

Local Wind-Energy Project Needs Your Input
Help Reduce Impacts of Skookumchuck Wind Turbines on Protected Birds

RES-Americas proposes to install 38 wind-energy turbines on ridge tops in northern Lewis County, with part of the infrastructure in Thurston County. Like National Audubon Society, the Black Hills Audubon Society supports wind-energy projects as long as the direct damage to birds from the turbines is appropriately minimized and mitigated.

Lewis County has determined that the project will have a “significant adverse impact on the environment” and will be preparing a draft Environmental Impact Statement (dEIS). The U.S. Fish and Wildlife Service is also preparing a dEIS because RES-Americas is seeking an Incidental Take Permit for the protected Marbled Murrelets, Bald Eagles, and Golden Eagles.

The public has been invited to comment on the scope of both these EIS. **Your input is important to help these agencies better evaluate the potential impact of this wind-energy project on the environment.** Black Hills Audubon has serious concerns about the impacts to wildlife, especially to protected Marbled Murrelets, Bald Eagles, Golden Eagles, and other species of concern.

Please send Comments to help ensure the EIS includes broader and deeper analyses of the impacts on the following species occurring in the project area:

- Marbled Murrelets (state endangered, federally threatened)
- Bald Eagles (federal species of concern)
- Golden Eagles (state species of concern)
- Peregrine Falcon (federal species of concern, state sensitive species)
- Northern Goshawk (state candidate species)
- Olive-sided Flycatcher (federal species of concern)
- Pileated Woodpecker (state candidate species)
- Vaux's Swift (state candidate species)
- Townsend's Big-Eared Bat (state candidate species)
- Long-eared Myotis (federal species of concern)
- Long-legged Myotis (federal species of concern)

(Note: Most of these species are also listed as Species of Greatest Conservation Need by the Washington Department of Fish and Wildlife).

Deadlines for Comments are VERY SOON! The deadline for submitting scoping comments to Lewis County is May 31 and to the USFWS June 4. You can submit the same comments to both lead agencies. You do not have to be a resident of Lewis or Thurston Counties to submit comments.

For Lewis County, send your comments by **Thursday, May 31** via email to karen.witherspoon@lewiscountywa.gov or by US mail to Lee Napier, Director, Lewis County Community Development Dept., 2025 NE Kresky Ave., Chehalis, WA 98532.

For USFWS, send your comments by **Monday, June 4** via email to wfwocomments@fws.gov (include “Skookumchuck Wind” in the subject line) or by US mail to U.S. Fish and Wildlife Service, c/o Mark Ostwald, 510 Desmond Dr. SE, Suite 102, Lacey, WA 98503.

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Comments for scope of Environmental Impact Statements of Skookumchuck Wind Energy Project

Marbled Murrelets:

- The turbine-avoidance rates of Marbled Murrelets should be reanalyzed; RES-Americas’ radar study assumes artificially high avoidance rates based on their study of flight patterns and behaviors of birds dissimilar to Marbled Murrelets.
- Even RES’s current underestimation of take of murrelets (1-3 mortalities *per year*, not counting the deaths of nestlings that starve after losing a parent) could easily eliminate the murrelet population nesting adjacent to the project site over the 30-to-55-year project period.
- The EIS should include analyses of the impact on protected species during the construction phase of the project since there is documented evidence that Marbled Murrelets collide with stationary objects including power and guy lines and moving objects including wind turbines and vehicles.
- The EIS should analyze the effect on Marbled Murrelets of curtailing wind turbine operation during the species’ peak commute times between their marine foraging areas and nest sites (from one hour before sunrise to two hours after official sunrise and from one hour before official sunset to one hour after official sunset) during the breeding season (April 1 through September 23). This curtailment would also benefit other protected and vulnerable bird and bat species and should be incorporated into at least one EIS alternative.

- The five turbines to be sited closest to known nest sites (within the range of radar survey station #10) and/or other turbines with a high frequency of Marbled Murrelet detections can be relocated or eliminated from the project to reduce impact on this species. EIS alternatives should evaluate how much these actions can minimize annual take estimates.

Bald Eagles and Golden Eagles

- The EIS should examine why the level of take proposed by RES-Americas is so high—4-5 Bald Eagles and 1 Golden Eagle *per year* for the 30-55 years of operation. RES-Americas should implement the eagle-detecting technology as soon as it begins operation of the turbines and not wait, as they have stated, for two years or until they approach the take limit that will be set USFWS.
- The SWEP should fully comply with the *Eagle Conservation Plan Guidance* published in 2013 by the USFWS, for the siting, construction, and operation phases of the project.
- Threats to eagles from direct disturbance affecting nesting, foraging, migration and dispersal should be included in the EIS *in addition* to direct mortality threats from collision with the turbines.
- The EIS should evaluate how the project can implement the most avian-friendly standards for the new 17-mile transmission line poles.

Other Bird Species:

- The EIS should include analysis of the impacts of the turbines and related infrastructure on the following avian and bat species:
 - Peregrine Falcon (federal species of concern, state sensitive species)
 - Northern Goshawk (state candidate species)
 - Olive-sided Flycatcher (federal species of concern)
 - Pileated Woodpecker (state candidate species)
 - Vaux's Swift (state candidate species)
 - Townsend's Big-Eared Bat (state candidate species)
 - Long-eared Myotis (federal species of concern)
 - Long-legged Myotis (federal species of concern)

Bats:

- The Bird and Bat Conservation Strategy RES-Americas has stated it intends to create for the project *separate* from the EIS and *after* the construction phase of the project. This strategy should be created *within* the framework of the EIS and *prior* to the construction phase.

- The EIS should include a more rigorous study of bat activity to take into account the availability and proximity of bat roosting or foraging habitat for more accurate estimate of the level of take.

General Comments:

- Before construction of the project is approved, the EIS should evaluate the potential impact of *all* project-related infrastructure within the 20,000-acre project area over the course of the 30-55 years of the project on *all* sensitive and protected species as well as all migratory bird species.
- The EIS should include analyses of birds colliding with turbines and related infrastructure and also being electrocuted by project infrastructure. The analyses should be based on the best-available and peer-reviewed science, and should exclude data collected from the former northern ridge of turbines).
- The EIS should include a more rigorous study, commissioned by RES-Americas, for more accurate estimate of the level of take of Marbled Murrelets, Bald Eagles, Golden Eagles, Bats, and migratory avian species at the project site.
- The EIS should include effective methods for detecting wildlife collisions with turbines and other project infrastructure –methods that are critical for measuring take for the full duration of the permit. The methods should help account for the decay and scavenging of carcasses in order to avoid underestimating collision or electrocution rates.
- The EIS should consider alternative adaptive management measures in order to ensure mitigation fully offsets all impacts of the project, especially if take exceeds the level permitted.

Find more information on this project from Lewis County Community Development [here](#).
Find more information on this project from USFWS [here](#).