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COUNTY OF SOLANO
RESOURCE MANAGEMENT

June 1, 2012

Mr. Harry Englebright, Planning Services Division
Solano County
Resource Management Department
675 Texas Street, Suite 5500
Fairfield, CA 94533
henglebright@solanocounty.com
707-784-4805 fax

**Re: Draft Initial Study and Negative Declaration regarding Proposed
2012 Amendment to the Solano County Component of the Suisun
Marsh Local Protection Program**

Dear Mr. Englebright:

Audubon California is the state program of The National Audubon Society.

The Napa-Solano Audubon Society is Chapter C-28 of the National Audubon Society, covering all of Napa and Solano Counties, located north and northeast of San Francisco Bay.

On behalf of Audubon California's 150,000 members and supporters and Napa/Solano Audubon Society's 500 members and supporters we thank you for the opportunity to submit our joint comments on the Draft Initial Study and Negative Declaration regarding Proposed 2012 Amendment to the Solano County Component of the Suisun Marsh Local Protection Program.

National Audubon Society has recognized Suisun Marsh as a globally significant *Important Bird Area*. The Important Bird Areas Program, administered by the National Audubon Society in the United States, is part of an international effort to designate and support conservation efforts at

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sites that provide significant breeding, wintering, or migratory habitats for specific species or concentrations of birds. Sites are designated based on specific and standardized criteria and supporting data.

Suisun Marsh is the largest contiguous brackish water marsh remaining on the west coast of North America. Along with the Concord Marshes on the south side of Suisun Bay, Suisun Marsh ecologically links the Central Valley/Delta Area with the Pacific Coast.

An endemic race of Song Sparrow, Suisun Song Sparrow, has essentially its entire global population (c. 20-50,000 individuals) within the IBA, and it is believed to be the only area in the world where the Saltmarsh Common Yellowthroat, another Bay-Area endemic, is common (Nur et al. 1997). Suisun Bay is one of the few areas of California that supports more than 100,000 waterfowl during the winter, particularly dabbling ducks (Green-winged Teal, Mallard, Northern Pintail, Northern Shoveler and American Wigeon). Suisun is one of just three wintering areas for the rare Tule race of the Greater White-fronted Goose (Small 1994). With its mix of freshwater and tidal marsh, nearly every wetland bird species in the region occurs here. The number of California Black Rails here and in the adjacent Carquinez Straits rivals that of San Pablo Bay just to the west, which holds about half the global population of the taxon (Evens and Nur, in press). Unlike coastal wetlands, a few California Clapper Rails have been noted in the IBA, associated with tidal sloughs. Short-eared Owl winters in large numbers and many still breed, the only regular nesting locale along the coast of California. The diked wetlands support breeding colonies of Tricolored Blackbird, American White Pelican have recently begun summering in large numbers and may conceivably begin to breed. The hundreds of Great Egret breeding at Suisun represent an estimated 35% of the San Francisco Bay Area population (Kelly et al. 1993). As the upland areas surrounding Suisun Marsh become increasingly developed, their conservation will be of greater importance in the region for raptors (nesting Golden Eagle) and open-country species like Loggerhead Shrike. Yellow Rail, essentially extirpated in the state, was detected in February of 2002 (two birds), and may prove to be regular in winter (RL). Sand cells in the project have attracted nesting Least Tern (25 nests) and Snowy Plover (5 nests) to the Montezuma Wetland Restoration

Audubon California and Napa/Solano Audubon are firmly committed to fighting global warming. In recognition of the growing threats to human and

ecological communities presented by the unabated release of greenhouse gases we have championed the aggressive development of both energy conservation and renewable energy generation. In locations throughout our state Audubon at the state level and our chapters at a local level have successfully collaborated on the development of renewable energy facilities—striking a balance between landscape conservation priorities and renewable energy.

However, we are highly concerned about the proposed changes to the wind energy policy in the County's draft LPP component that would allow wind development in the secondary management area of the Marsh, and we are very concerned that the County has determined that allowing wind development in the Marsh would not have significant environmental impacts. We disagree.

We participated as stakeholders in the both The California Guidelines for Reducing Impacts to Bird and Bats from Wind Energy Development adopted by the California Energy Commission in 2007, and the U.S. Fish & Wildlife Service voluntary Land-based Wind Energy Guidelines.

Both of these documents state clearly that wind project sites with high or uncertain potential for wildlife impacts include the following:

- Known avian migration stopover destinations such as water bodies within or immediately adjacent to the project;
- Special-status species occurring on or adjacent to a proposed site;
- High concentrations of wintering and/or breeding raptors; and
- Sites near or contiguous to wind projects that have experienced high bird or bat fatalities that cannot be avoided or minimized.

The Marsh clearly meets all four of these criteria.

We concur with the State of California Department of Fish & Game's objection to wind development in the Marsh in a letter to the County because it "could alter the use and migration patterns of both migratory and resident bird species and bats," and support the conclusion of the state Natural Resources Agency with the Governor's support opposing wind development in the Marsh.

For these reasons, we do not support the adoption of a negative declaration for the County's proposed revisions to the wind energy development policy of the LPP, and ask you to reconsider your draft Local Protection Program amendment and your mitigated negative declaration.

Sincerely,

A handwritten signature in cursive script, appearing to read "Garry George", followed by a horizontal line extending to the right.

Garry George
Renewable Energy Project Director
AUDUBON CALIFORNIA
4700 North Griffin Ave. □
Los Angeles, CA 90031
323-933-6660 p
ggeorge@audubon.org

Gerald D. Karr
Conservation Chair
Napa/Solano Audubon Society
PO Box 1006
Napa, CA 94581
birdnerd@comcast.net

GG: sc