

Siting Wind Farms and Conservation Values: the AOK Stance

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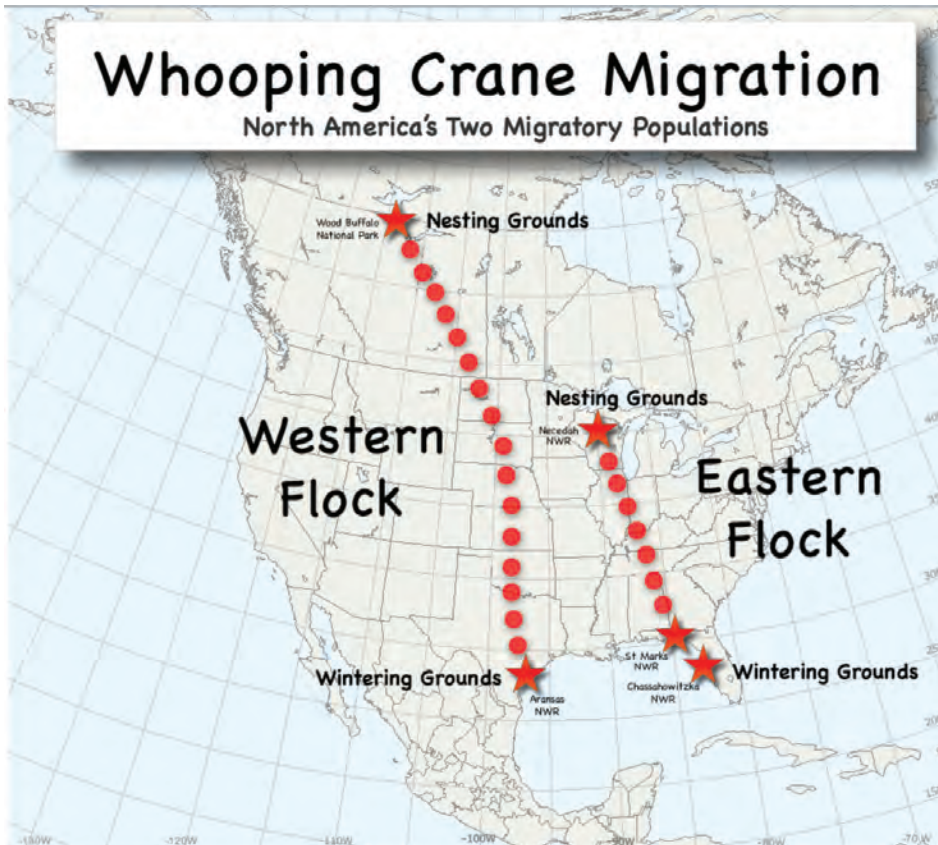
Sandhill Crane migration routes funneling through Cheyenne Bottoms and Quivira - SeeTheCranes.com

The wildlife of Kansas is not owned by any individual or any organization. It is owned by the people of Kansas and is held in trust by the State for the people of Kansas. The entity charged with guarding that trust is our Kansas Department of Wildlife, Parks, and Tourism (KDWP). In fulfillment of their obligation, KDWP has established guidelines for the protection of wildlife in the siting of wind energy conversion systems (WECS).

Currently, ultimate authority for siting decisions for WECS rests with individual counties, which can establish strict or lenient regulations or ignore regulations altogether. We in Audubon of Kansas have been urging counties to adopt our state's guidelines as siting standards that would have the force of law. Too often we have seen wind developers come into Kansas and dismiss our state's guidelines as mere "recommendations." Misplaced wind turbines put wildlife, including endangered species and threatened ecosystems, at risk. But too often wind developers are more interested in quickly claiming taxpayer subsidies than they are in substantiating their claims to being "green."

