

NOTES | 11/22/2013 Conference Call

Altamont Pass Wind Resource Area Scientific Review Committee

Prepared by the Center for Collaborative Policy

Reviewed and approved by the SRC

All 5 SRC Members Present

Discussion Topics

- Sand Hill Repowering DEIR
- Updates on Repowering and Monitoring Program
- Next In-person Meeting

Next In-Person Meeting

Date: February 13, 2014 [Date updated since call]

Action Items

Party	Due Date	Action
SRC	February 13, 2014	Next in-person meeting
SRC	COB Dec. 18, 2013	Send final individual comments on DEIR to CCP for incorporation in final version of P279 SRC comments document
CCP	COB Dec. 23, 2013	Integrate SRC consensus comments & updated individual comments into P279 SRC comments document on DEIR
SRC & Public	Feb 1, 2014	Send ideas for potential 2014-15 Monitoring Program special studies to Monitoring Team

Sand Hill Repowering Phase 1 Draft Environmental Impact Report

Related Documents

[P275 Sand Hill Wind Notice of Availability of Draft Environmental Impact Report](#)

[P276 Sand Hill Wind Draft Environmental Impact Report](#)

[P277 Alameda County Memo SRC Guidance on Sand Hill DEIR 2013](#)

[P278 Smallwood First Annual Report of Turbine Experiment Forebay](#)

[P279 SRC Comments on Sand Hill DEIR](#)

Introduction

Alameda County’s consultant, ICF, developed a Draft Environmental Impact Report (DEIR) to analyze potential environmental impacts of the Sand Hill repowering project proposed by FloDesign. The objective of the agenda item was to obtain SRC feedback and consensus comments on whether the DEIR’s methods, assumptions, and proposed mitigation measures are appropriate and effective for evaluating the operational impacts of the proposed project as they relate to avian biology.

Background

Susan Swift and Brad Schafer of ICF provided an overview of the CEQA process for evaluating the proposed project and discussed the conclusions of the DEIR. The proposed project has two phases. The initial repowering (Phase 1) proposes replacing 73 turbines with 40 newly-developed shrouded turbines and supporting an ongoing 3-year avian validation study. The primary goal of the avian study is to determine the impact of the new shrouded turbine design on avian and bat species. Depending on the results of the avian study, the full repowering (Phase 2) may replace approximately 400 turbines by 340 shrouded turbines overall. The DEIR provides a project-level evaluation of Phase 1; Phase 2 is evaluated at the programmatic level, because Sand Hill will not submit a Phase 2 application until more data are gathered from the avian study. An additional environmental analysis will be undertaken at that time.

ICF evaluated five alternatives including a No Project alternative, compared the alternatives to two baselines (for Phases 1 & 2), selected the environmentally superior alternative, and described potential mitigation measures. ICF used a conservative approach to compare the shrouded turbines to existing turbines and determined the new turbines would have a similar or reduced impact on avian and bat species. The proposed project, alternatives, baseline selection and fatality rate calculations, and mitigation measures are described in further detail in the DEIR.

SRC Questions

ICF, County Staff, and the Sand Hill project representatives provided the following responses to SRC questions:

- The full repower phase may or may not require a completely new EIR in the future. The Phase 2 application will undergo CEQA initial review, and depending partly on the avian validation study information, the County will determine whether a full EIR is required.
- In response to a question about where monitoring information is, ICF representatives said the Mitigation, Monitoring and Reporting Program will be available with the final EIR and open for comment for at least ten days. The mitigation measures do not change from the DEIR, but the Program specifics are subject to change. The primary distinction from the mitigation measures in the DEIR is the Program adds a column identifying the responsible parties for monitoring.
- The DEIR has several figures indicating proposed shrouded turbine locations for Phase 1. 150 existing turbines were selected for comparison – based on megawatts, half of the turbines will remain as controls, while the others will be replaced by shrouded turbines.
- The final shrouded turbine density will be lower than current turbine density, but FloDesign does not have the precise estimate. The final density will also decrease when the 340 shrouded turbines are dispersed over a larger area, because a land parcel with currently no turbines will be added to the project area.
- FloDesign has not estimated the total turbine rotor swept area across the entire project. It has estimates on individual turbine models, but no analysis has compared the total rotor swept area of existing turbines to the shrouded turbines.
- Some SRC members asked what the rationale was for selecting 10 turbines for Alternative 1. ICF representatives said FloDesign study scientist Shawn Smallwood

suggested that number to the SRC in his initial study plan. However, the SRC had said the sample size was too low to observe a statistically significant effect.

- CEQA requires the County to select an environmentally superior alternative that is not the proposed project. The intention is to ensure the County reviewed the alternatives.
- The significance of impacts were evaluated based on the baseline fatality rates identified by Smallwood, with the exception of golden eagle, for which a different baseline was assumed because no eagle fatalities were identified during the first year of the study. The environmentally superior alternative was determined by comparing the estimated total fatalities of focal species across the various alternatives, relative to the No Project alternative, without allowing either the No Project or the Proposed Project to be selected .

SRC Discussion

SRC comments submitted prior to the meeting emphasized the need for more information in the DEIR. For instance, the DEIR does not adequately review the negative impacts of lacking a statistically significant avian validation study for Alternative 1; assessments did not consider bird use to evaluate repowered turbine impacts; and the full repowering turbine density was unclear.

