



16 November 2021

Hegins Township Zoning Hearing Board / Hegins Township Supervisors
Linus Fenicle, Hegins Zoning Hearing Board Solicitor
Hegins Township Municipal Building
421 S. Gap Street
Valley View, PA 17983

Re: Comments on Anthracite Ridge, LLC / Clean Air Generation, LLC Wind Energy Project

Dear Mr. Fenicle,

On behalf of Hawk Mountain Sanctuary Association, Orwigsburg, PA, we submit these comments to express our concerns about Anthracite Ridge Wind proposal.

We fully support environmentally responsible wind and other renewable energy development as an important component of a strategy to combat climate change. Environmentally responsible wind energy development starts with siting turbines where impacts to wildlife can be effectively minimized. Based on available information and our extensive expertise, we have evaluated the Anthracite Ridge Wind project proposal and find it does not meet these criteria.

The proposed location of the Anthracite Ridge Wind project has high biodiversity value and lies atop ridges of the Ridge and Valley area of Pennsylvania where the development and operation of a wind facility poses significant risks to migratory raptors, songbirds, and PA species of conservation priority. Golden Eagles, a species of Greatest Conservation Need in Pennsylvania, migrate along Appalachian ridges and winter nearby and would be of particular risk by this project if it is completed.

Any further consideration of this project should be suspended until the applicant conducts additional field studies to evaluate environmental impacts on a host of species that use the region for breeding, migration, and year-round habitat use.

Specifically, we recommend that the Township require the applicant to:

- Conduct two years of winter eagle surveys at the project site, following protocols provided by the U.S. Fish and Wildlife Service;
- Conduct two years of full-season fall and spring eagle / raptor and songbird migration surveys at the project site, using trained observers and state-approved protocols, and make the data from these studies available for public review, to ensure the impacts on migratory birds is understood before permits are approved,
- Confirm with all relevant Federal and State natural resource management agencies that surveys conducted for all other species groups of concern are adequate in both timing and extent, and that likely impacts on bats and nesting raptors are effectively avoided and/or mitigated.

The proposed location of the Anthracite Ridge Wind project is just north of the Kittatinny Ridge, the biodiversity value of which is well-established. Kittatinny Ridge is designated a Conservation Landscape by Pennsylvania Department of Conservation & Natural Resources, and a Global Important Bird Area by National Audubon Society, among other distinctions. The ridge hosts tens of thousands of hawks, eagles, and other raptors during migration each year, as documented at Hawk Mountain Sanctuary and several other nearby raptor count sites within the Hawk Migration Association of North America network (hawkcount.org).

Ridges parallel to the Kittatinny/Blue Mountain also host migrating raptors, including regionally large numbers of Golden Eagles, with some showing higher numbers than are seen along the Kittatinny Ridge.

The Appalachians serve as a key corridor for migrating songbirds. Hawk Mountain records more than 30,000 songbirds on average each fall flying along the Kittatinny Ridge. Records from birdwatchers on other Appalachian ridges suggests the ridges near the project site also host substantial numbers of migrating songbirds.

Eagles at Risk

As discussed in the preceding section, the proposed location of the Anthracite Ridge Wind project is within an area of enormous importance for Bald and Golden Eagles and other raptors. The proposed project location is 35 miles northeast of a site that records more than 200 migrating Golden Eagles each fall and greater than 20,000 migrating raptors. Moreover, a multi-ridge study in the 1990s, showed significant numbers of eagles migrating along the Tuscarora Mountain, a ridge that lies due west of the Susquehanna River and across the river from the two ridges where this project is proposed. Satellite tracking data for ~100 Golden Eagles (approximately 2% of the eastern population) indicates that the proposed project site is used by this species in spring migration, winter, and fall.¹ Bald Eagles have also been documented using the project area regularly and are seen wintering nearby.

Pennsylvania is a disproportionately important place for Golden Eagle conservation. The small eastern population, e.g., 5,000 birds, has been shown to winter and migrate through Pennsylvania in higher numbers than any other region. Because of the importance of Pennsylvania to Golden Eagles, they were designated a *Species of Greatest Conservation Need* by the PA Game Commission in 2015.

The harmful impacts of wind turbines on Golden Eagles are well-documented. A recent study found that Golden Eagles are at risk of **population-level declines** because of wind energy development. Ridgetops are an important component of habitat for these birds throughout the year, and in winter hillsides and cliffs are important as well, thus wind development in these habitats is a particular threat.

Both eagle species are protected under the Federal Bald and Golden Eagle Protection Act, which makes killing an individual of either species illegal, regardless of whether this is intentional or unintentional.

Risks to other Birds

The Pennsylvania Wildlife Action Plan Conservation Opportunity Area Tool indicates that several State of North America's Birds Watch List species also are found within the proposed project site, including Cerulean Warbler, Eastern Whip-poor-will, and Wood Thrush. Other raptors listed as Species Greatest of Conservation Need may also use the site as a migration corridor, including Northern Goshawk and

Sharp-shinned Hawk. The Northern Goshawk is listed as a State Endangered species. Because the Appalachians are a major corridor for migrating songbirds as well as raptors, we assume that many other songbirds also follow these ridges in fall migration including swifts, swallows, tanagers, warblers, and others.

We urge the Township to confirm with all relevant agencies, including PA Department of Conservation & Natural Resources, PA Game Commission, PA Fish & Boat Commission, and US Fish and Wildlife Service, that all necessary surveys have been conducted, that they are adequate in time and scope, and sufficiently recent to provide reliable data.

In summary, Hawk Mountain is deeply concerned about the likely impacts of the proposed facility on migrating eagles, other raptors, songbirds and bats. As such, we ask Hegin Township to deny any permit until which time adequate surveys are completed and demonstrate a negligible impact on wildlife.

Sincerely,



Sean Grace
President
Hawk Mountain Sanctuary Association
Kempton and Orwigsburg, PA
grace@hawkmountain.org; 610-756-6961

Cc: Susan Smith, Schuylkill County Director of Planning and Zoning
Gary Bender, Schuylkill County Administrator
Bruce Anders
Martin Cerullo
Donald Karpowich
Jeffrey Wallitsch