Here are the KDWP guidelines:

- 1) That wind power facilities should be sited on previously altered landscapes, such as areas of extensive cultivation or urban and industrial development, and outside of the "Tallgrass Heartland" wind moratorium, avoiding as well other areas of large intact native prairie, important wildlife migration corridors, and migration staging areas.
- (2) That projects should adhere to the Siting Guidelines for Windpower Projects in Kansas, produced by the Kansas Renewable Energy Working Group³, or the U.S. Fish and Wildlife Service's Land Based Wind Energy Guidelines⁴.
- (3) That the study and establishment of standards for adequate inventory of plant and animal communities is conducted before wind development site selection, during construction, and after development is completed. The resultant improvement in available knowledge of wind power and wildlife interactions obtained through research and monitoring should be used to periodically update guidelines regarding the siting of wind power facilities.
- (4) That the Department recommends avoidance of native prairie and other crucial habitats as opposed to compensatory offsite mitigation.
- (5) That mitigation is appropriate if significant ecological harm from wind power facilities cannot be adequately addressed through proper siting and avoidance of crucial habitats. The Department requests that, when possible, project developers utilize established mitigation programs to offset unavoidable impacts (examples include established conservation banks and the WAFWA Range Wide Plan for Lesser Prairie-Chicken Conservation).
- (6) That the Department manages public wildlife areas to optimize habitat for native wildlife species, especially game species and migratory birds. This work tends to concentrate wildlife in those areas. To avoid adverse impacts to those species and the users of the wildlife areas, the Department recommends that turbines not be sited within three (3) miles of a KDWP-managed property.
- (7) That Environmental Reviews, which investigate possible impacts to native wildlife and habitats, should be conducted by Department staff to assist in the determination of possible adverse impacts to wildlife and support the establishment of processes to ensure a comprehensive and consistent method in addressing proposed wind power developments. (Retrieved from <https://ksoutdoors.com/Services/Environmental-Reviews/Wind-Power-and-Wildlife-Issues-in-Kansas/Wind-Power-Position>, May 19, 2019.)



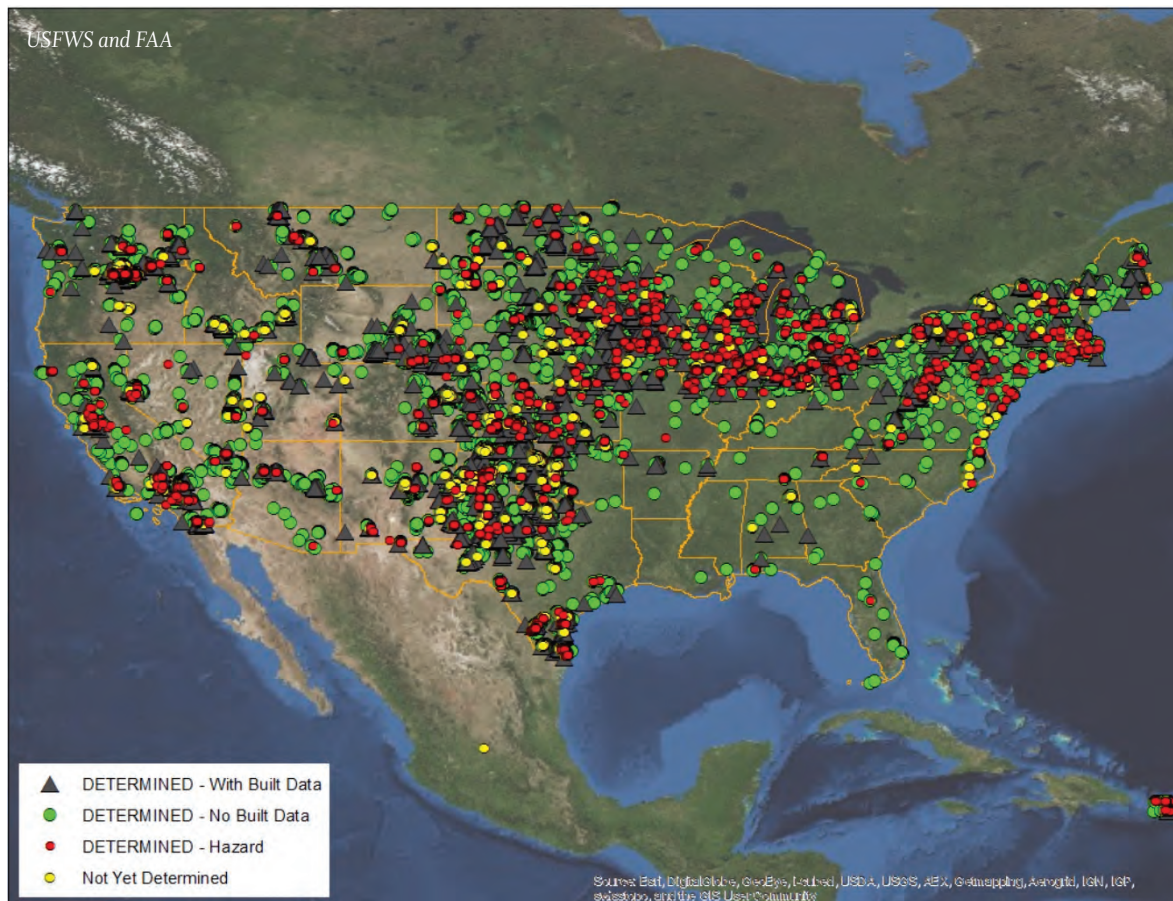
By protecting wildlife, these guidelines protect our natural heritage, the birthright of all Kansans.

