Commenters also suggested that the addition of truck traffic where now there is very little traffic at all would affect the scenic character of the area.

To assess potential cumulative effects, commenters identified the following for inclusion as part of the cumulative scenario specifically with respect to aesthetics: The Hatchet Ridge Wind Project and its impacts, including shadow flicker across SR 299.

To mitigate anticipated impacts to aesthetics, commenters suggested consideration of the following measures: eliminating turbines, relocating them north of SR 299, relocating them further south of SR 299, increasing setbacks, and painting turbine towers and blades a color other than white or with a pattern would have less visual impact.

b) Agriculture and Forestry Resources

No scoping comments were received regarding agriculture resources. Scoping input received regarding forestry resources noted that the site is subject to herbicide use and thinning under existing (baseline) conditions and included expressions of concern that the development of a wind project on the proposed site would: 1) remove trees that have taken years to recover from prior wildfire events, 2) result in tree removal on a much greater scale than if commercial timber harvesting were approved, and 3) result conversion to non-timber-producing use, where the forest conversion could lead to loss of nutrient-rich topsoils, disrupted nutrient cycling, and increased erosion.

To assess potential cumulative effects, commenters identified the following for consideration as part of the cumulative scenario specifically with respect to forestry: the growing scarcity of productive forest lands through timberland conversion, harvesting associated with timber harvesting plans (THPs), and the devastating impacts of recent forest fires, drought, and tree mortality in Shasta County and nearby areas.

c) Air Quality

Scoping input from the Shasta County Air Quality Management District advises the County that the AQMD typically refers to California Health and Safety Code Section 41700 as the guideline when dealing with prohibited discharges, and nuisance complaints, but has not specifically defined "substantial." Regarding the regulatory setting, the AQMD also recommends the following for the County's consideration: Protocol for Review- Land Use Permitting Activities (Nov. 2003), Environmental Review Guidelines- Procedures for Implementing CEQA (Nov. 2003); and Rule 3:2 (Specific Air Contaminants), Rule 3:16- (Fugitive Emissions), Rule 3:31 (Architectural Coatings) and Rule 3:32 (Adhesives and Sealants). Further, all heavy equipment operating on site must be registered under the State of California Portable Equipment Registration Program; on site fuel dispensing and storage must meet California Phase 1 vapor recovery requirements; and, in the event that operations are being conducted in an area containing naturally occurring asbestos, a plan shall be submitted that meets the requirements of the Asbestos Airborne Toxic Control Measure for Construction, Grading, Quarrying, and Surface Mining Operations.

Other air quality-related scoping comments related to the proximity of residential receptors to project emissions from construction materials delivery vehicles (including wide or "super" loads for turbine components) originating outside the county, secondary impacts resulting from increased emissions from other vehicle delays resulting from traffic controls and lane closures required for materials delivery, emissions from construction worker commute trips and construction vehicles, on-site vehicle and equipment emissions for site preparation-related timber harvesting, and dust. Comments noted that dust would be caused by construction work, travel on Project roads in and near Moose Camp (resulting in declining attendance of functions at the social hall and events that include cooking and eating outdoors). One comment noted that the prevailing south-west winds of summer would exacerbate the Project's anticipated dust-related impacts. Another expressed concern that water truck-based applications would not be sufficiently effective in reducing dust impacts during construction or during the life of the Project thereafter.

d) Biological Resources

Scoping input received regarding the environmental setting for the analysis of biological resources identified the fact that the Project site that was replanted after the Fountain Fire, and is maintained with herbicide use and thinning. Existing invasive species in the area include: Scotch Broom, Pampas Grass, Star Thistle and Johnsongrass. Further, the Project area abuts both the Lassen National Forest and the Shasta-Trinity National Forest.

