

Groups that have asked for mandatory measures to protect wildlife at wind energy projects, 3-5-12

1. American Bird Conservancy
2. Sierra Club
3. Cornell Laboratory of Ornithology
4. Endangered Species Coalition
5. Center for Biological Diversity American
6. Birding Association
7. Alabama Ornithological Society
8. Aldo Leopold Audubon Society
9. Alliance to Protect Nantucket Sound
10. Allegheny Front Alliance)
11. Allegheny Highlands Alliance
12. Arctic Audubon Society
13. Arkansas Audubon Society
14. Animal Welfare Institute
15. Audubon Dallas, Dallas
16. Audubon Naturalist Society
17. Audubon Outdoor Club of Corpus Christi
18. Audubon Society of Corvallis
19. Audubon Society of Greater Denver
20. Audubon Society of New Hampshire
21. Audubon Society of Northern Virginia
22. Back Country Against Dumps
23. Bartramian Audubon Society
24. Bergen County Audubon Society
25. Bexar Audubon Society
26. Biodiversity Conservation Alliance
27. Bird Conservation Network
28. Bird Refuge of York
29. Black Swamp Bird Observatory
30. Blue Ridge Mountain Defenders
31. Carpenter St. Croix Valley Nature Center
32. Center for Native Ecosystems
33. Central New Mexico Audubon Society
34. Citizens Committee to Complete the Refuge
35. Chesapeake Audubon Society
36. Chesapeake Wildlife Heritage
37. Civitas
38. Clearwater Audubon Society, Inc.
39. Coastal Bend Audubon Society
40. Coastal Virginia Wildlife Observatory
41. Connecticut Audubon Society
42. Conservation Biology Institute
43. Conservation Council for Hawai'i
44. Conservation Congress
45. Conservation Federation of Missouri
46. Delaware Valley Ornithological Club
47. Delmarva Ornithological Society
48. Desert Cities Bird Club
49. Desert Protective Council

50. Detroit Audubon Society
51. Desert Protection Society
52. East Cascades Audubon Society
53. East County Community Action Coalition
54. Eastern Long Island Audubon Society
55. Eastern Sierra Audubon Society
56. Elisha Mitchell Audubon Society
57. Endangered Habitats League
58. Environment for the Americas
59. Environmental Protection Information Center
60. Flathead Audubon Society
61. Foothills Audubon Club
62. Fort Collins Audubon Society
63. Freeport Wild Bird Supply
64. Friends of Beautiful Pendleton,
65. Friends of Blackwater Canyon
66. Friends of Dyke Marsh
67. Friends of Lānaʻi
68. Friends of Loxahatchee
69. Friends of the Allegheny Front
70. Friends of the Boundary Mountains
71. Friends of the Columbia Gorge
72. Georgia Important Bird Area Program
73. Golden Eagle Audubon Society,
74. Highlanders for Responsible Development
75. The Horus Institute for Environmental Conservation and Development
76. Houston Audubon
77. Hoy Audubon Society, Inc.
78. Huntington-Oyster Bay Audubon Society
79. Juneau Audubon Society
80. Kalmiopsis Audubon Society
81. Keepers of the Blue Ridge
82. Kern Audubon Society
83. The Kerulos Center
84. Kiesha's Preserve
85. Klamath Forest Alliance
86. Lahontan Audubon Society
87. Lake Maxinkuckee Environmental Council
88. The Lands Council
89. Laurel Mountain Preservation Association
90. Lehigh Gap Nature Center
91. Long Point Waterfowl
92. Madison Audubon Society
93. Maryland Conservation Council
94. Maryland Ornithological Society
95. Maui Tomorrow Foundation, Inc.
96. Michigan Audubon
97. Monmouth County Audubon Society
98. Mountain Preservation Association
99. Mountain Ridge Protection Act Alliance, North Carolina
100. North American Grouse Partnership
101. North Dakota Chapter of The Wildlife Society
102. Northeast Regional Migration Monitoring Network

103. North Fork Audubon Society
104. Northwest Arkansas Audubon Society
105. Oakland (Michigan) Audubon Society
106. Ohio Ornithological Society
107. Ohlone Audubon Society
108. Olympic Forest Coalition
109. Oregon Wild
110. Palouse Audubon Society
111. Prescott Audubon Society
112. Protect Our Communities Foundation
113. Public Employees for Environmental Responsibility
114. Quad City Audubon Society
115. Red Rock Audubon Society
116. Ripley Hawk Watch
117. Roanoke Valley Bird Club
118. Sacramento Audubon Society
119. Salem Audubon Society
120. Save Western Maryland
121. San Diego Audubon Society
122. Saving Birds Thru Habitat
123. Sierra Foothills Audubon Society
124. Sky Hunters Raptor Rehabilitation and Education
125. South Bend-Elkhart Audubon Society
126. Southeast Volusia Audubon Society
127. South Florida Audubon Society
128. Stewards of the Potomac Highlands
129. St. Louis Audubon Society
130. St. Paul Audubon Society
131. Taku Conservation Society
132. Tarrant Coalition for Environmental Awareness
133. Tennessee Ornithological Society
134. Tippecanoe Audubon Society
135. Tortoise Reserve, Inc
136. Travis Audubon
137. The Trumpeter Swan Society
138. The Union Beach Environmental Trust
139. The Urban Wildlands Group
140. Vermont Center for Ecostudies
141. Victor Emanuel Nature Tours
142. Virginia Forest Watch
143. Virginia Society of Ornithology
144. West Pasco Audubon Society
145. Western Nebraska Resources Council
146. Western Watersheds Project
147. White Flicker Wild Bird Rehabilitation Clinic
148. Wildlife Advocacy Center
149. Wildlife Information Center
150. Wisconsin Audubon Council
151. Wisconsin Society for Ornithology
152. Wyoming Outdoor Council

