AMERICAN BIRD CONSERVANCY

Shaping the future for birds

Ron Pilette, Chair, Grafton, Vermont Select Board
Frank Seawright, Chair, Windham, Vermont Select Board

October 20, 2016

Dear Mr. Pilette and Mr. Seawright:

The American Bird Conservancy (ABC) appreciates the opportunity to comment on Iberdrola's proposed Stiles Brook Wind Energy Project in Windham and Grafton, Vermont. This project, involving the construction of 24 500-foot tall industrial wind turbines on high mountain ridges, is a potential threat to migratory and resident birds and bats. The area surrounding the site is one of the last undeveloped areas in Vermont and is a significant wildlife habitat. Vast numbers of migratory raptors move through this area and it is an important breeding and foraging area for migratory songbirds, including species of conservation concern.

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, sited appropriately, and designed to have minimal impact on our public trust resources, including native species of birds and bats, and particularly threatened, endangered and other protected species.

ABC developed the concept of Bird Smart Wind Energy, which is described in some detail in Hutchins et al (2016). In the case of wind energy, careful wind generation siting is crucial in preventing the unintended impacts to America's native bird species. ABC has serious concerns about the potential impact of the proposed Icebreaker Offshore Wind Energy Project on the seasonal and resident avian and other wildlife populations in this region, particularly on the Bicknell's Thrush, a species of high conservation concern.

The wind energy industry publically claims to be concerned about bird and bat mortality, but continues to try to build large, commercial wind energy facilities in major migratory corridors and sensitive breeding areas for birds and bats in the United States (Casey 2015), thus placing our continent's ecologically important wildlife at great risk. In the case of wind energy, careful wind generation siting is crucial in preventing the unintended impacts to native bird and bat species, and ABC is concerned that the proposed site for this project poses an unacceptably high risk to some species of conservation concern, notably Bicknell's Thrush and various warbler species. In the United States, the second leading wind power producer in the world, this risk can be substantial, with hundreds of thousands of birds and bats being killed annually, at minimum, through collisions with the fast-moving turbine blades (Erickson et al. 2015, Smallwood, 2013, Loss et al. 2013). This estimate balloons into the tens of millions when collisions and electrocutions at their associated infrastructure, notably power lines and towers, are included (Loss et al. 2015).

Bicknell's Thrush (*Catharus bicknelli*) is a rare habitat specialist that breeds at high elevations in the balsam fir and red spruce forests of the northeastern United States and southern Canada,

including in the area of this proposed wind energy project (McFarland et al. 2005, Rimmer et al. 2013). This species is rare and declining (IBTCG 2010) and losses due to the poorly sited Stiles Brook Wind Energy Project would contribute to that decline. This species is currently being considered for Endangered Species status in the U.S. and IUCN-The World Conservation Union has listed it as "Globally Vulnerable."

Wind energy developers are supposed to evaluate the risks to wildlife prior to proposing a project. However, hiring paid consultants to collect pre-construction risk assessments preordains the result and is a clear violation of scientific integrity practices:

"Scientists with conflicts of interest are viewed as being at least partially integrity-compromised, and, even with complete and open disclosure, are regarded, at least to an extent, as of suspect scientific credibility" (Rowe and Alexander 2012).

It is therefore not surprising that independent researchers have found a very poor correlation between pre-construction risk studies at wind energy facilities and actual number and type of birds killed post-construction (Ferrer et al, 2011).

Transparency of bird and bat kill data has been a continuing and serious problem with wind energy development in the United States, including with this developer (Associated Press 2015, Jackson 2016). If this project is eventually built despite heavy local and national opposition, then all post-construction bird and bat fatality data should be collected by independent, third-party experts using standardized methods and reported directly to regulatory agencies (ABC 2015, Clarke 2014). These data should also be made available to the public and concerned conservation organizations. Whether on public or private lands, these are public trust resources and the public has a right to know. A plan for compensating the public for any loss of federally protected species should be established before any construction takes place, and should include setting aside or rehabilitating additional lands outside the project area for bird and bat conservation purposes. If and when data show that large numbers of birds and bats are taken by the project when it begins operation, especially federally protected species, then the option of total shut down and dismantlement of the turbines must be considered – and that should be made clear at the outset.

Last, but not least, the project developers must in detail explain how they plan to mitigate for any losses of birds and bats at their facility. Although the wind industry purports to know how to mitigate for bird and bat deaths, few of these methods have been tested for their efficacy. According to a recent review (Arnett and May 2016), the only proven methods of mitigation to reduce bird deaths were proper siting (which this project violates) and curtailment of the turbine blades. The latter option is highly unpopular with wind energy developers as it cuts into their profit margin.

ABC questions whether the sacrifice of hundreds of thousands, if not millions, of our shared ecologically important birds and bats justifies building any large, commercial wind energy facility in areas with seasonally high concentrations of birds and bats, like Vermont's Meadowsend Timberlands. The ecological services—pest control, pollination, and seed dispersal--that birds and bats provide are worth billions to the U.S. economy, including to farmers and farming communities in Vermont (Sekercioglu, 2015, Sekercioglu et al. 2016. Yet, many of North America's bird species are in precipitous decline, with over a third in need of concerted conservation action (North American Bird Conservation Initiative 2016). In a recent survey, a majority of U.S. voters supported additional protections for migratory birds from energy development (National Audubon Society 2016).