But if neither the developers nor county officials take the guidelines seriously, wildlife is not protected. Wildlife advocates in three separate counties—Reno, Marion, and McPherson—have recently contacted AOK because proposed industrial wind projects threaten the environment. When we investigated, we found that the developers' proposals did indeed violate our state's guidelines. Turbines were proposed for native migration corridors, wildlife gathering spots, and locations too close to state wildlife areas, as well as for unplowed native prairie. Some eight turbines proposed for Reno County scored a quadruple whammy: simultaneously fragmenting native prairie, impacting wetlands, degrading critical habitat for threatened and endangered species, and transgressing the three-mile buffer around Cheney State Park and Cheney Lake Wildlife Area. The developer brushed KDWPPT objections aside, calling Kansas's guidelines "purely a recommendation—not a rule or a regulation." Similarly, in Marion County, the would-be developer simply refused to schedule the recommended KDWPPT site review, after KDWPPT pointed out some violations.

The developers get away with dismissing Kansas's guidelines because no law says they can't. But the rationale for the generous subsidies which taxpayers provide to WECS is that wind energy is supposed to be "green." How "green" can it be if it ignores protections for wildlife? NextEra, the developer in Reno Coun-

ty, is in line for \$12.4 million per year in federal tax credits and another \$56 million in state tax exemptions over the life of the project, if the project is approved. These numbers are typical of projects around the state. In return for all that investment, shouldn't the public receive more than environmental damage in return? (Reno County recently denied NextEra's application for a permit, following the success of a citizens' protest petition. NextEra is now suing Reno County, trying to invalidate the petition.)

The danger from misplaced "green" energy is not just a Kansas phenomenon. We in AOK are sponsoring a yearly "Celebration of Cranes" at Quivira National Wildlife Refuge. We invite people to experience the Serengeti-like wonder of the migration of hundreds of thousands of Sandhill Cranes, along with the presence of dozens of endangered Whooping Cranes that are slowly building their population up from its almost-fatal low of 15 in 1938 compared to 500 today. The accompanying maps show the migration route of Sandhills and of the band of Whoopers that come through Kansas twice a year. The cranes use the Central Flyway and share it with millions of migrating hawks, eagles, fishing birds, vultures, shorebirds, ducks, geese, and songbirds. But that very same corridor is being increasingly populated by giant industrial structures—destructively sited wind turbines. The third map, assembled by the Fish and Wildlife Service using data from the FAA, shows existing and proposed locations for industrial wind turbines. If we think about birds trying to fly through this forest of turbines—each massive blade sweeping



Locations of windfarms, built and planned, in the continental U.S., showing those that constitute hazards.

an area the size of two football fields—we can only shudder at the dangers we humans are adding to the already perilous journeys of migrating birds.

When the KDWPT guidelines are violated, it's not just wildlife that is hurt. Human, communal values are violated as well. AOK stands with people in threatened communities because:

- We value humans' love for nature. We see it as itself a natural resource—something on which a sustainable society can be built.
- We value people who see wildlife as a part of their community.
- We honor people's desire to embrace their land communities—to defend their sunrises and sunsets, their night skies, their feathered and furry neighbors.

We should not be swayed by slogans, no matter how “green” they sound.

Our touchstones should be real birds, real wildlife, real migration corridors, real habitat, real communities, and real people who cherish the natural world.