



# Genesee Valley Audubon Society

June 11, 2015  
208 Rhea Crescent  
Rochester, NY 14615

Department of Public Service  
Kathleen H. Burgess, Secretary  
Siting Board  
3 Empire State Plaza  
Albany, NY 12223-1350

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Dear Energy Siting Board,

Thank you for the opportunity to comment on Lighthouse Wind, an Apex project located in Niagara and Orleans County. Genesee Valley Audubon Society supports green energy, including wind energy when sited to minimize the impact on birds and other wildlife. The Lighthouse Wind project in the Towns of Somerset and Yates proposed by Apex is in a critical migratory corridor for raptors and small migratory song birds. Placing wind turbines in the proposed location will put millions of birds in danger of collision with the turbines. We need green energy but not at this cost.

Enclosed is the American Bird Conservancy's (ABC) Wind Development Bird Risk Assessment Map (Enclosure 1) which highlights the critical avian migratory corridors around Lake Ontario in orange (yellow). The second enclosure is the ABC's risk assessment map (Enclosure 2); three raptor observatories, Beamer Conservation Area, Braddock Bay, and Derby Hill, that are along the south shore of Lake Ontario are marked. Also enclosed is a table of the previous three years of data (Enclosure 3) collected by the three raptor observatories.

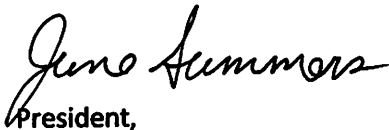
Inspection of the enclosed maps and data should make it obvious that the south shore of Lake Ontario is a critical migratory corridor for raptors and is not a good location for a large scale wind turbine facility because of the impact it will have on raptors including eagles.

From 2009 – 2011 The Nature Conservancy, Audubon New York and the New York Natural Heritage Program conducted a field study to test some key hypotheses on migratory stopover habitat for small neotropical migratory birds along the south shore of Lake Ontario. The purpose in doing so was to learn more about characteristics of these habitats that are difficult to distinguish in remote images. The results were used to create maps predicting where important stopover habitat is and to hone management recommendations. As you can see on the resulting Migratory Bird Stopover Habitat map (Enclosure 4) the area proposed for Lighthouse Wind project has areas shaded in yellow to deep orange. This shading indicates areas predicted to have high to very high abundance and richness of migratory birds during spring and fall migration. This probability of richness during spring and fall migratory season indicates an increased risk of impact to birds by wind turbines placed in this region. Also on this map directly south of the proposed Lighthouse Wind project is the Iroquois National Wildlife Refuge, Tonawanda and Oak Orchard Wildlife Management Areas. This L shaped complex is marked by cross

hatching. This wildlife complex provides waterfowl and other birds an important migratory haven. When these resting waterfowl resume their migration they will head directly north into the Lighthouse Wind project and on hazy, foggy days the duck could collide with the turbines.

