



Friends of the St. Joe River Association, Inc.

P.O. Box 1794
South Bend, Indiana 46634
www.fotsjr.org

Established 1994
501(c)(3) Not-for-Profit

May 3, 2019

Mr. Bud Norman, County Administrator
Branch County Planning Commission
31 Division St.
Coldwater, MI 49036

Dear Mr. Norman:

The Friends of the St. Joe River Association, Inc. (FotSJR) brings together stakeholders throughout the watershed in an effort to protect and restore the river as a critical component of the Lake Michigan Basin. Activities that improve water quality, protect natural resources, and further environmental education in the watershed are important to this effort. I am contacting you today on behalf of FotSJR in support of a collaborative effort to protect, restore and foster stewardship within the St. Joseph River Watershed. It has been brought to our attention that a private entity is looking to install a series of Industrial Wind Turbines (IWT's) in your township within the St. Joseph River Watershed.

The FotSJR supports and appreciates the move to more renewable energy but any possible negative effects to the watershed should be considered. The U. S. Fish and Wildlife Service's (USFWS) Land-Based Wind Energy Guidelines and the Best Management Practices (BMP's) found within those guidelines provide a good starting point for protecting your township and our watershed. The FotSJR recommends all townships consider these guidelines and BMP's for IWT's when developing any associated ordinances.

Endangered and threatened species are found within most townships in the watershed, and by adopting ordinances that adhere to these USFWS guidelines and BMP's, such action will assist in the protection of these critical species. Bald eagles (*Haliaeetus leucocephalus*) are one example of endangered species that currently nest in the watershed for which the USFWS provides guidelines on the proper set back (from bald eagle nesting areas) along riparian corridors.

These guidelines, in part, from the USFWS (also see the below reference footnotes for more information) state:

“[USFWS] encourage the placement of turbines away from any large wetland, stream corridors, or wooded areas....[USFWS] recommends that

“A Bi-State Organization for Watershed-Wide Improvement & Protection”



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no turbines be located within five miles of bald eagle nests or between refuges and known feed areas for migratory water birds and waterfowl.” [Per guidance provided in 2007 to officials of Lake Township, Huron County, Michigan, by Craig A. Czarnecki, Field Supervisor (Michigan) of the USFWS.]

Like birds, bats will target riparian areas for nesting because of the exfoliating trees that provide roosting areas, which in turn are close to waters that have many emerging insects. The Indiana bat (*Myotis sodalists*) and the northern long-eared bat (*Myotis septentrionalis*), respectively, are two endangered species found within the St. Joseph River Watershed that could be vulnerable to IWTs placed within riparian corridors not in accordance with USFWS guidelines and BMP's.

The FotSJR strongly supports efforts made by individual townships to adopt ordinances that aim to protect natural resources. For the reasons stated above, the FotSJR strongly encourages your township to consider adopting ordinances that follow the USFWS guidelines and BMP's with respect to the placement of wind energy systems within or near riparian corridors within the St. Joseph River Watershed.

Sincerely,

Jeffery N. Reece
President

References:

U. S Fish and Wildlife 2012: U.S. Fish and Wildlife Service Land-Based Wind Energy Guidelines. OMB Control No, 1018-0148

Ewert, D. N., J.B. Cole, and E. Grman, 2011: Great Lakes regional guidelines. The Nature Conservancy, Lansing, Michigan

Khalil, Mona, ed., 2016, U.S. Geological Survey—Energy and Wildlife research annual report for 2016: U.S. Geological Survey Open-File Report 2016-1147, 59 p., <http://dx.doi.org/10.3133/ofr20161147>.

"A Bi-State Organization for Watershed-Wide Improvement & Protection"