



December 3, 2009

Ms. Liz Anderson
Grays Harbor PUD
PO Box 480
Aberdeen, Washington 98520

Re: Radar Ridge Wind Energy Project Scoping Comments

Dear Ms Anderson,

On behalf of Seattle Audubon we are providing comments on Radar Ridge Wind Energy Project in Pacific County, Washington, which is located within the Nemah Marbled Murrelet Management Area (MMMA). These written comments add to our oral comments presented at two of the public meetings: November 10, 2009 in Hoquiam, Washington by Shawn Cantrell and November 19, 2009 in Raymond, Washington by Matthew Mega.

The mission of Seattle Audubon is to cultivate and lead a community that values and protects birds and the natural environment. Since 1916, Seattle Audubon has worked to protect birds of our region whose habitats are at risk.

Seattle Audubon supports development of well-designed, appropriately-sited renewable energy projects in Washington state. We were active participants in the development of the Washington Department of Fish and Wildlife's "2009 Wind Power Guidelines" recently completed.

We fully recognize that green energy is an important component of the overall energy portfolio, especially with the passage of I-937. Local PUD's are increasingly looking toward wind power to fulfill their obligations under this act. However, it is Seattle Audubon's primary obligation to our members to ensure that we do not place threatened species in unnecessary harm while we seek alternative energy resources.

As one of the first wind power projects to be considered for a forested landscape in Washington State, this environmental review will need to include a more detailed analysis of several issues that make this proposal different from other wind power projects located on agricultural and/or shrub steppe habitat; experience and knowledge gained from existing projects in the state may not be "transferable" to a project such as this being proposed for a very different environment.

We are concerned that this project will have significant adverse impacts on the Marbled Murrelet (*Brachyramphus marmoratus*), which is listed as threatened under the federal Endangered Species Act. As a result, we oppose this project going forward.

Basic Rational

The proposed project is not only located in close proximity to 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 management area 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. Locating a wind power project at this location will result in direct mortality of Murrelets 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.

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 (2003 estimate; 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. Existing data indicate a population that cannot currently maintain itself (McShane et al. 2004, Beissinger and Peery 2003). 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, Raphael et al.2002). 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 and restore Marbled Murrelet habitat lead us to strongly oppose this project.

Specific Comments on Information Presented at Scoping

1. Commissioner of Public Lands Dr. Peter Goldmark commissioned an independent science panel report to look at the environmental survey data and determine the risk to Marbled Murrelets. In this report the scientists concluded 87 Marbled Murrelets would

fly through the turbines and be at risk. We were troubled that neither the scoping meeting presentations nor associated documents provided to the public made any mention of this report. In a subsequent discussion with Seattle Audubon staff and volunteers, project consultant Hamer Environmental asserted that the independent scientists may not have had complete information and therefore overestimated the number of birds at risk. Hamer 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. Based upon the comments by project proponents at the public scoping meetings and in subsequent discussions with Seattle Audubon staff and volunteers, it is our understanding that the Tucker model (upon which the Radar Ridge collision mortality model is based) has never been validated by testing its predictive value or by hindcasting using monitoring data from an existing windfarm. While this model is currently being statistically validated for its mathematical merits at Michigan State University, this type of validation will tell us nothing about the long term impacts to the Marbled Murrelet population; it will only confirm whether the basic mathematical assumptions of the model are correct. All models have variability surrounding them. Without real world “ground truthing” of the accuracy of this model, it is highly risky to make long-term planning assumptions regarding the mortality impacts on an ESA-listed species. It is our understanding that the model also assumes a static number of Marbled Murrelets flying through the project over the 30 year project life. Yet a key goal of the DNR Habitat Conservation Plan is to increase the number of Marbled Murrelets on state lands, including in the project area. Any reliance on this collision mortality model should fully account for this desired increase in Marbled Murrelets.
3. In the presentation on the federal permitting process by the U.S. Fish and Wildlife Service at November 10, 2009 meeting, it was noted that the “level of controversy associated with the proposed action” is a “trigger” for deciding between preparation of an Environmental Assessment and a full Environmental Impact Statement. As is noted by the two points above, as well as by the June 24, 2009 comment letter from the Pacific Seabird Group to Commissioner of Public Lands Dr. Peter Goldmark, there are very serious concerns by well-respected scientific experts regarding the impacts of this project. A quick review of the public discussion of this project as recorded in public records with the Department of Natural Resources and in the media coverage to-date shows a high degree of controversy associate with the project. Comments by project proponents at the public meetings minimizing and/or dismissing those concerns and downplaying the level of scientific and public controversy do not foster trust in the proponents’ desire to have a full and open public discussion of the project’s environmental consequences.
4. The project proponents invested significant efforts in the bird surveys for the Radar Ridge project. We appreciate that effort and from our perspective it appears that this area does not have an unusually high concentration of raptors, migrating songbirds or other avian species. However, we do not agree with the comparison of this data to other wind projects, from which the project proponents draw the conclusion that the project lands have a very low level of bird usage. This comparison cannot be made since the Radar Ridge project is one of the first to be sited in a coniferous forest habitat. Most of the other

projects dealt with shrub-steppe, agricultural lands or eastern U.S. deciduous forests. Any evaluation of this project proposal should include baseline avian use data from other locations with similar landscape features – near-shore coniferous forests of Washington or Oregon. Without such information, any statements regarding the variety and concentration of bird species at Radar Ridge is misleading at best.

5. No mention of Northern Spotted Owl (NSO) surveys or potential project impacts to this species have been identified in the project to date. Yet in 2006 there was a confirmed detection of this federally listed species in the Nemah River circle, which is in the general project vicinity. In 2007 a federal judge found that NSOs in Southwest Washington were at high risk of extirpation, that Southwest Washington occupies a “critical location” between owl populations in the Cascades and Olympics, and that loss of habitat and populations in Southwest Washington would increase the risk of extinction for owls on the Olympic Peninsula. We are troubled that neither the scoping meeting presentations nor associated documents provided to the public made any mention of these facts, and by the comments made by project proponents at the November 10, 2009 public meeting that no NSOs had been in the area for many years. In subsequent discussions with Seattle Audubon staff and volunteers, project proponents have acknowledged this oversight and pledged to address it. It is essential that the project proponents ensure that all potential impacts of the project are considered. The project proponents have a pro-active responsibility in this regard; you cannot simply rely upon silence by state or federal agency personnel regarding an issue as fundamental as presence (or non-presence) of an ESA-listed species.

Final Thoughts

As stated above we feel strongly that there is too much risk to the Marbled Murrelet population if the Radar Ridge Project goes forward. However, if there is not the political will to stop this project before Energy Northwest and partners spend more public tax payer dollars and submit permits in January of 2010, we call upon the USFW service to ensure a complete EIS of the project is completed.

Thank you for the opportunity to comment. If you have any questions regarding our comments, you can contact me via email at shawnc@seattleaudubon.org or by telephone at 206/523-8243.

Sincerely,



Shawn Cantrell
Executive Director