



Bringing back the birds

Diana Heyder
NEPA Division
U.S. Department of Energy

April 5, 2017

Dear Ms. Heyder:

The American Bird Conservancy (ABC) is writing to express its serious concerns about the experimental deepwater floating offshore wind energy project located near Monhegan Island, Maine. Located within 20 miles of the island--a major stop over habitat for migratory birds--this project has the potential to have significant environmental impact.

We are particularly concerned about the lack of information concerning the migratory movements of birds off the coast of Maine. Of particular concern may be harm to the endangered Roseate Tern, a federally protected species that migrates along the Atlantic coast and breeds on offshore islands, ranging from New York to Maine. This species feeds in coastal waters and often forages a considerable distance from land, especially when foraging for chicks.

As pointed out in a recent letter to the Bureau of Ocean Energy Management (BOEM), the presence of the Roseate Tern will necessitate Environmental Impact Statements (EISs) and Section 7 consultation with the U.S. Fish and Wildlife Service for each project considered. Over 330 species have been recorded on tiny Monhegan Island. The federally protected species that pass through the Gulf of Maine also include the Piping Plover and Bicknell's Thrush and the state-endangered Peregrine Falcon. Many other migratory species of special concern also occur in this region.

ABC supports the development of clean, renewable sources of energy such as wind power, but also believes that it 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.

ABC is a proponent 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 native bird and bat species, and ABC is concerned that the proposed site for this project poses an unacceptably high risk to protected and shared Canadian and U.S. wildlife. 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; Smallwood and Thelander 2008). 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). Wind turbines are also known to cause displacement and reproductive failure in declining grassland breeding birds (e.g., Shaffer and Buhl 2015, Stevens et al. 2013). Displacement could easily occur in marine species as well.

ABC has written to BOEM and NOAA about the dangers inherent to wildlife in offshore wind development (see attached). As with onshore wind turbines, siting is critical. Unfortunately, the technologies for both assessing impact pre-construction and monitoring impact post-construction are not as well developed for offshore wind energy as they are for onshore wind energy. ABC is therefore



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concerned that the actual impact on our Nation's birds will be difficult, if not impossible to assess over open water where carcasses will be lost.

To reduce or avoid potential avian losses from wind energy development, every effort should be made to keep turbines away from major migratory routes, important foraging areas or key breeding sites. Addressing climate change is important, but not at the expense of our ecologically and economically important birds (Sekercioglu et al. 2016).

Thank you for the opportunity to comment.

Respectfully Yours,

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

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