Dear Planners, and Supervisors:

TerraGen's mitigation for killing murrelets is their "clean crumb campaign." However, the one local reference for the effectiveness of said mitigation was never cited.

"The Elk River Trail Corvid Survey," (attached) which has been conducted for 17 years along the Elk River Trail within the Headwaters Forest Reserve, has shown very inconsistent results with respect to ravens.

This supports the experience from the Kure/Stuyvesant mitigation, which reported: "Corvid Management for Marbled Murrelets provides no quantifiable data on the success or outcomes of their scavenger-proof trashcans, or public education efforts." (see my submission to the EIR)

Skookumchuck, the only other wind project in murrelet habitat, in Lewis Wa. includes habitat acquisition, rotor curtailment during murrelet breeding season, and removal of fishing gear.

TerraGen does none of these, relying solely on their clean crumb mitigation that is derived from un-empirical modeling, to protect an iconic species.

The Elk River Trail Corvid Survey results conflict and call into question the preposterous claims from TerraGen, ascribed to their hired murrelet biologist, Dr Golightly, that "this project is the best thing to happen to murrelets." In fact, it is the worst, and should trigger denial of the CUP, or recirculation of the EIR.

In addition, the following recent report supports the hydrometeorological and fragmenting effects so glibly dismissed in the EIR: "Wind energy production affects species and ecological systems in three ways. Collisions with wind turbines kill volant organisms, such as birds and bats, sometimes causing population-level consequences (*1*, *2*). Wind facilities and associated infrastructure transform the landscape, contributing to habitat loss, degradation, and fragmentation (*3*, *4*) and altering species behavior (*5*, *6*). Finally, wind turbines alter microscale and possibly macroscale weather" (*7*–*9*). 6 DECEMBER 2019 • VOL 366 ISSUE 6470 sciencemag.org **SCIENCE**

Respectfully,
Ken Miller 12/6/2019