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WILDLIFE ADVOCATES CALL ON CORPS TO RETRACT BIRD DEATH FIGURE
Wind facility may kill many more animals, says The Humane Society of the United States

CAPE COD – A widely publicized figure predicting that an offshore wind facility could kill 364 birds per year is not supported by the applicant's own data, according to The Humane Society of the United States (HSUS). The animal protection organization is calling on the U.S. Army Corps of Engineers to retract this estimate, which is included in a draft environmental impact statement (DEIS) on the facility issued this week.

The Corps released the DEIS in response to a permit application by a private developer, Cape Wind Associates, to erect 130 energy-producing turbines in waters off the coast of Cape Cod. Each of the turbines would tower 420 feet over the water surface.

The DEIS appears to have arrived at the figure of 364 bird deaths by multiplying the number of turbines (130) by a per-turbine estimate of bird deaths (2.8) based on some land-based wind facilities.

"We wholeheartedly support the development of wind energy facilities in locations where they will not harm wildlife," said Jessica Almy, wildlife advocate. "In considering this offshore proposal, however, the Corps of Engineers seems to have reached an arbitrary conclusion based on questionable assumptions."

The Corps' formulaic approach to estimating bird mortality is not supported by current research protocols, Almy said. A more meaningful approach to evaluating a project's risk to wildlife would incorporate, among other things, information about wildlife use of the area, such as the visual and radar data provided by the applicant, or aerial surveys conducted by the Massachusetts Audubon Society. This approach is supported by an industry guidance document entitled, "Studying Wind Energy/ Bird Interactions."¹

In some cases, passage rates of birds, like those described in the DEIS, can give some indication of potential collisions. Based on data collected in Nantucket Sound by the applicant, the Corps estimates that "over 600,000 birds could be flying at rotor height in any given year" (page 5-130).

Even if such a simple and unreliable formula were used to estimate the number of bird mortalities, it is unclear why the authors of the DEIS chose one death estimate over others. Just four paragraphs earlier in the DEIS, for example, the Corps references a Dutch study that measured bird mortality at wind turbines in low-lying areas adjacent to the Wadden Sea. This research found that the turbines each killed 0.04 to 0.14 birds per day. An extrapolation of this figure to a wind energy facility the size of the Cape Wind project would lead to an estimation of 1,898 to 6,643 bird deaths each year.

Moreover, even the land-based estimate in the DEIS appears arbitrary. The National Wind Coordinating Committee estimates that wind energy facilities in the eastern United States kill 4.0 to 7.7 birds per turbine per year.² The DEIS does not adequately justify choosing an estimate that's not supported by national and international research.

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¹ Available at http://www.nationalwind.org/pubs/avian99/Avian_booklet.pdf

² Available at http://www.nationalwind.org/pubs/wildlife_factsheet.pdf

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A member of the SafeWind coalition (SafeWind.Info), The HSUS has additional concerns about the DEIS, Almy said, including similarly inadequate and inappropriate analyses of the project's effect on bats and marine life. For example, information in the DEIS on endangered whales and their response to vessels in the area is directly contradicted by a recently released National Marine Fisheries Service plan that attempts to reduce vessel impacts on these animals. Similarly, the discussions in the DEIS of cumulative impacts on fragile bird and marine species are inappropriately narrow and do not meet the standards issued by the President's Council on Environmental Quality.

Although the DEIS concludes that a wind energy facility will have minimal impact on wildlife species in Nantucket Sound, The HSUS believes that this conclusion is premature, is based on inadequate study and analysis, and sets a bad precedent for other wind projects.

"The HSUS would love to support a project that promises clean energy, but we cannot at this time support the Cape Wind proposal. The DEIS contains insufficient information to convince us that this project will not cause staggering damage to wildlife populations and fragile marine habitat," Almy said. "We believe that the Corps and the applicant need to conduct the studies recommended by the U.S. Fish and Wildlife Service and take a thorough look at all relevant studies available, so this permit decision is based on a more realistic understanding of the impact this project may have on wildlife."

The HSUS is the nation's largest animal protection organization with over seven million members and constituents. The HSUS is a mainstream voice for animals, with active programs in companion animals, wildlife, animals in research and farm animals and sustainable agriculture. For 50 years, The HSUS has protected all animals through legislation, litigation, investigation, education, advocacy and field work. The non-profit organization is based in Washington, DC, operates a wildlife rehabilitation hospital in West Barnstable, Mass., and has 10 regional offices across the country. For more information, visit The HSUS' Web site – www.hsus.org.