

BOARD OF DIRECTORS

August 3, 2017

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Hon. Kathleen H. Burgess, Secretary
Public Service Commission
Three Empire State Plaza
Albany, NY 12223-1350

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Dear Secretary Burgess,

Alex Zagoreos
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I am writing to express Audubon New York's concern with the Avangrid Renewables/Iberdrola Horse Creek Wind Energy Project proposed to be built in Jefferson County, New York. This large, commercial wind energy facility, located near the town of Clayton, is to include forty 585-foot tall turbines. Audubon New York, the state program of the National Audubon Society, has an interest in this project because it is located within an area Audubon recognized as the Perch River Important Bird Area.

Ross Whaley
Secretary

Important Bird Areas (IBAs) provide critical habitat for birds. Sites are recognized as IBAs if they support populations of at-risk species (e.g., federally or state-listed), large congregations of birds, or assemblages of birds that are considered to be a conservation responsibility. The Perch River IBA was identified as an IBA because it supports one of the largest concentrations of breeding grassland birds in the state, including several species listed as threatened by the New York State Department of Environmental Conservation (DEC) such as Northern Harrier (documented in 2017*), Upland Sandpiper (documented in 2017*), and Henslow's Sparrow (documented in 2016*). Additional grassland bird species supported at the site include Grasshopper Sparrow, Bobolink, and Eastern Meadowlark, all of which have been identified as High Priority Species of Greatest Conservation Need by the DEC and were documented in 2017*. The site also supports an assemblage of priority shrub nesting species, including American Woodcock, Willow Flycatcher, Brown Thrasher, Blue-winged Warbler, Eastern Towhee, and Field Sparrow.

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Audubon New York supports the development of alternative sources of energy, including wind power, but only when developed in low risk areas. Documented bird deaths associated with wind developments most often occur among hunting raptors or nocturnal migrants. In addition to bird deaths caused by collisions, the construction of wind turbines destroys habitat and displaces nesting birds, and may degrade the surrounding habitat from the perspective of certain bird species, in particular grassland birds.

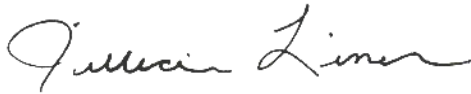
We ask that Public Service Commission seriously consider the risks this proposed project will pose to the critical grasslands in the project area. Potential risks to grassland birds include habitat loss from the "footprint" of the development and associated construction, habitat fragmentation (dividing a larger habitat area into many smaller patches), degradation of surrounding habitat value, displacement from otherwise suitable habitat, and mortality due to collisions. In order to breed successfully, grassland birds generally require large, open spaces far from predators, with open, unobstructed views to spot approaching predators. Several species, including the Northern Harrier and Henslow's Sparrow, prefer fields of 100 acres or more in size.

Grassland birds can be displaced when their habitats are destroyed or the impression of openness is compromised by the construction of structures. In regard to collisions, state-listed species such as Upland Sandpiper, Northern Harrier, and Short-eared Owl routinely fly at higher heights, particularly at dusk, which potentially lowers the visibility of the turbines. Since many of the grassland birds found at this site have extremely small populations, any impact to these birds at the local level may have broader, regional significance.

As stated in our 2004 Wind Power Policy, Audubon New York opposes the development of wind farms on sites that are known or determined to be high risk areas to birds and other wildlife, including sites that are major migratory corridors and sites supporting state and federally listed bird species. For the reasons outlined above, Audubon New York does not support the construction of the proposed Horse Creek Wind Energy Project as currently proposed. We recognize the importance of establishing alternative sources of energy, but we cannot support a project with the potential to jeopardize the at-risk species supported at this site.

Thank you for your consideration of this important conservation issue.

Sincerely,

A handwritten signature in cursive script that reads "Jillian M. Liner".

Jillian M. Liner
Director of Bird Conservation

**recent records on bird sightings were retrieved from eBird.org*