Regarding data inputs to be considered in the analysis, one scoping commenter questioned whether the Applicant's bird point count surveys adequately estimate all avian species that use the project area due to an inconsistency with recommendations in guidance published by the California Energy

Commission. Another commenter suggested that bird count surveys should (but so far do not) account for sand hill cranes' seasonal migration in early spring and late fall. More information was requested about why avian surveys were not conducted of nighttime migration for the Sandhill crane, in light of anecdotal evidence that the migration of this species descends into the proposed turbines' rotor range during storm events in winter. Nighttime migration survey methods (including radar, acoustical and near-infrared) were recommended. Further, scoping comments mention wolverine sitings on Hatchet Ridge, crossings of SR 299, and presence in the Tahoe National Forest, scoping comments suggest that these sitings could indicate recolonization of this species' California habitat may be in progress and, on this basis, request furbearer studies. Other input notes that site terrain and landforms are distinguishable from the Hatchet Ridge Wind Project site, and so information from that project site should be considered with caution in the context of this site. Finally, recognizing that the Project site has the potential to support aquatic, riparian, or wetland habitat, one commenter requested that a preliminary jurisdictional delineation be provided of lakes, streams, and associated riparian habitats potentially affected by the Project including wetlands identification pursuant to the U.S. Fish and Wildlife Service's definition of "wetland" as adopted by the California Department of Fish and Wildlife.

Regarding the regulatory setting, scoping input identifies the following laws as relevant to the analysis: The Endangered Species Act (ESA), Migratory Bird Treaty Act (MBTA), and the Bald and Golden Eagle Protection Act (BGEPA).

Potential impacts of concern identified relate to all manner of flora and fauna, including:

- Vegetation, wetlands, and whether the analysis would consider streams, creeks, peats, bogs and meadows and aquatic habitat for brook trout and other fish;
- Rare, threatened, and endangered plants, and California rare plants that were identified as existing near the northern part of the Project area on U.S. Forest Service lands;
- Elderberry longhorn beetle identified in scoping comments as present along SR 299;
- Fully-protected animals (e.g., ring-tailed cat);
- The pack of gray wolf near Lassen National Park (federally/State endangered);
- Species of Special Concern;
- Invertebrates/insects, fish, amphibian (frogs, salamanders), reptiles, and other wildlife species (birds, mammals);
- common wildlife species (game, non-game, specially-protected species, etc.) also were identified in comments as present in the Project area, including rabbits, fox, raccoon, California Brown bear, wolverine, American marten, badger, mountain lion, bobcat, Rocky Mountain elk, and deer; and
- Wildlife corridor/movement areas and other key seasonal use areas.

Scoping input identifies several avian species in the Project area, including nesting and other raptors (i.e., bald eagles, golden eagles, red-tailed hawks, red kite, osprey, Northern goshawk, Northern spotted owl, great grey owl); Species of Special Concern (e.g., olive-sided flycatcher

and yellow-headed blackbird); yellow warbler, migrating and other waterbirds and fowl (i.e., Sandhill crane, which migrates in early spring and late fall, white pelican, heron, hooded merganser, swan, Canadian geese, and mallards) and other birds, including hummingbirds, woodpeckers, mountain jays and crows.

Scoping comments request that the analysis consider the potential for the proposed turbines to result in mortality, injury, or displacement or other adverse impacts to the avian species that inhabit, nest in, pass or migrate through, or forage within the Project area. Scoping comments request that the analysis estimate the number of birds that would be killed by collisions with different sizes of towers and at different tower densities and layouts and the potential for disturbance to nest sites and foraging habitat from increased human intrusion from traffic, noise, road widening, and the construction of ancillary facilities and structures. Regarding the hoary bat and other bats, scoping input recommends consideration of the work of Curt Babcock. Other input refers to studies suggesting that changes in electric field and air pressure effects in the vicinity of turbine blade tips can burst the capillaries in the lungs of bats that fly near them, and request that the analysis evaluate this potential impact.