Thank you for your consideration.

Respectfully Yours,

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

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

References

American Bird Conservancy (ABC). 2016b. Wind energy company sues to keep bird kill data out of public's hands: Case highlights need for more openness about risks to wildlife. https://abcbirds.org/article/wind-energy-company-sues-keep-bird-kill-data-publics-hands/

Arnett, E.B. and May, R.F. 2016. Mitigating wind energy impacts on wildlife: Approaches for multiple taxa. Human-Wildlife Interactions 19: 28-41. http://www.berrymaninstitute.org/files/uploads/pdf/journal/spring2016/MitigatingWindEnergyArnett May.pdf

Associated Press. 2015. PacifiCorp sues to block release of bird-death data at wind farms. Oregonlive.com: http://www.oregonlive.com/business/index.ssf/2014/11/pacificorp_sues_to_block_relea.html

Casey, M. 2015. 30,000 wind turbines located in sensitive areas for birds. CBSNews.com: http://www.cbsnews.com/news/30000-wind-turbines-located-in-critical-bird-habitats/

Clarke, C. 2014. It's time for independent monitoring of wildlife kills at renewable energy sites. KCET: https://www.kcet.org/redefine/its-time-for-independent-monitoring-of-wildlife-kills-at-renewable-energy-sites

Erickson, W.P., Wolfe, M.M., Bay, K.J., Johnson, D.H., and Gehring, J.L. 2014. A comprehensive analysis of small-passerine fatalities from collision with turbines at wind energy facilities. Plos One: http://journals.plos.org/plosone/article?id=10.1371/journal.pone.0107491

Ferrer, M., de Lucas, M., Janss, G.F., Casado, E., Munoz, A.R., Bechard, M.J., and Calaqbuig, C.P. 2011. Weak relationship between risk assessment studies and recorded mortality in wind farms. Journal of Applied Ecology 49: 38-46.

Hutchins, M., Parr, M. and Schroeder, D. 2016. ABC's bird smart wind energy campaign: protecting birds from poorly sited wind energy development. Human Wildlife interactions 10 (1): 71-80. http://www.berrymaninstitute.org/files/uploads/pdf/journal/spring2016/ABCsBirdSmartHutchinsEtal.pdf

IBTCG. 2010. A Conservation Plan for Bicknell's Thrush (Catharus bicknelli) J.A. Hart, C.C. Rimmer, R. Dettmerrs, R.M. Whittam, E.A. McKinnon, and K.P. McFarland, eds. International Bicknell's Thrush Conservation Group. www.bicknellsthrush.org

Jackson, T. 2016. Wind farm sues to block bird death data release. Sandusky Register:

http://www.sanduskyregister.com/Environment/2016/06/24/Wind-farm-sues-to-block-bird-deathdata-release

Loss, S.R., Will, T., and Marra, P.P. 2013. Estimates of bird collision mortality at wind facilities in the contiguous United States. Biological Conservation 168: 201–209.

Loss, S.R., Will, T., and Marra, P.P. 2015. Refining estimates of bird collision and electrocution mortality at power lines in the United States. PLoS ONE 9(7): e101565. doi:10.1371/journal.pone.0101565.

Maxwell, S.L., Fuller, R.A., Brooks, T.M., and Watson, J.E.M. 2016. The ravages of guns, nets and bulldozers. Nature 536: 143-145.

McFarland, K., Lambert, J.D., Rimmer, C.C., Faccio, S.D., and Atwood, J.L. 2013. A practical model of Bicknell's thrush (*Catharus bicknelli*) breeding in northeastern United States. Wilson Bulletin 117: 1-11.

National Audubon 2016. A majority of registered voters want stronger protections for birds. http://www.audubon.org/news/a-majority-registered-voters-want-stronger-protections-birds

North American Bird Conservation Initiative. 2016. State of the Birds, 2016. http://www.stateofthebirds.org/2016/wp-content/uploads/2016/05/SotB_16-04-26-ENGLISHBEST.pdf

Rimmer, C.C., Faccio, S.D., and McFarland, K.P. 2013. Long-term Avian research and Monitoring on Mt. Mansfield, Vermont. 2012 Report to the Vermont Monitoring Cooperative. Vermont Center for Ecostudies.

Sekercioglu, C. H. 2006. Increasing awareness of avian ecological function. Trends in Ecology and Evolution 21:464–471.

Sekercioglu, C. H., D. G. Wenny, and C. G. Whelan, editors. 2016. Why birds matter: avian ecological function and ecosystem services. University of Chicago Press, Chicago, Illinois, USA.

Smallwood, S.K. 2013. Comparing bird and bat fatality rate estimates among North American windenergy projects. Wildlife Society Bulletin 37 (1): 19–33.