



Pacific Seabird Group

Dedicated to the Study and Conservation of Pacific Seabirds and their Environment

Karen Witherspoon, Senior Project Planner
Lewis County Community Development Department
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Chehalis, WA 98532
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Re: Skookumchuck Wind Energy Project DEIS

November 29, 2018

Dear Ms. Witherspoon:

The Pacific Seabird Group (PSG) is writing to express our comments on the Draft Environmental Impact Statement (DEIS) for the Skookumchuck Wind Energy Project (SWEP).

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. 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 composed of several working groups that act on the status, distribution, and monitoring protocol for the marbled murrelet (*Brachyramphus marmoratus*). 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.

Given that federal guidelines governing wind energy development are voluntary, not mandatory, the Applicant's efforts to obtain take permits from the U.S. Fish & Wildlife Service for this project are commendable and may help set an important precedent for future wind-energy projects. However, we are concerned about several issues in the DEIS, and do not underestimate the significance of this project to set a precedent for future wind-energy projects, particularly those adversely impacting special-status marbled murrelet in Washington State. The State's populations are declining at a rate of 4% per year (Pearson et al. 2018), emphasizing the need to provide security to murrelets and their habitat in both the short- and long-term.

We appreciate the downward adjustment of the turbine-avoidance rate of marbled murrelets, the new curtailment scenarios intended to minimize their "take" and the Applicant's exploration of novel mitigation measures to offset the take of marbled murrelets. However, we are concerned that the level of proposed take of marbled murrelets – 2,496 per year for 30 years during the operational phase of the project – may accelerate the extirpation of the species in Southwest Washington. Over time, even low rates of project-associated murrelet fatality could lead to the eventual loss of nesting marbled murrelets within this portion of its range. Such an impact would

likely reduce the potential for recovering this listed species.

We also request that the EIS:

- Include an updated Population Viability Analysis (PVA) to assess the impacts to this local population of the loss of the estimated 90 murrelets from take during the 30-year lifespan of the project.
- Include research on possible meta-populations of murrelets at a scale smaller than two Marbled Murrelet Conservation Zones designated by the *Northwest Forest Plan* and or Marbled Murrelet Management Areas designated in the *Science Team Report*.
- Ensure that this project does not exacerbate habitat fragmentation in southwest Washington and northwest Oregon where suitable nesting habitat is already highly altered.
- Include an analysis of the post-sunrise radar data collected during the 2013 and 2014 radar studies so that the Applicant can consider evening curtailment scenarios.
- Analyze the effect of curtailment of turbines during both morning *and* evening activity period (from one hour before official sunset to one hour after official sunset) during the official breeding season (April 1 through September 23)—not just the period before and after sunrise.
- Reconsider how much mitigation is necessary to offset the take of marbled murrelets in terms of acres of suitable habitat acquired and in terms of number of derelict nets removed since initial calculations possibly overstate both the productivity rate and the breeding age of murrelets.

Again, we appreciate the efforts made to create green energy and attempt to mitigate for disturbances, but we believe a rigorous EIS process will set proper precedent and ensure minimal impact for decades to come.

Thank you for your consideration.

Sincerely,

A handwritten signature in black ink, reading "Mark J. Rauzon". The signature is fluid and cursive, with the first name "Mark" and last name "Rauzon" clearly distinguishable.

Mark J. Rauzon
Vice-Chair for Conservation
Pacific Seabird Group
conservation@pacificseabirdgroup.org