

BEFORE THE STATE OF WASHINGTON
ENERGY FACILITY SITE EVALUATION COUNCIL

In the Matter of Application No. 2009-01
of
WHISTLING RIDGE ENERGY LLC
for
WHISTLING RIDGE ENERGY PROJECT

EXHIBIT NO. 22.00E
ERRATA SHEET FOR PREFILED
DIRECT TESTIMONY OF K. SHAWN
SMALLWOOD, PH.D

**ERRATA SHEET FOR
PREFILED DIRECT TESTIMONY OF WITNESS #22
K. SHAWN SMALLWOOD, PH.D**

**ON BEHALF OF
INTERVENORS FRIENDS OF THE COLUMBIA GORGE
AND SAVE OUR SCENIC AREA**

Q. Do you have any corrections to your testimony?

A. Yes, I would like to make two corrections to my prefiled direct testimony (Exhibit No. 22.00).

First, I would like to correct the last full paragraph on page 2 to read as follows:

Yes. The Application appears to have relied on two types of empirical evidence to predict wind turbine-caused impacts at the proposed 75 MW Whistling Ridge wind energy project. These lines of evidence included a model based on fatality rates regressed on utilization rates and the use of exposure index values among species seen at the site. At other projects, the consultant also presumably relied on a comparison of raptor nest density to nesting densities at other wind project sites. However, these approaches have led to inaccurate predictions of project impacts at other locations, and therefore should be examined carefully before relying on them yet again.

1 Q. Would you like to explain this correction?

2 A. In my testimony, I addressed the general approach used by WEST to predict fatality rates
3 at wind farms, which appeared to consist of three types of empirical evidence, including a
4 regression between fatality rates and utilization rates, a comparison of exposure index
5 values, and a comparison of nest densities. This discussion was directed to my Table 1,
6 which listed both predicted and measured fatality rates at multiple wind farms. I was
exploring the possible reasons why predictions were so often proven wrong. In the final
draft, I changed some wording and inadvertently gave the impression that all three lines of
evidence were also used at Whistling Ridge.

7 It does not appear that WEST used nest density as a line of evidence at Whistling Ridge,
8 perhaps because WEST was not tasked with performing nest surveys.

9 My discussion of all three lines of evidence remains perfectly reasonable in the context of
10 Table 1, but I needed to clarify that nest densities were not compared at Whistling Ridge.

11 Q. What is your other correction?

12 A. I would like to change the paragraph that starts at the bottom of page 27 and carries over
to page 28 to read as follows:

13 *Johnson and Erickson (2008) did not provide a Partners in Flight estimate of the*
14 *population size for golden eagles on the Columbia Plateau Ecoregion within Washington*
15 *and Oregon because golden eagle fatalities had yet to be documented among wind*
16 *turbines on the Columbia Plateau. However, golden eagle fatalities were subsequently*
17 *documented, so the 2010 version of Johnson and Erickson's cumulative impacts analysis*
included a golden eagle population estimate, which was 1,700. Without targeted surveys
across roadless areas of the Columbia Plateau, there is no way to verify the accuracy of
this estimate, nor does this estimate include an uncertainty range.

18 Q. Would you like to explain this correction?

19 A. Yes. I discovered that I made a math error (specifically, a mistaken decimal place) in
20 preparing this part of my original testimony. An accurate calculation yields the number of
square-kilometers per eagle pair at about 230. I mistakenly calculated the number at 23.0.
21 My statements in the rest of the paragraph were based on the mistaken number and were
therefore unfounded.