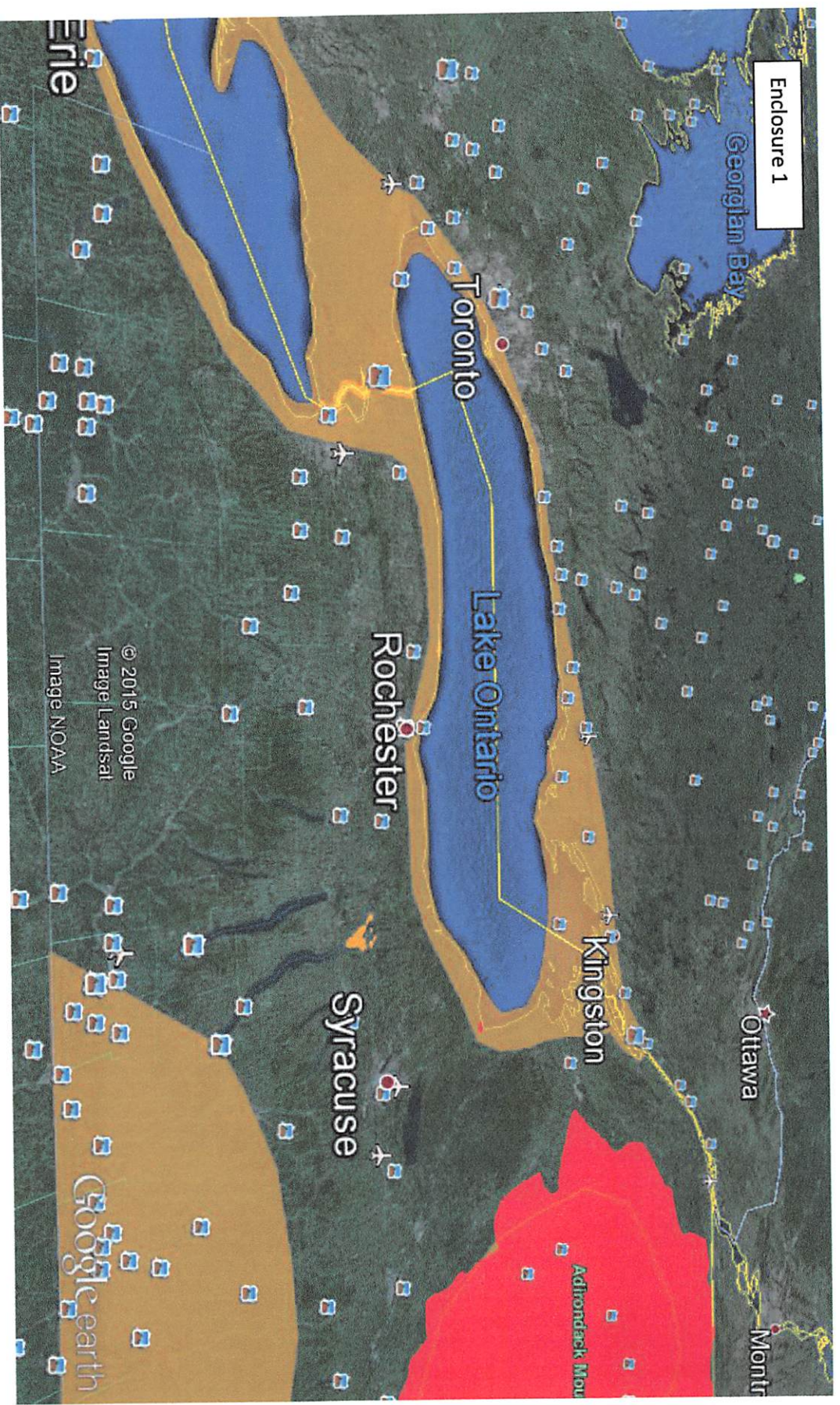
The maps and data enclosed show that the south shore of Lake Ontario is a critical migratory corridor for both raptors and other neotropical migratory birds. Therefore, it is not a suitable region for large industrial wind turbine facilities. The Lighthouse Wind or any other large scale wind turbine facility along the lake shore will put millions birds endanger of collision and death. Development of wind turbines along the south shore of Lake Ontario is ill advised, the cost in birds and wildlife will be too high for New York State.

Respectfully,

A handwritten signature in black ink that reads "June Summers". The signature is written in a cursive, flowing style.

