



State of Washington
Department of Fish and Wildlife
201 North Pearl Street, Ellensburg, Washington 98926

April 30, 2004

Irina Makarow, Siting Manager
Energy Facility Site Evaluation Council
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RECEIVED

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**ENERGY FACILITY SITE
EVALUATION COUNCIL**

Subject: SEPA scoping comments – Wild Horse Wind Power Project

Dear Ms. Makarow:

The Department of Fish and Wildlife has reviewed the Application for Site Certification submitted by Wind Ridge Power Partners LLC and has discussed the project with the applicant on several occasions. The project area is primarily within native rangelands (shrub-steppe) which provides habitat for birds of prey, song birds, wintering deer and elk, etc.. Shrub steppe impacts are of particular concern because of the difficulty in restoration and time required to re-establish a mature shrub layer. Complete restoration of shrub steppe communities may require a protracted period of time that exceeds the life cycle of the wind farm. Lithosol communities (very shallow soils) are very fragile and restoration may be unsuccessful.

Shrub steppe is a State of Washington Priority Habitat because of the assemblage of wildlife dependent upon it. Any loss or fragmentation of shrub steppe is of concern. Many shrub steppe-associated wildlife species require large areas of land, and thus management of shrub steppe wildlife tends to focus on large tracts. However, smaller areas of shrub steppe are still important to song birds and mammals which depend upon native range lands.

This project site warrants special consideration for wildlife. The project lies within the largest remaining block of shrub steppe lands in Washington. Over the long term the ability to sustain the full array of shrub steppe species depends upon such large blocks of shrub steppe habitat. The project also lies with the state's Sage Grouse Recovery Area. Sage grouse are a state Threatened Species and have been proposed for listing under the federal Endangered Species Act. In addition, the project lies within an area designated by Washington Audubon as an "Important Bird Area". The Important Bird Areas program is Washington Audubon's effort to scientifically identify places in the state that are essential to maintaining healthy populations of birds.

The scope of the EIS should include analysis of:

1. **Direct Loss of Wildlife Habitat Due to Construction and Siting of Facilities.** The project will both temporarily and permanently affect native rangeland plant communities important to wildlife (i.e. shrub steppe communities including shallow soil communities and communities which because of fire or other past disturbances have a native herbaceous understory but minimal overstory of wood plants). Construction Impacts to wildlife habitat will include clearing, excavation, fill and grading associated with construction of towers, roads, utilities and substations. There will be temporary loss of habitat throughout the broad area required for construction activities, permanent loss of habitat from the footprint of the completed project and general reduction in habitat value of the site until disturbed areas are fully restored. How well construction is managed and the time of year (e.g. wet soils versus dry soils) have a direct relationship to the amount and degree of construction damage.
2. **Direct Loss of Wildlife from Project Operations.** The completed project will result in direct mortality of birds and bats striking turbines, meteorological towers, guy lines, and possibly new overhead transmission feeder lines. Tower lighting has the potential to exacerbate bird mortality.
3. **Indirect Impacts to Wildlife Habitat from Project Operations.** The operation of the project has the potential to adversely affect wildlife habitat through the spread of noxious weeds and increase risk of wildfire starts. The project road network may facilitate unrestricted off-road motor vehicle use, including ORVs use by the plant operators or the general public.
4. **Indirect Impacts to Wildlife from Project Operations.** There is potential for disturbance impacts to wintering deer and elk from facility maintenance, and from public motor vehicle access/use of the project road network.
5. **Mitigation Site Management.** Management of the mitigation site affects its value for fish and wildlife and should be considered in the EIS. The EIS should also consider the disposition of the site upon decommissioning of the project.
6. **Ability to Manage Deer and Elk, and Allow Public Hunting to Address Problem Animals.** WDFW is liable for damages caused by deer and elk. There is potential for deer and elk to use project lands as a refuge from which to foray out to adjacent agricultural lands and cause damage to crops and irrigated pasture. If public hunting is precluded as a means of dispersing animals or reducing herd size, WDFW's ability to manage animal depredation may be problematic.
7. **Cumulative Impacts to Wildlife and Wildlife Habitat.** Within the context of Kittitas County, the EIS should consider cumulative impacts associated with the permanent loss of wildlife habitat, and with the annual mortality of birds and bats striking project facilities. Particular note should be taken to potential impacts on birds and on recovery of sage grouse.

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The discussion of wildlife and wildlife habitat-related impacts in the application is extensive and mitigation measures proposed are responsive to our early discussions with the applicant. The EIS should incorporate this information and integrate it with other project information and concerns.

Please keep us apprised of the status of this application. If you have questions or need additional information, please contact me at the above address.

Sincerely

A handwritten signature in black ink, appearing to read 'B. Renfrow', with a long horizontal flourish extending to the right.

Brent D. Renfrow
District Habitat Biologist

Cc: Ted Clausing, WDFW Yakima
Lauri Vigue, WDFW Olympia