

October 18, 2021

Shasta County Planning Department
1855 Placer Street Suite 103
Redding, CA 96001

Re: Fountain Wind Project Applicant Proposed Measures

Dear Shasta County Planning Department Staff,

Through ongoing coordination with various environmental stakeholders, ConnectGen has identified several additional applicant-proposed measures related to wildlife resources that focus on ConnectGen's commitment to apply the USFWS Wind Energy Guidelines ("WEGs"; 2012). Not all stakeholders are familiar with the application of the WEGs and how the guidance may be implemented. To provide clarification to stakeholders regarding ConnectGen's commitment to minimizing environmental impacts and to further demonstrate adherence to these volunteered measures, we request that the County include the following additional voluntary measures in the Statement of Conditions specified for Use Permit 16-007. The following conditions would fall within relevant subparts as identified in Exhibit B to Resolution 2021-010:

- subpart Avian Protections
 - The Permittee shall continue informal coordination with environmental organizations, including Wintu Audubon Society and the Shasta Group of the Sierra Club, during the construction and operational phase of the Project to provide annual updates on the status of the Project, and development and implementation of avian plans.
 - Construction and operation plans provided to the Director of Resource Management and CDFW shall also be provided to the Wintu Audubon Society and Shasta Group of the Sierra Club, including the Permittee's Bird and Bat Conservation Strategy, Nesting Bird Management Plan, and Avian Power Line Interaction Committee (APLIC) guidelines report.
 - The Permittee's Bird and Bat Conservation Strategy (BBCS) shall include specific study methodology for Post-construction Mortality Monitoring (PCMM), including both standardized and incidental monitoring.

- subpart Monitoring and Reporting
 - Standardized PCMM shall commence upon commercial operation of the Facility, defined as the date when the project has achieved full and unrestricted commercial operations.
 - During standardized post-construction mortality monitoring, the permittee will develop study methodology and implement surveys following seasonal weather events as a focused effort to detect potential project interactions with migrating sandhill cranes.
 - The Permittee shall implement an incidental monitoring and reporting program for wildlife, as specified in Mitigation Measure 3.4-3a(e). This incidental monitoring and reporting



- program shall be outlined in the BBCS. Incidental monitoring will be performed throughout the duration of the use permit including during construction and operation.
- Results of incidental monitoring may also trigger adaptive mitigation measures should detections indicate exceedance of the avian and bat impact thresholds as identified in Mitigation Measure 3.4-3b(e) and in accordance with the WEGs (USFWS, 2012). Accordingly, the Permittee shall consult with CDFW and USFWS and implement relevant adaptive measures as outlined in the BBCS.

These voluntary measures supplement existing commitments, including those specified in the Shasta County Staff Report's conditions of approval (dated June 22, 2021) and applicant-proposed mitigation measures as identified in the Permittee's Mitigation Monitoring and Report Program (Appendix G of the FEIR). Importantly, we hope these measures provide more detail on Fountain Wind's commitment to environmental stewardship and community coordination.

Respectfully,

John Kuba
Director, Environmental Affairs
ConnectGen LLC

CC:

Henry Woltag, ConnectGen LLC
Rande Patterson, ConnectGen LLC