

BEFORE THE STATE OF WASHINGTON
ENERGY FACILITY SITE EVALUATION COUNCIL

In the matter of)	SEATTLE AUDUBON SOCIETY'S
Application No. 2009-01)	OPENING STATEMENT
)	
WHISTLING RIDGE ENERGY LLC)	
)	
WHISTLING RIDGE ENERGY)	
PROJECT)	
_____)	

The mission of Seattle Audubon is to cultivate and lead a community that values and protects birds and the natural environment. Our members have a long history of engagement on forest-related issues in Washington state and an on-going interest in the inter-relationship between bird habitat and human development activities in the forested landscape.

As one of the first wind power projects to be considered for a forested landscape in Washington state, this proceeding needs to include a more detailed analysis of several issues that make this proposal different from other wind power projects located on agricultural and/or shrub steppe habitat; experience and knowledge gained from existing projects in the state may not be “transferable” to a project such as this being proposed for a very different environment.

We recognize the significant threat climate change poses to birds and bird habitat, including threatened and endangered bird species. That is why we support well-designed, appropriately-sited renewable energy projects as a critical step in reducing carbon emissions.

Seattle Audubon is greatly encouraged by the potential for this project to avoid the emissions from combustion of an estimated 114,000 barrels of crude oil or 654 million cubic feet of natural gas, leading to the displacement of over 131,000 tons of carbon dioxide annually. The beneficial biological impact of such a displacement to birds and other wildlife in the region appears significant.

We are concerned, however, about the potential adverse impacts of this project on sensitive bird species and the loss of wildlife habitat. For example, a 2010 survey of state Department of Natural Resources (DNR) land immediately adjacent to the proposed project site detected the presence of a Northern Spotted Owl, a threatened species under the federal Endangered Species Act. In addition, the olive-sided flycatcher (a federal species of concern) and the Vaux’s swift (a state candidate species for listing) were both detected at the project site during multiple avian surveys, with the majority of detections within the rotor swept area.

The project would entail approximately 384 acres of forest land being developed for wind turbine foundations, connecting roadways, overhead and underground transmission lines, operation and maintenance yard, and substation. This includes the permanent loss of 60.7 acres of habitat, as well as the temporary loss of another 53.6 acres of habitat.

As the Council considers whether to recommend site certification for this project, and if so what conditions should be included, it is essential that you fully evaluate the impacts the project would have on wildlife. You should identify appropriate avoidance and mitigation measures as well as prescribe the means for monitoring the effects of project operation in order to assure compliance with the certification.

Key avian and wildlife issues for you to consider during this process include:

- Specific details regarding the wind turbines to be allowed at the project site, including how different combinations of turbine sizes, numbers, and locations can best meet the identified minimum necessary project capacity while minimizing the habitat disruptions. Reducing the number of turbines from the proposed 50 offers the potential to significantly reduce the amount of habitat impacted, including avoiding the loss of any suitable northern spotted owl habitat as well as eliminating turbine locations in close proximity to the DNR lands, thereby lessening the potential to disturb the owl in the area.
- Precise details of the habitat mitigation package, including the appropriate type, amount and location of replacement habitat to be given permanent legal protection through a conservation easement or other enforceable means.
- Post-construction avian monitoring, including the duration and scope of the mortality studies at the project site as well as the need for study of *indirect* project impacts such as species displacement from territory and cumulative impacts.
- Specific details regarding formation of a Technical Advisory Committee (TAC), including sufficient funding for the TAC, necessary lifespan of the TAC, identification of the range of adjustments the TAC would be authorized to make to potential mitigation and monitoring requirements, and composition of the TAC to include representatives from all appropriate stakeholders.

As previously noted, the Whistling Ridge project is one of the first wind power proposals to be considered for a forested landscape in Washington state. In light of this, the Council should use this proceeding to ensure that you bring a fresh analysis to your certification recommendation. You have the opportunity and the responsibility to address the unique challenges of developing a wind power project on Northwest coniferous forest lands, thereby setting an appropriate standard for future project proposed for similar landscapes.