Other temporary and permanent impacts of concern were identified as relating to forest habitat, habitat fragmentation, edge effects associated with new or wider roads and other cleared areas, and the potential for the proposed vegetation clearing to increase the amount of light that penetrates the forest floor, which may result in displacement and changes in species composition. Scoping input also suggests that the proposed diversion of water to construct the project would negatively impact biodiversity and that the Project could contribute to cyanobacteria/toxic algae that would harm members of the community. Other impacts identified as being of potential concern relate to Project activities' potential to spread invasive species; introduce noise that, at even moderate levels (40-60 dB) is associated with physiological and behavioral changes in birds, terrestrial mammals, amphibians, and bats; introduce "infrasound," which is sound waves with frequencies below the lower limit of 20Hz that may affect the behavior and well-being of animals including geese, worms, chickens and cows; introduce hazardous features that could trap, displace, or lead to death of wildlife; and introduce artificial lighting that could have adverse impacts to birds and nocturnal species. Scoping comments asked whether the proposed red blinking light technology would disrupt the normal, natural balance of the ecosystem based on comparability to products as "Nite Guard Solar-Powered Night Animal Predator Light," which is claimed to successfully deter and frighten nocturnal species such as owls, coyotes, opossum, raccoons, fox, bobcats, muskrats, bears, cougar, wild boar, mink and weasels. Fisheries dependent on the water quality afforded by the existing ecosystem, scoping input suggests, would be disrupted by the proposed construction activities.

For inclusion in and consideration as part of the cumulative scenario specifically for biological resources, scoping input identifies the permanent and temporary reduction of several thousand acres of habitat as a result of timberland conversion, fires, drought and tree mortality; other sources of avian mortality including buildings, windows, and domestic cats; other sources of bat mortality including mosquito abatement projects dating back to the 1960s; and trend data indicating declines in populations for species such as spotted owl, goshawk, and English peak greenbriar.

Scoping input identifies potential mitigation measures to avoid or reduce potential impacts to biological resources, including whether painting turbine towers and blades a color other than white or with a pattern could reduce bird strike impacts, whether the color of the FAA security lighting could be changed to reduce the attractiveness to birds; and whether a greater carcass search distance could be imposed than previously required to more accurately quantify avian mortality.

e) Communication Interference

Scoping input requests that the EIR analyze whether Project components such as wind turbines or meteorological towers could cause communications interference that adversely affects residents' and others' ability to coordinate with emergency service providers via cell phone, 2-way radio, landlines, or the internet. One comment also asked about potential interference with television reception. Concerns were raised specifically regarding potential interference with the communications infrastructure and communications needs of SHASCOM (the Shasta Area Safety Communications Agency), California Highway Patrol, air ambulance service providers such as PHI and REACH, aviation companies that use the flight path over the proposed site, and Valley Industrial Communications, which repairs and handles repeaters and radio problems for public safety entities such as the Sherriff's Office and SHASCOM.

f) Cultural

Scoping input received regarding Tribal Cultural Resources is summarized in subsection s), below. Scoping input about cultural resources more generally suggests that analysts inquire with the California Historical Research Information System (CHRIS) regarding archeological records, and with the Native American Heritage Commission regarding sacred lands file research and tribal consultation. Potentially affected historic resources were identified as including Moose Camp, official historical sites on the Buffum Homestead that were certified after the 1992 Fountain Fire, and a cabin within the Project site that was built in the 1800s that would have to be demolished. The potential to disturb human remains including Indian burials and burial sites also was identified. Mitigation measures were recommended relating to the potential for inadvertent discoveries and regarding the disposition of non-burial recovered cultural items. Caltrans asked whether a historic resource recordation area report would be required and, if so, requested inclusion in conversations regarding any proposal to include SR 299.

g) Economic and Social Impacts

Expressly in the context of CEQA Guidelines Section 15131(a)'s "chain of cause and effect" provision, the County received scoping input suggesting that the project's impacts to existing scenic vistas would have a detrimental effect on property values that would cause a reassessment of property values and corresponding loss in tax revenues relative to current conditions. Input from a forensic appraiser in Wisconsin was received, and requests for a guarantee of compensation against property loss relating to the Project were made. Additional input was received suggesting that a pattern of behavior exists of targeting socio-economically suppressed areas, and exploiting them for personal gain.

h) Energy

Scoping input received regarding the environmental setting for the analysis of energy, including energy efficiency, includes seven hydropower plants in the Project area (Pit #1 through Pit #7) with additional hydropower plants including the ones located at Shasta Dam, Spring Creek Power plant, Judge Francis Carr Powerhouse, Trinity Dam and Keswick Dam; as well as five privately owned hydropower plants in Shasta County, including Balta on Battle Creek, Kilarc on Cow Creek, Hat Creek, Roaring Creek and Haynes Burney Creek. The existing energy setting also includes Wheelabrator and cogeneration power plant facilities in Shasta County.

