



*Shaping the future for birds*

April 28, 2010

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The Honorable Ken Salazar  
Secretary  
U.S. Department of the Interior  
1849 C Street, NW  
Washington, DC 20240

Dear Secretary Salazar:

I am writing on behalf of American Bird Conservancy to express our support for wind power development in the U.S., but also to request that you make federal regulations regarding the impacts of wind turbines on birds and other wildlife mandatory rather than voluntary. We would like to meet with you at your earliest convenience to discuss these points in more detail.

Wind farms are capable of both displacing birds from their habitats, and of killing migratory birds that collide with turbines. These problems are solvable however, and can be addressed effectively at minimal cost to industry and at no cost to American jobs.

We believe that the U.S. Fish and Wildlife Service (FWS) has done an excellent job in developing wind guidelines that will reduce bird and other wildlife impacts from wind, but evidence strongly suggests that unless those guidelines become required regulations, rather than voluntary guidelines, then the wind industry will ignore them. In fact, industry could have been acting to reduce bird mortality for more than 20 years, but has failed to do so under its own volition.

Recently, the Bureau of Land Management (BLM) released wind guidelines for their lands in Wyoming that provide much greater leniency to industry than is recommended by FWS, threatening habitat for the Greater Sage-Grouse, which was recently recognized as a candidate for listing under the Endangered Species Act. The FWS recommendations state: "...development within three to five miles (or more) of active sage grouse leks may have significant adverse impacts on the affected grouse population." Yet the BLM guidelines call for a



0.6 mile buffer around leks! These guidelines need to be consistent, and the FWS guidelines have actual data to support the larger buffer distance. We cannot expect industry to follow the voluntary FWS guidelines, when government agencies seem unable to do so.

For these reasons, we believe that it is imperative that you take firm action now to ensure that the proposed build-out of wind does not further decimate American bird populations, which already face a barrage of threats as detailed in the multi agency and NGO-authored *State of the Birds 2010 Report*.

Additional specific items within the guidelines of particular importance to birds are:

- 1) Wind project sites should be carefully evaluated at the proposal stage for habitat conflicts and migratory bird collision risks, and projects should avoid sensitive sites such as Important Bird Areas, Wildlife Refuges, and areas of concentrated bird use.
- 2) Short-term operational shut-downs of turbines should be required at times during which large numbers of migratory birds can be predicted to pass through a wind project.
- 3) Infrastructure such as power lines and lighting should be minimized, and designed not to interfere with the migration of birds such as the Endangered Whooping Crane.
- 4) We would also like to recommend a habitat mitigation banking program to offset the footprint of wind farms and to permanently protect a comparable amount of high-quality habitat to that affected by the turbines and associated development.

American Bird Conservancy believes in the future of wind energy for America, and feels strongly that getting it right from the start can be job-friendly, bird-friendly, and environmentally sound and sustainable.

We would be very interested to meet with you at your earliest convenience to discuss these points in more detail. I will call your office to see when we might schedule a meeting.

Sincerely,



David Younkman  
Vice President and Chief Conservation Officer  
American Bird Conservancy