

To: PA Audubon Council

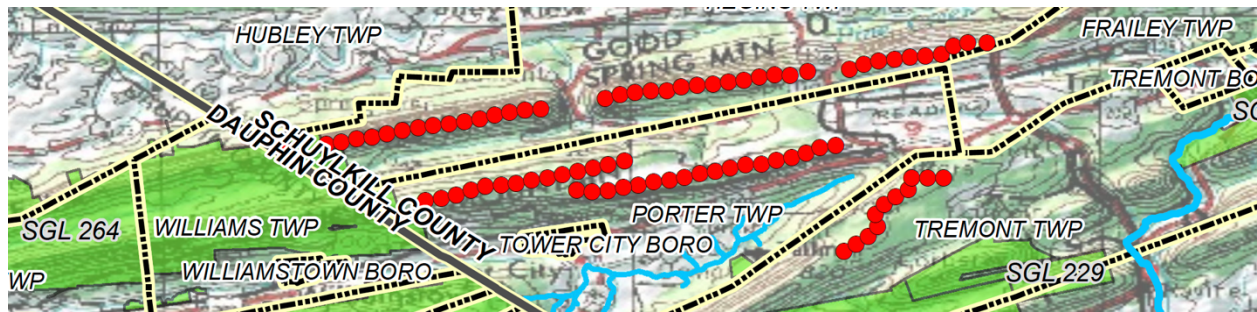
Re: Conservation Issue: The Proposed Anthracite Wind Project in Schuylkill County, Pa.

From: Laura Jackson, Vice-President and Conservation Chair, Juniata Valley Audubon Society

Date: 11/7/21

### **Background:**

The Anthracite Wind project is proposed for three ridges in western Schuylkill County, north of Tower City in four townships: Hegins, Frailey, Porter, and Tremont. The developer (Clean Air Generation, LLC) plans to construct 83 turbines (red dots on map), up to 499 feet tall, as shown in the map below.



Our current concern is potential ecological impacts in Hegins Township, which will host 24 wind turbines, if approved, on Bear and Good Spring Mountains (the top string of turbines on the map). The remainder of the project falls under Schuylkill County zoning, and will be addressed at the county level at a later date.

The Zoning Hearing Board in Hegins Township is currently holding hearings regarding the wind project application. A number of citizens oppose the project, as do the following: Hawk Mountain Sanctuary, American Bird Conservancy, Fort Indiantown Gap National Guard Training Center, Save Our Allegheny Ridges, Juniata Valley Audubon Society, and the Schuylkill County Airport.

There are no Audubon chapters that cover this area in Schuylkill County, but Juniata Valley Audubon Society is involved, since we have experience with industrial wind turbine concerns in other areas of the state. The chapter opposes industrial wind turbine projects on forested ridges in Pennsylvania due to their extensive negative ecological impacts.

A joint comment letter on the proposed Anthracite Ridge Wind project is in draft form and should be finalized soon by American Bird Conservancy and Hawk Mountain Sanctuary. The goal is to send the letter to the Hegins Township Zoning Hearing Board, as well as other involved parties, before the next hearing, which is scheduled for November 23, 2021.

### **Summary of Draft Comment Letter**

We submit these comments to express our concern over ecological impacts if the Anthracite Ridge Wind project is approved by the Hegins Township Zoning Hearing Board.

We support responsibly sited industrial wind projects as part of a broader strategy to combat climate change, but wind projects need to be sited in a location where impacts to wildlife are minimized.

The proposed location of the Anthracite Ridge Wind project has high biodiversity value, so the construction and operation of an industrial wind facility at the site poses significant risks of negative impacts to protected species and other species of conservation concern. It appears that the applicant has not completed field studies to evaluate these likely environmental impacts, and that these studies may show that it is not possible to reduce these impacts to an acceptable level, given the sensitive nature of the habitat and the protected species found there.

The proposed location of the Anthracite Wind project is near the Kittatinny Ridge, a designated Conservation Landscape by Pennsylvania Department of Conservation & Natural Resources, and a Global Important Bird Area by National Audubon Society.

In addition, the following addresses potential negative impacts to a variety of sensitive species, if turbines are sited in Hegins Township:

1. Wind turbines on Bear Mountain would fragment forested habitat, resulting in barriers to genetic dispersal of the state-threatened Allegheny woodrat known to exist in the Bear Mountain Natural Heritage Area.
2. A search using the Pennsylvania Wildlife Action Plan Conservation Opportunity Area Tool shows that 16 Pennsylvania Species of Greatest Conservation Need are found in the proposed wind turbine site. Avian species likely impacted would be the Cerulean Warbler, Scarlet Tanager, Eastern Whip-poor-will, and Wood Thrush – to name a few. Six species are so sensitive that they are not identified in this publicly accessible reporting tool.
3. Information provided by the U.S. Fish and Wildlife Service (USFWS) indicates that the proposed wind project is within the range of the Federally Endangered Indiana bat and the Federally Threatened northern long-eared bat. The USFWS noted that insufficient information was provided by the applicant, since there are 151 abandoned mine portals in the project area, but only 43 were surveyed.
4. Both Bald and Golden Eagles are protected under the Federal Bald and Golden Eagle Protection Act, which makes it illegal to kill an individual of either species, regardless of whether this is intentional or unintentional. Golden Eagles use the area during fall and spring migration and some overwinter on the forested mountains in the project area. They are especially vulnerable to wind turbine mortality when hunting in the winter. Bald eagles have also been documented in the project area.

Although the project application states that surveys for sensitive species are being conducted, there is little detailed information provided and the timing and methodologies are vague. Impacts to wetlands and other sensitive habitats are also lacking, as well as information on impacts to stream water quality.

We urge you to deny the Anthracite Ridge Wind project application, based on the incomplete studies that have been submitted to the township.