Scoping commenters request that the analysis consider fuel use for construction equipment, backup power generation, construction vehicles, and worker transportation to/from the Project site as well as for vehicles idling on SR 299 during materials delivery and as required to start/re-start a turbine. Other comments request disclosure of the difference between estimated and actual power generation from the turbines, including an explanation of the existing sources of energy that would be replaced by this Project; and consideration not only of whether water diverted for Project use would reduce the water going through existing hydropower plants, but also that the transmission of power over long distances is not efficient.

i) Geology and Soils

Scoping input received regarding the environmental setting for geology and soils suggest that landslides and road collapses are not uncommon in the project area and identify the presence of Montgomery Creek formations, which are described as “extremely permeable” primarily alluvial fan deposits of sand and mixed rocks. Comments question whether such deposits are suited for the proposed foundations, suggest that the compaction that would be needed to provide road access throughout the site could alter the current underground water flows to Class 1 streams, and note that applications of pesticides could degrade water quality. A “full geological investigation” is requested to address movement of water throughout the geology.

j) Greenhouse Gas Emissions and Climate Change

The County received scoping comments regarding the existing environmental setting for the evaluation of impacts relating to greenhouse gas (GHG) emissions and climate change, including about annual rainfall assumptions and annual average wind speed.

Input also expressed concern that operation of the wind turbines could result in “localized atmospheric warming” (also referred to as a “heat island effect”) that would affect the snow pack and temperatures required to grow apples. The possibility also was raised that the wind turbulence of turbines located along ridge lines could impact local weather by disrupting normal air flow over ridge tops, that spinning turbine rotors increase the vertical mixing of heat and water vapor, thereby affecting downwind meteorological conditions, including rainfall.

Multiple scoping comments requested disclosure of the Project’s net effect on GHGs, including any reduction of other green sources of energy production (such as local hydroelectric capacity that would have to be throttled back during the operation of the proposed turbines) and any reduction in the site’s GHG sequestration capacity caused by the temporary and permanent

removal of thousands of acres of forest. Comments also requested that the analysis provide a "cradle-to-grave" carbon lifecycle analysis that factors in emissions associated with the mining, manufacture, transportation, and construction of turbines, concrete, rebar, and other materials for the Project.

k) Hazards and Hazardous Materials

Scoping input relating to Hazards and Hazardous Materials suggest consideration of Shasta County's local hazard mitigation plan, which addresses wildfires and other hazards. Potential causes or contributors to hazards were identified as increased truck traffic on Moose Camp roads, activities that would disturb natural deposits of arsenic (which could be released to surface waters), and equipment that could leak of toxic chemicals or flammable oils (such as transformers, turbines, or batteries).

l) Hydrology and Water Quality

Scoping input regarding the existing environmental setting for Hydrology and Water Quality identify a host of headwaters, surface waters, and other sources of drinking water in the Snow Mountain area, including: Hatchet Creek, Montgomery Creek, the South Fork of Montgomery Creek, Goat Creek, Indian Springs, Willow Creek, Cedar Creek, Blue Lake, Little Cow Creek, the North Fork of Little Cow Creek, Mill Creek, Cheddar Creek, Sawdust Creek, and Buffum Creek. Drinking and agricultural water for the 20-family community of Wengler is pulled from Roaring Creek through the Vaughn Ditch. Area waters also are used for recreational activities (swimming and fishing) as well as for aquatic habitat.

There are three existing wells in Moose Camp that provide water for domestic use; an additional well is located at the Caltrans Hillcrest Rest Area. Existing groundwater quality is described as full of iron and minerals that make the water from some wells unsuitable for gardening or domestic use. There is one fire hydrant in the area; it is located at the Halcumb Cemetery in Montgomery Creek.

Regarding the regulatory setting, scoping input requests the use of current reports or other information from the water board regarding the present status of the water table and the Pit River watershed.

