



November 20, 2009

Dr. Peter Goldmark
Commissioner of Public Lands
Washington Department of Wildlife
1111 Washington Street SE
Olympia, Washington 98504-7041

Re: Radar Ridge Wind Project Lease

Dear Dr. Goldmark,

On behalf of the Seattle Audubon Society we are urging you to pull the current DNR lease for the Radar Ridge Wind Energy Project.

Seattle Audubon does not take lightly our decision to ask you to remove this lease. We fully acknowledge that many tax payer dollars have been spent on this project and there is considerable momentum and political pressure to allow it to go forward. However, we feel that there will be direct mortality of a federally listed species, the Marbled Murrelet (*Brachyramphus marmoratus*), which in turn will likely impact the population of this species over time.

Basic Rational

The proposed Radar Ridge project is not only located in close proximity of an existing Marbled Murrelet concentration, but it is also located in an area of Washington identify in the report "Recommendations and Supporting Analysis of Conservation Opportunities for Marbled Murrelet Long-Term Conservation as critical for species recovery. The authors of this report rated the Nemah MMMA as the highest-scoring area for Murrelet conservation on State Lands in southwest Washington (page ES-12). Additionally, large contiguous blocks of nesting habitat are important features of critical habitat.

"In SWWA (*area of the proposed Radar Ridge project*), DNR lands contain 28% of the existing inland habitat for the depressed Marbled Murrelet population. Substantial habitat restoration across much of the DNR-managed lands is central to achieving conservation objectives." Page ES-10

The Radar Ridge project falls nearly in the middle of this management area. How will the DNR fulfill its obligation for the long-term survival and recovery of this species while having to work around a major wind project in the middle of the recovery area. Locating a wind power project at this location will result in direct

mortality of Murrelets (at least 1 per year according to the project proponents) nesting adjacent to the facility. There is also significant risk of long-term adverse effects to Marbled Murrelet conservation and recovery on a landscape identified as critical for species recovery.

The above mentioned report is a preliminary report that the Board of Natural Resources will use to create a long-term strategy for the recovery of Marbled Murrelets. This strategy and completed EIS are due sometime in 2010 or 2011. We feel it is premature to allow a lease on critical DNR lands and to construct a wind power project in this area before the completion of this comprehensive study and strategy to protect these threatened birds.

Continued Loss of Marbled Murrelet Habitat and Species Decline

Despite the listing of the Marbled Murrelet as threatened in 1992, and implementation of the DNR Habitat Conservation Plan in 1997, the amount of suitable Murrelet habitat has continued to decline throughout the range. The total loss of suitable nesting habitat between 1992 and 2003 was estimated to be about 10% or 226,000 acres of the estimated of 2.2 million acres of suitable habitat in the states of California, Oregon and Washington (McShane et al. 2004). The inability to create new Murrelet habitat in the short term combined with the continued harvesting of occupied and suitable habitat ensures a downward trend in suitable Murrelet habitat into the future. For these reasons it is imperative that current nesting habitats be managed to avoid or minimize adverse impacts to the species.

Marbled Murrelet Nesting Success

The Marbled Murrelet has low fecundity levels across Washington, Oregon, and California as measured by nest success indicates a population that cannot currently maintain itself (McShane et al. 2004). Lower nest success is caused by nest predation, which in turn is affected by forest fragmentation and proximity to human developments (McShane et al 2004). Murrelets also pair bond and have only one chick per year. This critically ties three birds together and the loss of a single adult within this group will likely result in the death of the remaining two birds.

The low fecundity levels, forest fragmentation, predation, human conflict and direct mortality resulting from the Radar Ridge wind project and the responsibility of DNR through their current HCP to protect the Marbled Murrelets strongly lead us to oppose this project.

Discussion of Energy Northwest Science

1. The independent scientific report that you commissioned to look at the environmental survey data and determine the risk to Marbled Murrelets concluded that 87 Marbled Murrelets would fly through the turbines and be

- at risk. After discussion with Hamer Environmental it was concluded that the independent scientists may not have had complete information and slightly overestimated the number of birds at risk. It was concluded that 50 birds not 87 would be in the danger of colliding with turbines or towers on an annual basis or 1500 Marbled Murrelets over the lifetime of the project. The current population of the Nemah nesting area of Marbled Murrelets is approximately 700 birds. This places 14% of the nesting Marbled Murrelets in this area at risk annually.
2. The collision model developed by the Radar Ridge science team basically looks at the flight path of the Marbled Murrelet as a projectile shot out of a canon and determines the probability that it will safely pass through the spinning turbines. This model is being statistically validated for its mathematical merits at Michigan State University. However, this type of validation will tell us nothing about the long term impacts to the Marbled Murrelet population and only tell us if the basic mathematical assumptions of the model are correct. It is our understanding that this model has not been validated in the field and therefore we have no idea how accurate the model is. All models have variability surrounding them. Is this model accurate 5, 10 or 80% of the time? In addition, the model does conclude that some birds will die as they try to pass through the turbine area. It all comes down to your faith in the model, its assumptions and the quality of the original data. We can't help but ask if you had a dart and threw it 50 times through a spinning fan how many times do you think it would pass through untouched. This is the risk we are setting up with the Radar Ridge wind energy project and the federally listed threatened species.
 3. No mention of Spotted Owl surveys or potential impacts to this species have been listed in the project to date. Our discussions with the science team have acknowledged this oversight. We need to ensure all potential impacts are addressed.

Thank you for the opportunity to comment.

Sincerely,

Shawn Cantrell, Executive Director