

# Washington State Audubon Conservation Committee

December 3, 2009

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

## **Re: Radar Ridge Wind Project Lease**

Dear Dr. Goldmark,

On behalf of the Washington State Audubon Conservation Committee (WSACC) we are writing to urge you to pull the current DNR lease for the Radar Ridge Wind Energy Project. WSACC is a partnership of the conservation chairs of the 26 independent Audubon chapters in Washington State. WSACC coordinates and prioritizes legislative advocacy and other policy efforts to protect habitat for birds and other wildlife through conservation action.

Attached is a copy of the resolution adopted by WSACC that highlights the concerns Audubon has regarding this project. We fully understand the need for alternative energy resources to address climate change and we support the development of appropriately-sited renewable energy projects. This project, however, poses too high of risk to the Marbled Murrelet population in the Nemah area of Southwest Washington.

Marbled Murrelets are a threatened species listed under the federal Endangered Species Act. The proposed Radar Ridge project is not only located in close proximity to an existing concentration of Marbled Murrelets, but it is also located in an area of Washington state identified as critical for species recovery. In DNR's 2008 science report *Recommendations and Supporting Analysis of Conservation Opportunities for Marbled Murrelet Long-Term Conservation*, the authors 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 wind project falls nearly in the middle of this management area. Locating a wind power project at this location would be contrary to the recommendation of the Marbled Murrelet Science Team to manage 100% of this area with the goal of creating high-quality nesting habitat. The project would fragment the habitat, with the likelihood of mortality of Marbled Murrelets nesting adjacent to a wind project from direct collisions with the wind turbines, as well as from nest site predation.

In addition, the July 2009 *Independent Science Panel Review of Potential Impacts to Marbled Murrelets relating to the Radar Ridge Wind Resource Area* prepared for you found that 87 Marbled Murrelets annually would fly through the project “strike zone” and be at risk at risk of collision with turbines. While Hamer Environmental, the proponent’s science consultant, believes the number of Marbled Murrelets that will fly through the project area annually is 50 rather than 87 birds, this still represents about 14% of the population in the Nemah area. Placing 14% of this population at risk annually is too risky.

If you have questions regarding this letter, you can contact either Miguel Perez-Gibson at [miguelpg@earthlink.net](mailto:miguelpg@earthlink.net) or Charlotte Persons at [cpersons@yahoo.com](mailto:cpersons@yahoo.com).

Thank you for the opportunity to comment.

Sincerely,

Admiralty Audubon  
Black Hill Audubon  
Eastside Audubon  
Grays Harbor Audubon  
Kitsap Audubon  
Kittitas Audubon  
Lower Columbia Basin Audubon  
North Cascades Audubon  
North Central Audubon  
Palouse Audubon  
Rainier Audubon  
Seattle Audubon  
Skagit Audubon  
Spokane Audubon  
Vancouver Audubon  
Willapa Hills Audubon

## **Resolution to Oppose the Radar Ridge Wind Energy Project in order to Protect Marbled Murrelets**

- *Whereas* the Marbled Murrelet, listed as Threatened in 1992 in California, Oregon, and Washington under the Endangered Species Act, continues to decline in numbers in all its range, especially in the last ten years
- *Whereas* the population of Marbled Murrelets in Southwest Washington State, estimated currently to number only 900 to 1200 offshore in breeding season, is key to maintaining genetic links between Oregon/California and northern Washington populations
- *Whereas* the proposed Radar Ridge Wind Energy Project near Naselle, Washington, is predicted by an independent review by the Washington Department of Natural Resources (DNR) to mortally endanger 87 Marbled Murrelet per year as they fly through the line of wind turbines
- *Whereas* Marbled Murrelets nest on broad branches in the upper canopy of old growth forests near the West Coast and their decline is linked to destruction and fragmentation of this breeding habitat
- *Whereas* a DNR report describes its proposed Nemah Marbled Murrelet Management Area as the best breeding habitat for this species in Southwest Washington, but the Radar Ridge project will fragment this breeding habitat by separating its three areas of old growth forest, including the Nemah Resource Conservation Area, which is part of the Upper Naselle Important Bird Area and is the largest area of old growth remaining on the Southwest Washington coast
- *Whereas* the Radar Ridge project will prevent proposed long-term enhancement of Marbled Murrelet breeding habitat in the Nemah Marbled Murrelet Management Area, making it impossible to encourage tree growth between and around existing old growth areas, especially on the eastern border of the Nemah Resource Conservation Area
- *Whereas* the Radar Ridge project is the first wind energy project proposed for the Washington coast but current regulatory guidance for locating wind projects in Western Washington is inadequate because Washington's Wind Energy Guidelines were developed for conditions in Eastern Washington and the state's Habitat Conservation Plan does not cover wind energy generation

### ***Therefore be it resolved that the Washington State Audubon Conservation Committee***

Opposes the permitting and building of the proposed Radar Ridge Wind Energy Project on DNR land near Naselle, Washington, as it was presented in July and August 2009 by Energy Northwest

Encourages the enhancement of breeding habitat in the Nemah Marbled Murrelet Management Area and other proposed Marbled Murrelet Management Areas by long-term tree cultivation around and connecting old-growth areas

Supports the creation of better regulatory guidance for siting wind energy projects in Washington State, particularly in Western Washington, in order to protect all birds and wildlife, but especially populations at risk of extinction

And that this position shall be expressed by the Washington State Audubon Conservation Committee in communications with elected representatives, discussions with appointed officials, and comments provided, when appropriate, to government agencies.