Many comments expressed concern about potential impacts to existing water rights and water supplies (including creeks, rivers, ditches, springs, and wells) resulting from hydrologic disturbance caused by construction and other stresses on the aquifer from temporary and permanent clearance of timber, road widening, application of gravel to ground surfaces, compaction of earth, cable trenching and related clearance, transmission line infrastructure and related clearance, excavation for foundations including the burying of concrete, blasting, and Project-caused vibration. Because soils in the area are broken "volcanic rock, fragile and extremely fast draining," there is widespread concern that the use of heavy equipment could change the direction of underground water flows. Concerns about potential impacts caused by Project-related water use (e.g., for dust suppression) were raised, as were concerns about the potential for Project activities to contaminate area waters due to erosion and runoff from

construction-related soil disturbance in the watershed, hazardous materials that could leak or drip onto the ground and then migrate to area waterways or wells, or the proposed use of Round Up, similar defoliants, soil sterilants, or herbicides to clear or maintain land within the Project site.

Regarding cumulative effects specifically to hydrology and water quality, scoping input recommends consideration of onsite and offsite water courses and springs, sediment yields, and water quality in light of existing stresses on area waters, including from illegal marijuana grow operations' water demand and pesticide use (e.g., carbofuran, and neurotoxic insecticide) which contaminate the water.

m) Land Use and Planning

Scoping input asked whether the Project would be consistent, or would conflict, with Shasta County Code Section 17.92.025 regarding use permits for high voltage electrical transmission and distribution projects.

n) Noise and Vibration

Scoping input identified existing potential receptors in Moose Camp that could be affected by increased noise and vibration during the Project's construction, operation, and maintenance. Comments suggested that noise could result from additional vehicles traveling along the main road proposed between the two substations (which would abut residential property) and along the three roads that surround Moose Camp's fence line, from heavy equipment and from the proposed concrete plant; from operation of the turbines (including low frequency sonic and infrasonic noise caused by the blades combined with the creaking and groaning of the structures) and from operation of the power lines (described in scoping comments as the "hissing sound," "constant buzz" and "sizzle and pop" audible in winter or when it is cold or moist). Vibration could be caused by operation of the turbines.

o) Public Health

Scoping input described the existing environmental setting for the EIR's consideration of potential impacts to human health as including the identification of Shasta County and the Round Mountain area as having the highest rates of cancer, neurological disorders, suicide, osteoporosis, and dementia in the state; and the fact that the intermountain community is made up primarily of older citizens, who may be more susceptible to health impacts.

Scoping comments specifically identified questions or concerns relating to blade throw, ice throw, the potential exacerbation of dust-related allergies, and for light pollution to compromise health. Other scoping comments identified concerns relating to electromagnetic radiation (EMF) from high voltage power lines and turbines and their potential to cause neurological problems, cancer, Alzheimer's disease, dementia, Parkinson's disease, and depression. Other comments identified shadow flicker and its potential to trigger epileptic seizures, migraines or affect mental health. Some comments focused on infrasound (i.e., sound waves with frequencies below the lower limit of 20Hz) and the potential it may have to cause neurological and physiological disorders resulting in feelings of sea sickness, annoyance, fatigue, pressure or tinnitus (ear ringing), sleep disturbance or sleeplessness, headaches, or vibroacoustic disease. Other scoping

input identified the use of glyphosate weed killers such as Roundup as having potential to cause cancer and/or deoxyribonucleic acid (DNA) disruption, resulting in sterility and deformities. Concerns about an unspecified condition called "wind turbine syndrome" also were raised as having the potential to cause sleep disturbance, headaches, tinnitus, a sense of quivering or vibration, dizziness, nausea, nervousness, high blood pressure or rapid heartbeat, difficulty with concentration, memory loss, irritability and anger, and seizures.

