



U.S. Fish and Wildlife Service  
c/o Mark Ostwald  
510 Desmond Dr. SE, Suite 102  
Lacey, Washington 98503

31 May 2018

**RE: Scoping comments for EIS / Skookumchuck Wind Energy Project, WA**

On behalf of the Pacific Seabird Group (PSG), we are providing scoping comments on the Environmental Impact Statement for potential Skookumchuck Wind Energy Project proposed for Lewis and Thurston Counties, Washington. We are concerned that this project could significantly impact the Marbled Murrelet (*Brachyramphus marmoratus*), which is currently listed as threatened under the federal Endangered Species Act (ESA) and endangered under the state of Washington. Locating a wind power project near Critical Habitat in the Mineral Block portion of the National Forest and private lands, near known nesting sites, will likely result in direct mortality of murrelets as well as eagles (*Haliaeetus leucocephalus*, *Aquila chrysaetos*). There is also significant risk of long-term adverse effects to Marbled Murrelet genetic conservation and species sustainability on a landscape identified as critical for species recovery. Although we recognize the benefits of developing alternative sources of “green energy,” including wind power, we strongly oppose locating wind turbines in this area.

PSG is an international, non-profit organization that was founded in 1972 to promote the knowledge, study, and conservation of Pacific seabirds. It has a membership drawn from the entire Pacific basin, including Canada, Mexico, Chile, Russia, Japan, China, Australia, New Zealand, and the USA. Among PSG's members are biologists and scientists who have research interests in Pacific seabirds, government officials who manage seabird refuges and populations, and individuals who are interested in marine conservation. Since 1986 PSG has included a Marbled Murrelet Technical Committee, which is itself composed of several working groups, that act on the status, distribution, and monitoring protocol for the Marbled Murrelet. PSG also identifies and facilitates research, addresses conservation problems related to this species, and acts as a liaison between research and government. PSG has served as an unbiased forum for government, university, and private sector biologists to discuss and resolve issues related to Marbled Murrelet conservation along the Pacific coast of North America.

We are very concerned that the positioning of the 38 wind energy turbines spanning over nine miles along on a ridge located in the vicinity of designated Critical Habitat poses a significant risk of collision to Marbled Murrelets transiting to and from marine foraging areas and nesting sites. The closest proposed turbine locations are 0.4 miles from a known Marbled Murrelet nesting site. Past survey efforts have documented a minimum of seven sites occupied by murrelets in or near the Mineral Block area, indicating that the area supports a local population of murrelets with nesting fidelity to this landscape. Much of the critical habitat on U.S. Forest Service land has not been surveyed, and is assumed to be potential nesting habitat that likely supports additional birds not currently documented.

Based on radar studies conducted in 2013 and 2014 by ABR, Inc., and a 99% avoidance rate, this yields a conservative, estimated rate of 0.25 murrelets fatalities per year, for all the units. Taken together over the 30-year life of the Incidental Take Permit, this results in the loss of seven Marbled Murrelets—about equal to the number of occupied sites—which could lead to the extirpation of the local population. In conversations with regulatory agencies, as many as three murrelet mortalities per year have been predicted due to the project, which results in the death of 90 murrelets over the life of the project.

A major gap in Marbled Murrelet population distribution already occurs in southwest Washington and northwest Oregon because of the reduced amount of remaining suitable nesting habitat. This gap in suitable habitat could limit population dispersal, resulting in a genetic bottleneck. In February 2017, Washington state listed the Marbled Murrelet as endangered in recognition of the vulnerable nature of local populations. Building turbines near occupied sites and federal critical habitat is likely to further adversely impact local murrelet populations. In order to ensure the survival and recovery of the Marbled Murrelet, we recommend the following recommendations be addressed in the EIS with discussion and some analysis of alternatives:

- A) situate turbines at least one mile away from occupied murrelet sites
- B) curtail turbine operation during the breeding season (April–September?), especially nearest the occupied sites
- C) create robust mitigation plans that truly compensate for all potential losses of murrelets, as well as eagles
- D) change design to non-lethal structures, with shorter and/or slower rotating or twisting blades.
- E) follow Best Practices for Wind Energy  
([https://www.fws.gov/habitatconservation/windpower/Wind\\_Turbine\\_Guidelines\\_Advisory\\_Committee\\_Recommendations\\_Secretary.pdf](https://www.fws.gov/habitatconservation/windpower/Wind_Turbine_Guidelines_Advisory_Committee_Recommendations_Secretary.pdf))

In conclusion, we feel the Skookumchuck site needs to be reconsidered. Additionally, we recommend a change in design to reduce mortality, with shorter and/or slower rotating or twisting blades. Without protection from further loss, the Marbled Murrelet is likely to become adversely impacted further, reducing chances of recovering the Washington population in the foreseeable future.

Sincerely,



Mark J. Rauzon  
Vice Chair for Conservation  
Pacific Seabird Group  
[conservation@pacificseabirdgroup.org](mailto:conservation@pacificseabirdgroup.org)