



Huron County Planning Commission
c/o Jeff Smith
Huron County Building
250 E. Huron Ave.
Bad Axe, MI 48413

3 December 2014

Dear Commissioners:

Audubon wishes to voice concerns over potential bird impacts surrounding the potential installation of wind turbines in the Saginaw Bay Important Bird Area (IBA), including several turbines within three miles of the Lake Huron shore. We support wind power where properly sited as a means of combating climate change. Audubon believes we must find those cases where clean power can supply our energy needs while imposing minimal harm to wildlife, particularly birds and bats.

Local planning boards face difficult decisions around the issue of proper siting, and we wish to provide relevant bird data and some recommendations to the Huron County Planning Commission. To develop wind power while protecting wildlife it is necessary to understand the risk profiles of proposed sites and to take the necessary steps to mitigate negative effects, whether this be through deterrence measures, compensatory mitigation, turbine curtailment, or project relocation or cancellation. Some sites will need to be abandoned, but others will be developed, and it will be important that appropriate measures are taken to minimize the risks to wildlife. The ability to do so relies upon having basic information on the level and type of risk, so that appropriate siting and mitigation strategies can be tailored to the sites.

The standard for how to conduct wind project risk assessments is the Land-Based Wind guidelines published by the US Fish and Wildlife Service (hereafter USFWS). The guidelines provide a science-based, data-driven blueprint applicable to any land-based wind facility, and Audubon strongly supports the processes established in this document. However, adherence to these federal guidelines is voluntary. We recommend that the Huron County Planning Commission strive to ensure that the USFWS guidelines are followed for all wind development in Huron County, and to permit facilities only if they have demonstrated that there will not be substantial adverse impacts to bird species of concern in the state. Most importantly, we urge the commission to **require the three mile Lake Huron turbine-free buffer**. We suggest that the risk assessment incorporate those species listed below, which were the basis on which the IBA was designated. Audubon also supports post-construction monitoring of windfarms where necessary as described in the USFWS Guidelines, and establishing as a condition of the permit that the developer will be responsible for undertaking necessary compensatory mitigation using a framework similar to that described in the USFWS Guidelines.

Saginaw Bay is a globally-significant Important Bird Area (IBA). This means the site is vital to the long-term conservation of birds in the global context. Global significance is the highest designation given to IBAs, and emphasizes a high degree of responsibility to the land managers of these areas. Saginaw Bay was designated as such because of a large number of waterfowl using the Bay (notably Tundra Swans, Redhead, Common Goldeneye, and Common Mergansers), because of nesting colonial birds on offshore islands (Black-crowned Night-Herons, Caspian Terns, Ring-billed Gulls), and also because of migrating raptors in spring. The boundary of the IBA extends 15 miles inland (Fig. 1), reflecting the use of inland agricultural fields by Tundra Swans (see below). Because of the heavy use of the near-shore area by both migratory raptors and landbirds we ask the Planning Commission again to institute ***a 3 mile buffer to Lake Huron, within which turbines should not be allowed.***

Should windfarms be constructed anywhere else in Huron County, the following species should be strongly considered for potential impacts.

Tundra Swan: About 12,000 Tundra Swans use this IBA twice a year, first in March and April, and again in October to December. This species is the primary reason the IBA extends inland, and use is mainly restricted to the west side of the thumb (see IBA boundary in Fig. 1). At night the birds roost on the water of the Bay, but by day they fly inland to feed in the fields (Audubon IBA Database, unpub. data). They will likely avoid the turbines *if turbines are visible*, but if foggy conditions arise during daylight hours, or birds are flying at dawn or dusk, there is a strong possibility of collision (Larsen and Clauson 2002). Curtailment of turbines during low-visibility conditions when swans are present is advised.

Bald Eagle: This species is relatively numerous in Huron County at all times of year, with nesting birds, migrants from elsewhere, and wintering individuals (eBird 2014). They are vulnerable to collisions, so some mortality is likely. This species is federally protected under the Bald and Golden Eagle Protection Act (BGEPA), and the developer will need to apply to the USFWS for take permits if there is a risk of adverse impacts to Bald Eagles in the area. We strongly recommend that the Planning Commission require the developer to document that it has either applied to the USFWS for an eagle take permit or produce written correspondence from the regional USFWS that waives the need for such an action.

Golden Eagle (eastern North American population): This species occurs in small numbers and its distribution here is poorly understood. It migrates through the area mainly in spring (based on published satellite transmitter data and hawk count data), and possibly winters in very small numbers, so there is some risk of mortality. Because it is also protected under the BGEPA statute, it triggers the same oversight from the USFWS. We recommend the same permit conditions as described for Bald Eagles.

Migrating raptors: At least 15 species of day-migrating raptors (such as Turkey Vultures, Red-tailed Hawks, and American Kestrels) concentrate along the shore of Saginaw Bay each spring, from mid-March to mid-June (HMANA 2015). Eight of these (Osprey, Bald Eagle, Northern Harrier, Cooper's hawk, Northern Goshawk, Red-shouldered Hawk, Merlin, and Peregrine Falcon) are priority species in the Michigan Wildlife Action Plan. These species get trapped in the tip of the thumb because they cannot

cross the open water of Lake Huron as they migrate north, forcing tens of thousands of birds to gather along the lakeshore. The three mile buffer to Lake Huron is vitally important to this group, as the concentrations of birds are not documented to occur greater than 2-3 miles inland.

Short-eared Owl: This species is state endangered and rare, but occurs in small numbers during late October to April. It nests farther north in Canada (eBird 2014). It inhabits open grassy habitats and is mostly nocturnal, and will likely fly high enough to collide with turbines. We do not know the actual risk to this species, and all mortality should be closely monitored after construction. We recommend communication with the Michigan Department of Natural Resources to determine the risk to this species, and any necessary actions to minimize adverse impacts.

Thank you for considering our letter on this important topic.

Respectfully,

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www.importantbirdareas.org