Potential mitigation measures proposed in scoping comments to address potential health impacts include not build high-powered lines within 1,000 feet of any existing residence and increasing setbacks to 1,500 feet, filtering inverters, and burying collector lines.

p) Public Services

Scoping input regarding Public Services in the Project area note that Cal OES provides community support, including disaster response and recovery, that the local community is served by a volunteer fire department (the Montgomery Creek Fire Company). Concerns expressed relating to Public Services include potential inhibition of the use of the emergency flight care helipad in Moose Camp for transport of sick or injured from Alturas to Redding, preclusion of the use for emergency egress to SR 299 of the road outside the yellow gate to the west of Moose Camp, and whether water diverted for Project use would reduce the water source serving the only fire hydrant in the Project area (located at the Halcumb Cemetery in Montgomery Creek).

q) Recreation

Although there are no parks in the project area, scoping input suggests that the Project would affect areas that provide recreation based on swimming, hunting and fishing, hiking, biking, cross-country skiing, snowmobiling, and bird watching.

r) Transportation

Scoping input received regarding the existing environmental setting for the EIR's analysis of transportation suggest that SR 299 is narrow, of steep grade in the Project area, and subject to commercial accidents on a regular basis. Further, there is a road located within 100 feet of Moose Camp that provides the owner of the Lammer Ranch access to SR 299, and has provided emergency ingress/egress for residents of Moose Camp since the 1930s; this road is "seldom used."

Concerns were expressed about the potential for the Project to result in impacts to transportation during construction, operation, and maintenance. During construction, potential impacts could result from the number and size of loads needed to transport and deliver of turbine components (SR 299) and gravel. Delays could adversely affect emergency vehicles trying to get through town; local users of SR 299 and adjoining roads; and commuters heading to Redding for work, entertainment or shopping. The analysis also should consider delays during the time to repair SR 299 post-materials delivery. Potential impacts during operation and maintenance could be caused by members of the general public wanting to get up close to the turbines (as they do for the Hatchet Ridge Wind Project), regular traffic to/from the O&M Facility (which is proposed on a road located within 100 feet of Moose Camp that provides the owner of the Lammer Ranch

access SR 299 and emergency ingress/egress to SR 299 for residents of Moose Camp) and use of the main road proposed between the two substations (which abuts residential property).

s) Tribal Cultural Resources

Scoping input regarding Tribal Cultural Resources note that natural and cultural resources are indistinguishable from the Pit River Peoples and are a central element of the spirituality, traditional ceremonial practices, religious expressions, history, and identity of the Tribe and Tribal members. Tribal members explain that the Tribe and its nation have deep ties to the area, which they describe as a place of refuge, ceremony, healing, prayer, fasting, hunting, gathering, and other sacred traditional uses. Burial grounds are believed to present in the Project area. Tribal members express concern that the construction, operation, and maintenance of the Project could infringe on the freedom of religion and the cultural practices of the Pit River Tribe and other Indian Tribal Nations in the region and that the Project could adversely affect sacred sites, traditional plants, and the viewshed of mountains held sacred by the Tribe including Yet-Tey-Cha-Na (Lassen Peak) and Kohm Yamani (Snow Mountain). Comments mention an old ridgetop trail connects the Pit River to Goose Valley to the Lassen area and has traditionally been, and continues to be, used to reach remote areas during vision quests. The ridge also is identified as a boundary between the Itsatawi, Madesi and Atsugewi Bands. Birds traditionally important to the Pit River culture (such as eagles and eagle nests, osprey, ducks, and geese) cross the ridge and could be injured or killed by the turbine blades. Deer also migrate across the ridge. Commenters suggest that sounds generated by the Project could disrupt bird and animal patterns, as well as human experiences in the area. Existing conditions identified in comments as contributing to ongoing impacts to tribal cultural resources include burdens from power generating activities associated with the Hatchet Ridge Wind Project, power lines, dams, and PG&E hydroelectric activities.

Scoping input identifies sources of information and relevant regulation of impacts to Tribal Cultural Resources as including federal and state statutes, declarations, executive orders, resolutions, decrees, and conventions; guidance documents provided by the Native American Heritage Commission; and, regarding the ridgetop trail, old General Land Office Maps. The Tribal Historic Preservation Officer (THPO) from the Susanville Indian Rancheria asked whether it is too late to request consultation under AB 52.

t) Utilities and Service Systems

Regarding Utilities and Service Systems, scoping comments ask whether existing electrical infrastructure is adequate to transmit electricity to be generated by the Project reliably and safely once it hits the Round Mountain station operated by PG&E. It is suggested that these lines are at or over electrical capacity during peak times 7 months or more of the year.