President,  
June Summers



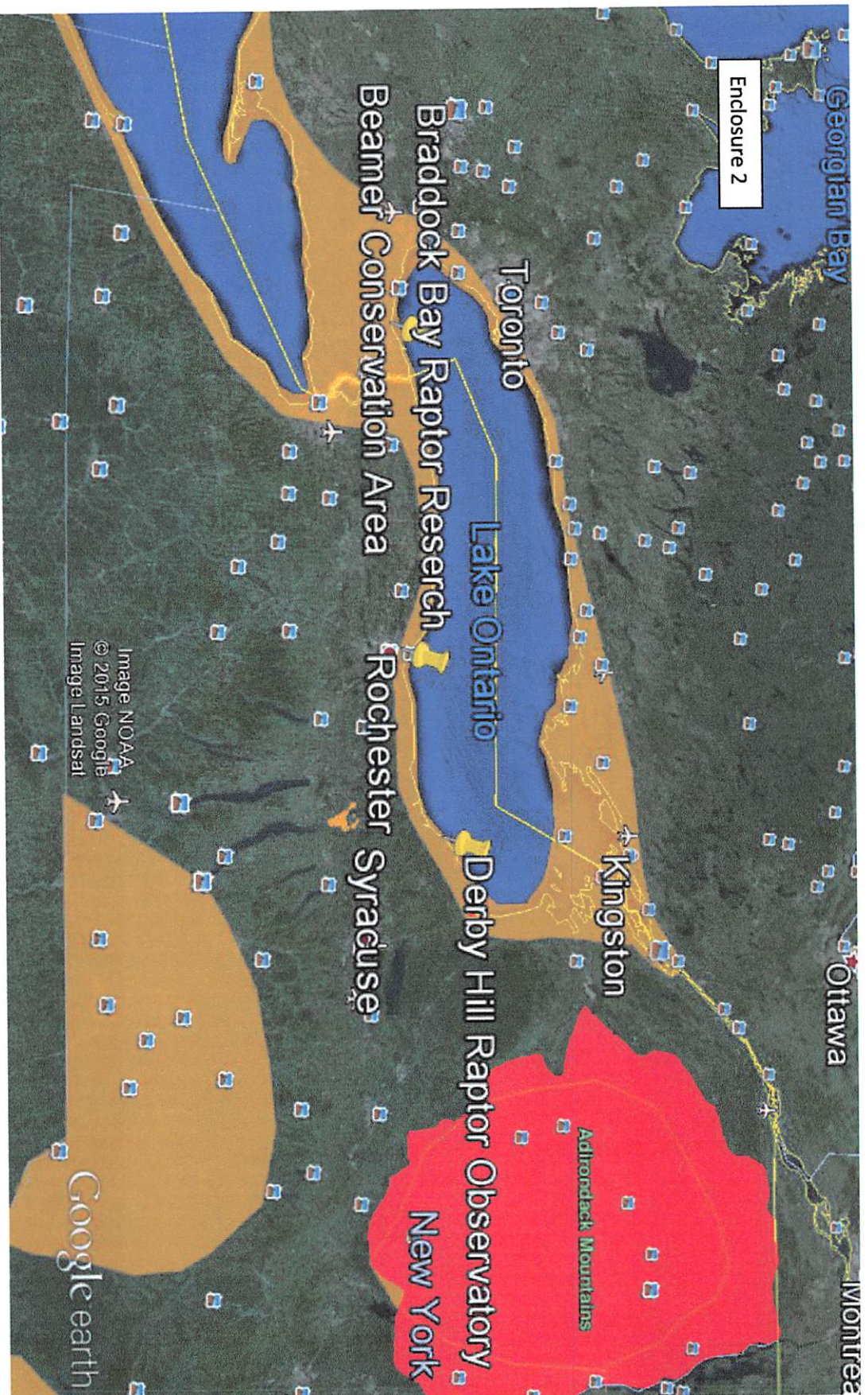


## American Bird Conservancy Wind Development Bird Risk Map

**Orange:** High Importance, Key Migration Corridors where bird risk will differ from season to season, and may also differ from year to year.

**Red:** Critical Importance, Wind power is not appropriate for any of these areas and their immediate environs.





## American Bird Conservancy Wind Development Bird Risk Map

Raptor Observatories marked; Beamer Conservation Area, Braddock Bay Raptor Research, and Derby Hill Raptor Observatory

### Enclosure 3

#### Lake Ontario South Shore Hawk Watch Facilities

	Beamer Niagara Peninsula Hawkwatch			Braddock Bay Raptor Research Hawkwatch			Derby Hill Hawkwatch		
	Total Raptors	Bald Eagle	Golden Eagles	Total Raptors	Bald Eagles	Golden Eagles	Total Raptors	Bald Eagles	Golden Eagles
2012	14,432	57	12	79,530	450	43	51,249	589	72
2013	12,209	62	8	75,520	648	25	47,417	673	60
2014	11,671	43	5	63,945	459	64	56,877	722	71



Enclosure 4

