Huron County Zoning and Planning Commission  
250 Huron Ave. Room 102  
Bad Axe, MI 48413  
Attention: Jeff Smith, Chairman

Dear Commissioners:

This is just a brief letter to comment on Huron County’s Board of Commissioners Plan to impose a 5-year moratorium on industrial wind energy development. The American Bird Conservancy (ABC) strongly supports such a move, as well as at least a 3-5 mile set back from the Great Lakes.

ABC is a 501(c) (3) not-for-profit membership organization whose mission is to conserve native birds and their habitats throughout the Americas. ABC acts by safeguarding the rarest species, conserving and restoring habitats, and reducing threats, while building capacity in the bird conservation movement.

As you know, ABC has long been concerned about the rapid and extensive development of large, industrial wind projects near the Great Lakes and in and around Important Bird Areas. Our concern has been even more justified by the publication of three U.S. Fish and Wildlife Service (FWS) advanced radar studies showing vast numbers of birds and bats migrating around and over the Great lakes and flying within the rotor swept areas of industrial wind turbines (https://www.fws.gov/radar/factsandfiles/index.html).

ABC supports the development of clean, renewable sources of energy such as wind and solar power, but also believes that it must be done responsibly and with minimal impact on our public trust resources, including native species of birds and bats, and particularly threatened, endangered and other protected species, such as Bald and Golden Eagles. ABC supports Bird Smart Wind Energy, which is described in some detail on our web site (http://www.abcbirds.org/abcprograms/policy/collisions/wind_developments.html) and in Hutchins et al (2016) (http://www.berrymaninstitute.org/files/uploads/pdf/journal/spring2016/ABCsBird-SmartHutchinsEtal.pdf). In the case of wind energy, careful siting and tested, effective mitigation is crucial in preventing the unintended impacts to America’s native bird and bat species.

Of particular concern is the potential cumulative impact of all the industrial wind turbine development around the Great Lakes, not only in Michigan, but in Ohio and New York as well. The Great lakes are simply not a good place to be constructing large wind facilities from the perspective of wildlife conservation. In our view, wind turbine development in Huron County has gotten way out of hand and needs to be more carefully regulated and limited.
We sincerely hope that Huron County will take these risks into consideration as it plans for this and future wind energy projects. There are thousands of birders in Michigan, and tens of millions across the U.S., that inject billions of dollars into local economies. In addition, our native birds and bats perform critical ecosystem services worth billions of dollars to our national economy, including pollination, control of agricultural pests, and seed dispersal, and are important to our future.

Poorly sited wind energy projects and their associated power lines and towers are at minimum killing hundreds of thousands, if not millions, of birds and bats annually, including threatened and endangered species. Due to this and other human-caused factors, such as feral cats, building and vehicle collisions and pesticides, the cumulative impact has been great. As a result, even some of our most common avian species’ populations are in precipitous decline, with more than a third now in need of concerted action to ensure their future (https://www.allaboutbirds.org/state-of-north-americas-birds-2016-more-than-one-third-in-need-of-conservation-action/). It is therefore critical that alternative energy is done right.

Thank you for the opportunity to comment.

Sincerely,

Michael Hutchins, Ph.D.
Director, Bird-Smart Wind Energy Campaign