Two SRC members said the DEIR needed more details on implementing mitigation to determine whether mitigation was adequately addressed.

One SRC member had several concerns and questions regarding the Avian Validation Study, specifically on the methodology and how the data will be used. However, detailed information on the avian study is not included because this is beyond the scope of the DEIR. The final EIR would include the results of the avian study.

One SRC member said the DEIR's 10-turbine sample size for Alternative 1 seemed arbitrary. Future project proposals might follow this precedent with arbitrary alternatives or proposed projects with extreme numbers without further explanation or rationale.

An SRC member said the overall DEIR alternative analyses seemed reasonable with standard assumptions and methods. Additional clarification on certain issues such as turbine density is beneficial though.

Several SRC members said the methodology did not clearly explain assumptions or provide a flow of reasoning for reaching conclusions (e.g., Table 4-1 comparing the alternatives' impacts to the proposed project and 3 MW less repowered (and therefore possibly unremoved) turbines unaccounted for after repowering based on Alternative 1; pages 4.2-4.3 regarding baseline used for estimating fatality rates).

Two SRC members suggested the DEIR exclude the seasonal shutdown from potential mitigation measures because studies suggest the shutdown may negatively affect burrowing owls. Several SRC members agreed they do not want to set a precedent for automatically implementing mitigation strategies without scientific justification.

One SRC member suggested further evaluation for the rotor swept area as a mitigation measure since that area is much smaller than the area of influence of repowered turbines.

An SRC member suggested future studies compare the shrouded turbines to other repowered turbines rather than old generation turbines.

Public Comment

There were no comments from the public.

SRC Consensus on Comments to Submit on the Sand Hill Repowering Phase 1 Draft EIR

1. The DEIR should add further rationale for the alternatives. Specifically note that the SRC had originally recommended a statistically informative sample size for the study and not the 10 turbine alternative used by the consultants for the DEIR.
2. Various assumptions and rationale warrant further explanation.

Upcoming Timeline for the Sand Hill Phase 1 DEIR

- A public meeting will be on December 19 at 1:30pm at the Pleasanton Council Chambers.
- Public comment for the DEIR Phase 1 ends 5:00pm December 23, 2013.
- The Final EIR will be available for at least 10 days for public comment in early spring of 2014.
- The East County Zoning Adjustments board review decision is tentatively scheduled for March 27, 2014.

Next Steps

- SRC member Jim Estep will send Facilitator Ariel Ambruster his individual comments to incorporate into the P279 SRC Comments document. Other SRC members who would like to change or add individual comments may do so.
- Facilitator Ariel Ambruster will pull out specific suggestions for areas needing further explanation from the SRC written comments to include in the SRC consensus comments.
- SRC members and members of the public can submit additional DEIR comments as an individual to Alameda County by December 23.

Updates on Repowering and Monitoring Program

Sandra Rivera of Alameda County provided updates on upcoming repowering projects and the financial status of the Monitoring Program. Repowering projects moving forward include Sand Hill (by FloDesign), Patterson Pass (by EDF/enXco, Inc.), and Golden Hill (by NextEra). The Board of Supervisors favors reducing the Monitoring Program by approximately 50% for the 2014-15 Bird Year, for a budget of about \$294,000. The Monitoring Team has determined that the reduced funding level could not support monitoring enough turbines to effectively provide useful information for repowering projects.

Sandra Rivera of Alameda County requested SRC members and the public to begin identifying what issues the Monitoring Team could focus on for the 2014-15 year, given their financial constraints. Monitoring Team Project Manager Doug Leslie suggested a study of background fatality rates of burrowing owls and American kestrels so we can accurately estimate turbine-related fatality rates at repowered turbines.

Other proposed studies included:

- Bat distribution and abundance (Monitoring Team).
- Detection probability and adjustment factors for bat fatalities (Brian Karas).
- Expanding efforts to estimate detection probability using the integrated trials being conducted by Smallwood (Shawn Smallwood).
- Burrowing owl behavioral study (Sue Orloff).

Public Comment

Shawn Smallwood provided a brief update on a portion of his research on burrowing owl behavior. This was to provide context for SRC members on what recent research has been completed. He has been using a thermal camera to observe burrowing owl nocturnal behavior. He observed predation attempts on burrowing owls, but predators were not using non-operating turbines as perches. He also observed burrowing owls engaging in risky behavior such as hovering very close to operational turbines. He will provide additional information at the next in-person meeting in February.

Next Steps:

- SRC members and the public are invited to e-mail the Monitoring Team comments and suggestions on focused studies for the 2014-15 Bird Year Monitoring Program.

Wrap Up and Next Steps

Next In-person Meeting: February 13, 2014

Tentative Topics:

- SRC input on draft repowering EIR/Avian Protection Plan [Now tentatively scheduled for a mid-2014 meeting]
- Review draft 2005-2012 Monitoring Report
- SRC consideration of objectives and priorities for 2014-15 Monitoring Program year
- Updates from Shawn Smallwood on insights from recent research
- Update from Brian Karas on CalWEA report.

ATTENDEES

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