u) Wildfire

Scoping input received regarding the existing environmental setting for the EIR's analysis of potential impacts related to wildfire note that the Project is proposed in an area designated by the California Department of Forestry and Fire Protection as a "State Responsibility Area (SRA)," as

a "Very High Fire Hazard Severity Zone (VHFHSZ)," and as within approximately 1.5 miles of the 1992 Fountain Fire at Round Mountain. Existing conditions are windy; the terrain is (up to 25 percent grade). There is a history of lightning strikes and fires, both natural and human-caused, in the area. Options for ingress and egress are limited. Furthermore, the existing forest, which was planted after the Fountain Fire, is mostly pine. Trees are approximately 20-30 feet tall and grow 3-4 feet apart, deer brush and manzanita grow in the understory, and years of pine needles cover the forest floor. It is suggested that the current owners will not allow controlled burns to occur because of the timber value. Regarding the regulatory setting, scoping comments note that Shasta County recently prepared a local hazard mitigation plan that addresses wildfires and other hazards.

Potential Project-related ignition sources identified in scoping comments include: road-building activities (e.g., scraping, grinding, blasting), installation and operation of new electrical infrastructure, the use of existing transmission lines that may sag and reduce vegetative clearance, and addition of turbines in the landscape that might act as lightning rods or malfunction, igniting a fire at such a height that it cannot easily be extinguished. Commenters note that the largest wildfires in the State began under transmission lines, including the Fountain Fire for which this Project is named. Other potential impacts identified include the exacerbation of existing challenges to aerial firefighting by the Forest Service and others, including restrictions on flying near turbines or dropping fire retardant; wildfire impacts on equipment, roads, culverts, fencing, runoff (water quality), and wildfire visual impacts to adjacent landowners.

Suggested mitigation measures include tending the forest before any major construction starts and planting trees appropriate distances apart rather than brush (even if the brush is native to the area). Scoping input suggests that the cumulative scenario for wildfire-related impacts should include ongoing impacts of the Fountain Fire of 1992 and the Camp and Carr fires of 2018.

v) Alternatives

Scoping comments regarding potential alternatives suggested that the EIR evaluate:

i. No Project alternative

ii. Reduced-project alternative (i.e., with fewer turbines and/or a more concentrated placement of turbines);

iii. Modified project alternative that restricts turbines to at least 1 mile from the Moose Camp fence, or moves them to the south relative to the existing proposal or north of SR 299;

iv. Alternative sites, such as off-shore in Central California or on-shore in Modoc County, Tehama County, Contra Costa County's Altamont Pass, Kern County's Tehachapi Pass, Riverside County's San Gregorio Pass, or someplace with less carbon sequestration potential than the proposed conifer and deciduous forest location or repowering the Applicant's existing wind facilities (including Dillon, Tule Wind, Phoenix Wind, Manzana Wind, Mountain View III, and Shiloh);

v. Alternative technologies, such as solar, cogeneration, or increasing hydroelectric generating capacity at existing Shasta County facilities); and

vi. Alternative approaches, including conservation and demand side management and improving the efficiency of existing infrastructure for the delivery and storage of excess power already generated in California.

w) Cumulative Scenario

The EIR will analyze the potential for the Project's impacts to combine with the incremental impacts of other projects to cause or contribute to significant cumulative effects. The cumulative scenario will include ongoing impacts of past projects, as well as the impacts of other present and reasonably-foreseeable, probable future projects. Scoping input suggests that the cumulative scenario should include:

- Timber Harvesting Plans (THPs), including the Terry Cloth 144-acre 99 percent clear-cut THP approved in 2015 along Hatchet Ridge;
- Other wind energy projects, including the Hatchet Ridge Wind Project as well as wind projects in Solano County, the Altamont Pass, and Tehachapi Pass;
- Other power lines, including PG&E's lines into and out of the substation where the Project would connect;
- The area's fire history, including the Carr, Hirtz, and Delta fires as well as the Montgomery Creek fire that occurred in August 2018;
- Other natural events, including volcanic eruptions

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