



Shaping the future for birds

April 23, 2014

The Honorable Sally Jewell
Secretary
U.S. Department of the Interior
Washington, D.C. 20240

Dear Secretary Jewell:

On behalf of the undersigned conservation organizations, we ask the U.S. Department of the Interior to develop a Programmatic Wind Environmental Impact Statement to identify appropriate areas for wind energy development as well as areas where new projects should be avoided to conserve wildlife and sensitive habitats. A national, Wind Energy EIS is entirely consistent with your recently-released strategy for improving landscape level planning and mitigation for future development on public lands (*Improving Mitigation Policies and Practices of the Department of Interior*). Wind energy, and indeed all forms of energy development have the potential to cause significant harm to wildlife if improperly sited and managed.

Recent peer-reviewed articles have documented significant losses of birds and bats, including threatened, endangered and other protected species (an estimated 573,000 birds and 888,000 bats annually at 2012 build-out levels). The number of birds taken annually by wind energy facilities could exceed 1.4 million by 2030 if there is no change in US policy towards wind energy development. There are also significant habitat impacts to Endangered Species Act candidate species such as the Greater Sage-Grouse. Combined with other major human impacts on bird populations, including feral cats, pesticides and collisions, this could continue the downward trend we are currently seeing in even our most common species.

The undersigned groups are supportive of renewable energy as a way to address anthropogenic climate change, but only if it addresses wildlife and habitat impacts. In particular, this means appropriate pre-construction assessments of risk leading to proper siting, post-construction mitigation and independent monitoring of fatalities, and compensation if and when public trust resources are being taken. Effective risk

assessment also means being aware of the cumulative impact of other sources of fatalities besides wind, both natural and unnatural.

When it comes to wind energy, siting is everything. Indeed, we believe that much of this conflict could be averted by a National Wind Energy Environmental Impact Statement (EIS), which would determine where wind energy should be developed and where it should not.

Siting wind energy turbines in major bird migration routes, in or near critical breeding habitat, and in or near other sensitive areas, such as wetlands, wildlife refuges and parks, and priority Greater Sage-Grouse habitat poses far too great a risk to our public trust resources, including birds and bats. ABC and other organizations have created maps to help guide [wind energy siting decisions](#). Newly developed information from USGS could also be incorporated into the [planning process](#).

There is precedence for such an EIS. Recently we met with representatives of the Bureau of Land Management (BLM), who have conducted just such a planning effort for solar energy on public lands in the West, identifying areas where solar energy can be developed versus where it should not. They are further considering how to factor in cumulative impacts from other development (e.g., oil and gas) into their decision making processes. Depending on how effectively this process is implemented, it could potentially provide a model for wind energy development as well.

We would welcome an opportunity to meet with you, BLM Director Neil Kornze, and FWS Director Dan Ashe to discuss these issues in more detail. Thank you for your consideration.

Sincerely,

American Bird Conservancy
Cornell Laboratory of Ornithology
Endangered Species Coalition
The Trust for Public Land
Wild Birds Unlimited
Wildearth Guardians

Alabama Ornithological Society Conservation Committee
Alliance for the Wild Rockies
American Eagle Foundation
Atlantic Audubon Society
Audubon Society of Greater Denver
Audubon Society of New Hampshire
Audubon Society of the Everglades
Braddock Bay Raptor Research

Brighton Ridge Protectors
Californians for Western Wilderness
Cumberland-Harpeth Audubon Society
Delaware Valley Raptor Center
Delmarva Ornithological Society
Educational Birds of Prey
Erie Shores Birding Association
Endangered Habitats League
Epic-Environmental Protection Information Center
Evanston North Shore Bird Club
Flathead Audubon Society
Friends of Dyke Marsh
Friends of the Tampa Bay National Wildlife Refuges
Golden Eagle Audubon Society
Golden Gate Audubon Society
Gulf Coast Bird Observatory
Halifax River Audubon
Hawk Migration Association of North America
Institute for Environmental Learning, Inc
Illinois Ornithological Society
Kansas Wildlife Federation
Klamath Forest Alliance
Lake Erie Group, Pennsylvania Chapter, Sierra Club
The Lands Council
Lane County Audubon Society
Law Office of David H. Becker, LLC
Los Padres ForestWatch
Madrone Audubon Society
Maryland Ornithological Society
Monterey Audubon Society
Montgomery Bird Club
New York City Audubon
Northcoast Environmental Center
Northwest Center for Alternatives to Pesticides
Operation Migration
Orleans Audubon Society
Otter Creek Audubon Society
Raptor Education Group, Inc.
Robert Cooper Audubon Society
Salem Audubon Society
Santa Barbara Audubon Society
Save Our Allegheny Ridges
Save Our Senecas
Saving Birds Thru Habitat

South Florida Audubon Society
Southeastern Arizona Bird Observatory
Southern Maryland Audubon Society
Southwestern New Mexico Audubon
St. Louis Audubon Society
Sycamore Audubon Society
Tennessee Ornithological Society
TLC Birding Tours
Warioto Audubon
Western Nebraska Resources Council
Wild Utah Project
Wildlife Center of Virginia
World Temperate Rainforest Network
Yellowstone Valley Audubon Society
Zumbro Valley Audubon