



*Shaping the future for birds*

## MEMORANDUM

To: David Peters (Saginaw Bay Seasonal Bird Survey), Joseph Soehnel (Saginaw Bay Birding), Louie Dombroski (MI Seasonal Bird Survey), Allen Chartier (MI Seasonal Bird Survey), Caleb Putnam (MI IBA Coordinator), Ed Schools (MI DNR Environmental Review Program)

From: Michael Hutchins, Ph.D., National Coordinator, Bird-Smart Wild Energy Program, American Bird Conservancy

Date: October 30, 2014

**Subject: large-scale commercial wind development in Huron County, Michigan**

Attached please find the letter that the American Bird Conservancy (ABC) has written to FWS Midwest Regional Director, Tom Melius, regarding poorly-sited commercial wind energy development in Huron County, Michigan and its potential impact on ecologically-important, federally-protected birds. The information in this letter may prove useful to you in your local deliberations. From the Letter:

“ABC wishes to express its serious concerns about Heritage Sustainable Energy’s, DTE Energy’s, Exelon Corporation’s and NextEra Energy’s construction or support up to 900 large commercial wind turbines in Huron County (there are 328 turbines there now), Michigan, threatening a major bottleneck for Neotropical migratory birds and raptors, including federally-protected Bald and Golden Eagles. It is also our understanding that many threatened and endangered species, such as the Piping Plover, Kirtland’s Warbler, Henslow’s Sparrow, Short-eared Owl and others, migrate through or inhabit this area (Appendix I prepared by Port Crescent Hawk Watch), triggering serious Endangered Species Act (ESA) concerns. We have reviewed the recent radar studies conducted by USFWS in this area (Appendix II), and must conclude that Huron County is not an appropriate area for wind energy development, given the potential and substantial risks it poses to federally-protected birds. If this is an example of “proper” siting of wind energy development, then we wonder what criteria are being used to make such decisions.

Unfortunately, Huron County, MI is another example of the failure of the current voluntary guidelines to protect our native bird species. The poor siting of both existing and proposed projects should, at the very least, require that the voluntary guidelines be followed to the letter, which means consultation under Section 7 of the ESA, applications for incidental take permits under the ESA and Bald and Golden Eagle Protection Act, a 3 mile set back from any shoreline, and an Avian Protection Plan must be in place before the companies are allowed to go ahead with any construction. We also believe that the presence of endangered and threatened species calls for a more detailed Environmental Impact Statement (EIS) study to be conducted to assess the potential risks instead a cursory Environmental Assessment, and that these should be open for public review and comment.”

Your commitment to Bird Smart wind energy is much appreciated.