BY BARBARA BOYLE

A LETTER FROM MICHAEL BRUNE

Sierra Club Supports Mandatory Wind Guidelines For Wildlife Avoidance, Minimization, And Mitigation

Last year, Sierra Club signed comments with several other environmental organizations supporting U.S. Fish and Wildlife Service's (FWS) proposed voluntary guidelines for avoiding, minimizing and mitigating wildlife impacts from wind energy projects (see *Desert Report* September 2011 article for description of draft guidelines). The rationale was that given the limited resources and authority of FWS at this time, working with the wind industry through voluntary guidelines offered a chance to actually extend protection to endangered and threatened species in the near term. However, some Club activists were properly concerned that voluntary guidelines were inadequate to address the serious impacts of wind en-

ergy on birds and bats. Desert Energy Subcommittee Chair Joan Taylor brought this to the attention of Beyond Coal staff and volunteer leader Dick Fiddler, and the Club's Vice President Dave Scott. After a review, a decision was made to add to and clarify our position on these guidelines. A letter signed by Michael Brune was then sent to Interior Secretary Salazar making it clear that ultimately the protective guidelines must be mandatory and that the resources and authority given to FWS must be enhanced so that they have the tools to do this important job. The following is the text of the letter.
– Barbara Boyle, Sr. Western Representative, Beyond Coal Campaign



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January 26, 2012

Secretary Ken Salazar
U.S. Department of the Interior
1849 C Street, N.W.
Washington DC 20240

Dear Secretary Salazar,

The Sierra Club writes to clarify its position regarding the draft Land-Based Wind Energy Guidelines currently being considered by the Fish and Wildlife Service.

The Sierra Club cosigned the May 19, 2011 letter submitted by Defenders of Wildlife, the Audubon Society, and other organizations requesting changes to the draft guidelines and supporting their codification. Though we did not participate directly in the committee, in that letter we supported the concept of the Wind Turbine Guidelines Advisory Committee and the idea that environmentalists and the wind industry could work jointly to achieve protection for birds and other wildlife species that outstrips the results that are occurring under the current regulatory regime. The letter acknowledged the need for cooperation and good faith to compile the necessary information to achieve the best outcomes for species protection while continuing to increase our national inventory of wind generation.

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The Sierra Club strongly supports wind energy. Accelerating the shift to cleaner energy sources must take place in order to have a chance to stem the worst predicted effects of climate change and reduce the impact of fossil fuels on public health and the environment. However, that May 19 letter catalyzed a broader discussion within the Sierra Club about real threats to iconic species in some of the most critical habitat and migration sites in the nation, and the discussion exposed concerns that a framework of voluntary standards will not adequately protect those most vulnerable species in the places where they are most at risk. In the longer term, the Sierra Club believes that a system of mandatory guidelines is necessary, and that it must be properly framed to both address the agency's responsibilities to protect wildlife under the several relevant statutes and also meet the planet's immediate need for renewable energy sources. Such mandatory guidelines must be accompanied by allocation of sufficient staff and other resources to the Fish and Wildlife Service to allow the agency to implement practical guidelines in a fair and timely manner, so that adequately-sited projects can proceed as quickly as possible.

We agree with the concerns raised by the Advisory Committee and others that FWS does not have the resources and other support at this time to fully carry out the dual priorities of careful protection of species and timely approval of well-sited projects. The Sierra Club will continue to advocate for such resources and support. Until that is realized, FWS must meet the challenge of doing the best it can to fulfill the responsibilities of species and land protection while also furthering good wind projects.

The Sierra Club believes that the wildlife values embodied in the Migratory Bird Treaty Act, the Bald and Golden Eagle Protection Act, the Endangered Species Act, and other statutes should be protected by the full weight of the enacted laws and strong enforcement thereof. We also understand that zero wildlife impacts are not consistent with expanding wind generation, and that getting wind energy right requires the development of technology and practice in a way that increases effectiveness and reduces cost over time. While, ideally, that would be best accomplished in a non-adversarial atmosphere free of the constant threat of litigation, our experience is that less scrupulous actors will exploit cracks in the system unless minimum enforcement standards are in place.

For any interim system to be as effective as possible, the industry must display exemplary responsibility on a consistent basis. Similarly, the FWS must show enough aggressiveness and energy to demand quality planning and mitigation, or to make real the threat of sanctions and prosecution. An abdication of those responsibilities on either side will result in the failure of such an interim system.

Whatever interim system is put into place, the Sierra Club will be watching its performance closely. Should developers routinely fail to submit quality plans, or should the agency fail to adequately police their performance in a way that results in the endangerment of critical species, the Sierra Club will not hesitate to use the remedies available to us to protect wildlife in specific locales, or to ultimately achieve a more protective regulatory regime. In addition, the Sierra Club will press for resources and standards which allow prompt approval of adequately-sited projects.

The Sierra Club looks forward to having an active and productive role in helping to assure that the FWS is fully able to carry out these important responsibilities in a balanced manner. We are happy to discuss our concerns with you at your convenience

Sincerely,



Michael Brune
Executive Director
Sierra Club