



State of Washington
Department of Fish and Wildlife

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September 17th, 2010

Stephan Posner
EFSEC
905 Plum Street SE
Olympia, Washington 98504-3172
efsec@commerce.wa.gov

SUBJECT: Whistling Ridge Energy Project Draft Environmental Impact Statement: EFSEC Application 2009-01

Dear Mr. Posner,

The Washington Department of Fish and Wildlife (WDFW) has reviewed the above-referenced documents and offers the following amended comments at this time. This letter replaces the previously submitted August 27th, letter from WDFW. Other comments may be offered as the project progresses.

WDFW has carefully reviewed the habitat evaluation prepared by the applicant. The Whistling Ridge site is a forested site managed for over 100 years. It is not in a natural or native coniferous forest condition. The pre-project assessment and avian/bat use surveys are consistent with standard protocols utilized throughout the U.S. and are consistent with the WDFW Wind Power Guidelines (WDFW 2009). Because the relationship between avian use and mortality has been reasonably consistent across other habitat types and locations, it is likely that the relationship between avian use and mortality would be similar to that evaluated in other projects. While no similar data exist for constructed wind energy projects in managed coniferous forest habitats that might help inform impact predictions for Whistling Ridge, as we previously confirmed in the attached letters, WDFW confirms that these data represent the best available science for predicting avian impacts at Whistling Ridge. Therefore, if the WRWRA is constructed, WDFW anticipates the opportunity to better understand the relationship between wind energy development in western coniferous forests and wildlife response.

WDFW would like to emphasize that fluctuations in raptor populations, as well as other avian species, may result in greater mortality than what is predicted in the *Final Report*. As a result, operational controls may be necessary to address avian mortality that exceeds predicted mortality.

In closing, WDFW would like to acknowledge that the applicant has submitted a preliminary mitigation plan that we are currently reviewing. This mitigation proposal was developed consistent with the WDFW Wind Power Guidelines at a 2:1 replacement ratio. The preliminary mitigation plan encompasses approximately 100 acres in Klickitat County 12 miles due east of the project site. The mitigation site is forested with Oregon White Oak with some Douglas fir and Ponderosa pine and shares a portion of its northern boundary with 40 acres of WDNR land and. This mitigation site provides habitat for several PHS entries including Western gray squirrels. Additionally, the site includes the fish-bearing Silva Creek, a tributary to the Klickitat River.

We look forward to working with applicant as this project moves forward.

Sincerely,

A handwritten signature in black ink, appearing to read "Travis Nelson".

Travis Nelson
Renewable Energy Section Manager