

## Why Santa Barbara Audubon Cannot Support Strauss Wind

The Santa Barbara Audubon Society (SBAS) cannot support the Strauss Wind Energy Project (SWEP) as it is currently designed. **SWEP will cause a level of harm to birds (especially raptors) and their habitat that we find unacceptable, and which the County has determined constitute “Class I” (“significant and unavoidable”) impacts** under the California Environmental Quality Act (CEQA). We have come to this conclusion reluctantly, and only after careful review of the 4,260-page Final Supplemental Environmental Impact Report (FSEIR) recently released by the County, and following 1½ years of written and face-to-face communications and meetings with County planning staff and the project developer, BayWa.

We recognize and wholeheartedly support the County’s (and the planet’s) need for renewable energy, including wind energy. But such projects must be environmentally responsible and appropriately sited, as has been achieved in many wind energy projects across the country. We believe SWEP falls short on these counts.

**The FSEIR acknowledges that SWEP would result in “significant and unavoidable” harm to birds and woodland/tanoak forest**, including Class I visual impacts and inconsistencies with County Plans, Policies, and Development Standards resulting from the removal of hundreds of protected specimen oaks. We have offered numerous recommendations for a more bird- and habitat-friendly project design that could have substantially mitigated such effects. However, these have not been seriously considered or incorporated into SWEP, and Class I impacts remain, including those identified in the FSEIR as BIO-10—Avian and Bat Collisions with WTGs, and BIO-2a—Construction Impacts to Woodland and Forest.

Some additional context to our concerns about SWEP:

- The developer’s own recently collected survey data, as presented in the FSEIR, indicate very high raptor use across the SWEP site. For example, extrapolating the average hourly raptor observation data results in an estimated 8,208 total raptor observations per year across the project site, including 1,467 Golden Eagle and 5,818 Red-tailed Hawk observations. These new data further show that raptors were observed in the project’s rotor-swept zone 15% of the time. Collectively, these data confirm the likelihood of the project resulting in very high raptor mortality. **One project-knowledgeable expert stated that SWEP would likely cause at least four pairs of nesting Golden Eagles (a State and Federal fully protected species) to be extirpated from the Lompoc area.**
- U.S. Fish and Wildlife Service Migratory Bird Division staff recently stated that SWEP may prove to be (pending a forthcoming Collision Risk Analysis) a “Category 1” site under its Eagle Conservation Plan (ECP) guidance, which would require the Service to **recommend that the project be built in another location with less eagle use.**
- A single Golden Eagle death due to collision with a wind turbine generator (WTG)—a virtual certainty given the bird survey data presented in the FSEIR—would constitute a violation of California law (which allows no “take” of this species) and thereby risks penalties or curtailment of project operations by the State. The FSEIR offers no information on how the County would handle such a situation.

- Because of its effects on 15 species of migratory raptors, SWEP undermines the good decisions of land managers elsewhere to protect their nesting raptors that then migrate along this flyway and would be endangered by SWEP's WTGs.
- SWEP does not comply with either California or Federal wind energy guidelines regarding the appropriate use of bird survey data to inform the placement of WTGs so as to minimize risk to birds.
- **SWEP will destroy over 600 mature coast live oak and tanoak trees, causing damage to this fragile woodland that would outlast the life of the project.** The FSEIR concludes: "...woodland and forest habitats can take decades or more to regain the lost habitat values. The Project would result in a substantial contribution to the loss of woodland and forest within the Lompoc Valley." Even the project's "Environmentally Superior Alternative" would result in the loss of some 225 mature oaks.
- SWEP would be the first (and only) wind energy project in California requiring the destruction of a woodland ecosystem.

From a broader perspective, it should be understood that SWEP would place 30 492-foot-tall WTGs across 5,887 acres of rural/agricultural and riparian woodland in the heart of the quiet and beautiful San Miguelito Canyon bordering the Gaviota Coast, including the recently protected 24,000-acre Dangermond Preserve—and directly in the path of the 15 raptor species known to use this coastal migration route. It would require road widening that would permanently alter the exquisite oak riparian landscape along significant sections of San Miguelito Road.

A project of this scope and magnitude does not belong in such a setting. Based on the County's own analysis, it will cause significant and irreparable harm to birds and wildlife, landscape, and woodlands—all for a very small return (less than 4% of the County's Strategic Energy Plan goals). These goals could be achieved in other, less bird- and habitat-destructive ways (such as solar photovoltaic technology, offshore wind farms, stronger vehicle emission standards, and improved private and commercial energy conservation measures).

Moreover, based on written and verbal public comments to date, the people most immediately affected by the project (local residents and business owners, users of onsite and nearby recreational and nature-oriented activities) do not want it, citing the attendant noise, negative aesthetics, increased fire hazard, harm to tourism, and reductions in property values, in addition to bird/wildlife and environmental damage.

For all the above reasons, and consistent with our core mission of protecting birds and their habitat—which also serves to “umbrella” the other wildlife in this unique area—SBAS cannot support SWEP as currently designed.