

From: [Susan Saul](#)
To: [EFSEC mi Comments](#)
Subject: Request for SCA Transfer and Permit Extension Request-Whistling Ridge Energy Project
Date: Tuesday, October 24, 2023 1:34:33 PM
Attachments: [Comments on Request to Transfer SCA and Extend Permit Deadline for Whistling Ridge Energy Project.docx](#)

External Email

Vancouver Audubon Society's comments are attached.

Susan Saul
Conservation Chair
conservation@vancouveraudubon.org





P.O. Box 1966
Vancouver, WA 98668-1966

October 23, 2023

Washington Energy Facility Site Evaluation Council
PO Box 43172
Olympia, WA 98503-3172

submitted via email to comments@efsec.wa.gov

RE: Comments on the Request for Transfer of the SCA and Permit Extension Request for the Whistling Ridge Energy Project

Dear Council:

The Vancouver Audubon Society has members in Skamania County where the proposed Whistling Ridge Energy Project would be located.

While we support the construction of renewable energy infrastructure to support Washington's Clean Energy Transformation Act and its commitment to an electricity supply free of greenhouse gasses by 2045, we are concerned about the request by Twin Creeks Timber to revive the proposal for the Whistling Ridge Energy Project more than one and a half years after the State of Washington's permit for this proposed project expired on March 5, 2022.

We have much better understanding of the impacts of siting wind facilities in relation to natural resource values and landscape connectivity than we did when Governor Christine Gregoire issued the permit for the proposed Whistling Ridge Energy Project in 2012. We now know that it is equally important to evaluate the landscape impact of an energy facility as well as its footprint when it comes to impacts to environmental values.

We are concerned that Whistling Ridge is a poor site location due to its potential impacts on birds. The project would have direct impacts by removing hundreds of acres of forest habitat, including on land within a Northern Spotted Owl Special Emphasis Area. The Washington Department of Fish and Wildlife is currently undertaking a periodic status review for the Northern Spotted Owl in Washington; we have supported maintaining the current listing of the species as endangered under state law. The prime reason for maintaining the current endangered status is the ongoing downward trend in the population over the past 30 years, making the population in Washington critically imperiled. The Whistling Ridge Energy Project would likely impede state efforts towards species recovery since habitat loss is one of the main reasons for its decline.

Furthermore, no studies have been done to determine how this project might impact other migratory birds and bats, including the direct impacts of the construction of facilities, such as turbines, fences, posts, transmission lines, and buildings. These facilities not only result in habitat loss and fragmentation, but they also alter competitor and predator-prey dynamics by attracting human-adapted species like ravens, crows, and rodents. These altered predator and competitor assemblages may outcompete or put increased predation pressure on native wildlife populations.

The number and location of turbines has direct implications for the level of severity of direct and indirect impacts on wildlife. This is especially true for impacts to wildlife habitat connectivity, bird mortality, loss of foraging habitat, and avian impacts overall. Due to the mobile nature of birds and other wildlife, impacts associated with the operation of wind facilities should be considered regional in scale rather than just site specific.

We do not know if and how the proposed Whistling Ridge Energy Project may impact bird and bat migration corridors, but any casual observer can see how eagles, hawks and vultures use the updrafts created by the physical nature of the Columbia River Gorge as travel ways during their daily activities, potentially carrying them into direct contact with wind turbines.

Given the high potential for impacts on birds and other wildlife, we oppose any efforts to revive the Whistling Ridge Energy Project.

Sincerely,

A handwritten signature in cursive script that reads "Susan M. Saul".

Susan Saul
Conservation Chair