



Shaping the future for birds

Tom Melius
Regional Director, Midwest Region
U.S. Fish and Wildlife Service
5600 American Blvd. West, Suite 990
Bloomington, MN 55437-1458

December 1, 2014

Subject: 50 Turbine Wind Farm in Huron County, Michigan

Dear Regional Director Melius:

ABC wishes to express its serious concerns about a new 50-turbine wind energy project (the Apple Blossom Wind Project) proposed for Michigan's Huron County (http://www.michigansthumb.com/news/local/article_e013d54e-65b5-11e4-9912-1b71147670eb.html).

As mentioned in our October 30, 2014 correspondence, it is 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, triggering serious Endangered Species Act (ESA) concerns. As stated in our previous letter, we have reviewed the recent radar studies conducted by USFWS in this area, 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. The article states that construction is slated to begin by April 2015. ABC would like to know if this project has applied for incidental take permits under Bald and Golden Eagle Protection Act (BGEPA) and ESA, or if it has conducted an EA, or developed an Avian Protection Plan? Has the developer, Geronimo Energy, engaged in Section 7 consultation under the ESA? Given the serious ESA concerns, ABC also believes that a more detailed Environmental Impact Statement (EIS) would be warranted, rather than a cursory EA.

American Bird Conservancy (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.

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



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(http://www.abcbirds.org/abcprograms/policy/collisions/wind_developments.html). In the case of wind energy, careful siting and mitigation is crucial in preventing the unintended impacts to America's native bird and bat species. This risk to birds and bats can be substantial, depending on the circumstances

((<http://onlinelibrary.wiley.com/doi/10.1002/wsb.260/abstract>;
<http://www.sciencedirect.com/science/article/pii/S0006320713003522>).

All of the other points made in our October 30 letter apply to this project as well. ABC will be watching the situation very carefully. Thank you for your attention to these important matters.

Sincerely,

Michael Hutchins, Ph.D.
National Coordinator, Bird Smart Wind Energy Campaign

Cc: D. Ashe