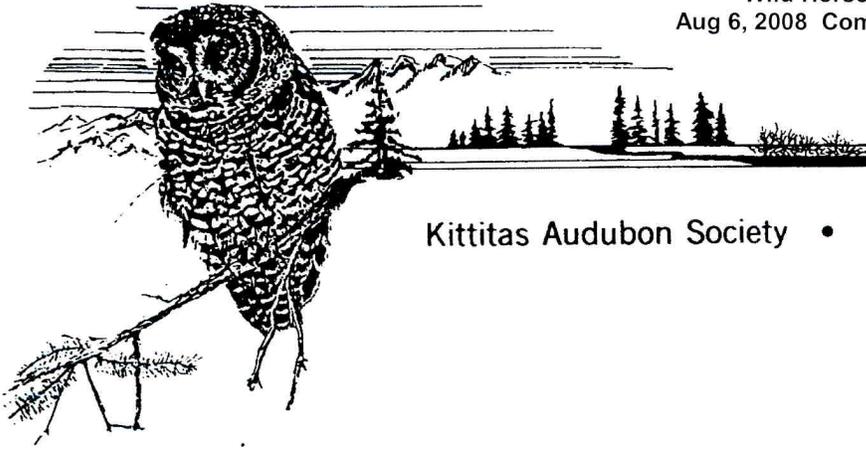


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AUG 08 2008

Kittitas Audubon Society • P.O. Box 1448 • Ellensburg, WA 98926



August 8, 2008

Jim Luce, Chair  
Washington State Energy Facilities  
925 Plum Street SE  
Building 4  
PO Box 43172  
Olympia WA 98504 – 317

Re: Wild Horse Expansion Request

Dear Chairman Luce and Members of the Council:

Kittitas Audubon Society (KAS) is one of the parties to the joint letter submitted to the Council at the August 6, 2008 public hearing on PSE's request to expand the Wildhorse wind farm. KAS members were actively involved in the development of the joint letter, and are keenly interested in how EFSEC responds to the issues raised. Mr. Robert Kruse, in his testimony representing us, affirmed support for wind power sited properly where safeguards to protect natural resources are prior established and enforced.

You are perhaps aware KAS wrote in opposition to establishing the Wildhorse wind farm. From our role as an organization focused on wildlife protection, we didn't see adequate wildlife studies having been performed – for example the one-year's monitoring of bird sightings over the affected area accepted as a meaningful ornithological assessment of conditions to serve as a predictor of events to come. Longer studies with more sophisticated technical investigations needed to address migratory patterns (including night time) were dismissed as too expensive. The reality is that the drive and momentum to expand and industrialize exceeds society's willingness to seriously compromise in favor of protecting natural resources especially wildlife. How else to explain the precipitous decline in bird populations and a willingness to move aggressively into the most rapidly-disappearing natural habitat – shrub steppe.

Wildhorse is now a functioning wind farm, and KAS accepts its reality and the likelihood of its eventual expansion. Our participation in the joint comment with Friends of Wildlife and Wind Power and the Kittitas Field and Stream Club was deemed the best route available to strengthen the voice for protection of habitat and wildlife should approval be given to expand the wind farm.

Our purpose in writing this comment is to emphasize issues raised that are of particular concern to members of Audubon and of Kittitas Audubon Society in particular. A statement of our mission: “The mission of Kittitas Audubon Society is to develop an appreciation of nature and conservation with a focus on birds”. Since they are winged creatures and have come into the spotlight of late, we include bats.

For reasons not known, bats are particularly vulnerable to wind turbines judging from kills reported at a number of facilities. Recently reported was a high rate of bat kills at the Judith Gap wind farm in Montana - an estimated 1200 bats killed during an eleven month monitoring period – some 11.4 bats per turbine. The turbine specs are similar to those installed or are planned for installation at Wildhorse. Three fourths of the kills were migrating bats that hang out in trees to rest and nest, but Judith Gap is in a relatively treeless plains area, so the bats were apparently just passing through.

Better studies of greater length need to be performed for bat populations particularly in the more northerly part of the proposed expansion area where a forested landscape comes on the scene and where bats are more apt to be found.

Government officials, agency wildlife experts, industry, and private conservation people are cooperatively engaged in searching for answers to why the surprising and extraordinary level of kills. There are a number of hypotheses, but little or no research data of consequence to apply to the search for clues; emphasizing that so little scientific research on animal behavior has been done in this and in analogous situations. At least one individual studying the situation in the Columbia Gorge where wind turbines are rising in great numbers wonders what will happen to second-generation raptors; the parents having been in the area as the turbines came on scene. How will a chick fare on its first and subsequent flights? We are in a real sense performing experiments with minimal capacity to predict the outcome - one with potentially disastrous consequences. On-the-job training is OK in some instances, but not here.

There are reports of Greater Sage Grouse sightings in the project area, and that at least one nest has been found. Should ( We would like to feel comfortable saying “when”) the goals of habitat restoration be reached in the Project area and in the newly acquired lands between the Quilomene and Whiskey Dick Wildlife Areas, it is likely we will witness a gradual return to some of the historic occupants including the Greater Sage Grouse. A proposal to string an overhead transmission line to connect the easterly four turbines to the rest of the grid could be a bad move. There are reports that sage grouse exhibit avoidance of high structures including wires. But evidence supported by “best science” is lacking; so if the expansion is approved, along with approval should come an enforceable requirement that the operator assume obligation to take corrective action if such lines prove a wildlife hazard.

Shrub Steppe habitat at Wildhorse has been impacted in excess of earlier predictions, in one instance the result of excess heat generated from the initial-planned layout of the underground transmission cables that subsequently were distributed more widely

requiring more area. The excess width of new roads in general on the project are, as pointed out in the joint letter, much wider than people were led to expect thus chewing up more habitat.

Shrub Steppe is habitat that is disappearing most rapidly; a 1991- 1993 WA DFW study abstract states the loss of 50% from historic levels. Loss of habitat equates with loss of species that include Sage and Brewer Sparrows, and Loggerhead Shrikes. We've have more than 20 years with an increasing rate of conversion to add to the decline. These species, influenced by both soil and range type, should be beneficiaries of careful pre-installation studies as should other resident species.

The remoteness of the easterly four wind turbines poses big problems. Access for construction and maintenance require extensive road construction. The only current access is across public land and judging from the existing project significant impact will occur from road construction if transmission lines are placed underground. The proposal to connect with an overhead line has its problems; one of which is the potential for impacts on grouse, others are sight pollution and more roads for maintenance. There would be substantial reduction of impact associated with the proposed expansion if the four wind turbines were removed from the project; we ask serious consideration be given that remedy.

Landscape restoration appears to be lagging; successful seeding of native grass species hasn't been accomplished. Wildlife habitat restoration requires this be accomplished. If restoration is to be successful, there can't be a time-limit associated with it.

For the many good reasons listed in the joint letter to which KAS is a party, and for those stated herein, we urge a Supplemental Environmental Impact Statement be required as the best way to avoid unpleasant surprises, to address problems and ensure their resolution.

A handwritten signature in cursive script, appearing to read "Tom Gauron".

Tom Gauron President  
Kittitas Audubon Society  
P.O. Box 1443  
Ellensburg, WA 98926