

# PUBLIC SUBMISSION

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Comment from WhoPoo App

## Submitter Information

**Organization:** WhoPoo App

## General Comment

Please include wind turbine neighbors in this survey due to wind turbines proving devastating to native pollinators. wind energy has emerged as one of the greatest threats to endangered bird and bat species, as well as insect populations, around the world.

Wind Energy's War on Nature

In many countries, wind turbines pose the single greatest threat to bats after habitat loss and white-nose syndrome. In some places such as Texas, where white-nose syndrome, a deadly fungus, has only recently arrived, wind turbines are the single greatest threat to bats, which are important pollinators.

And scientists say wind turbines are the single greatest human threat to migratory bats, which live in different habitats during summer and winter months. Some, like the hoary bat, fly south to Mexico during the winter as insects become more scarce in North America.

In 2017, a team of scientists warned that the hoary bat, a migratory species, could go extinct if the expansion of wind farms continues.

"Unprecedented numbers of migratory bats are found dead beneath industrial-scale wind turbines during late summer and autumn in both North America and Europe," writes Paul Cryan, a research biologist with the US Geological Survey.

Come on, you might be thinking. Surely there are greater threats to migratory bats than wind turbines?

There aren't. "Wind energy facilities kill a significant number of bats far exceeding any documented natural or human-caused sources of mortality in the affected species," writes Cryan.

Cryan is emphatic on this point. "There are no other well-documented threats to populations of migratory tree bats that cause mortality of similar magnitude to that observed at wind turbines."

Another leading bat expert, Patricia Brown, agrees. More than a decade ago she warned California energy regulators that wind turbines could be the "nail in the coffin" for some migratory bat species.

Aren't bats protected from wind turbines by government agencies enforcing the Endangered Species Act and other conservation laws? They're not.

"None of the migratory bats known to be most affected by wind turbines are protected by conservation laws," writes Cryan, "nor is there a legal mandate driving research into the problem or implementation of potential solutions."

Wind turbines have also emerged as one of the greatest human threats to many species of large, threatened and high-conservation value birds, after habitat loss from urban development which rarely includes pollinator gardens.

Wind energy threatens golden eagles, bald eagles, burrowing owls, red-tailed hawks, Swainson's hawks, American kestrels, white-tailed kites, peregrine falcons, and prairie falcons, among many others.

The expansion of wind turbines could result in the extinction of the golden eagle in the western United States, where its population is at an unsustainably low level.

Any additional mortalities to the golden eagle threatens the species with extinction, scientists with US Fish and Wildlife warned 10 years ago, before the last decade's massive expansion of wind farms.

For decades the wind industry has put out a steady stream of grossly misleading information about its wildlife impact. It continues to claim that the impact of wind turbines is relatively low, and compares the bird deaths it causes to those of housecats, or buildings. These claims must be reined in.

#### Wind Turbines And The Insect Die-Off

The decline of insect populations may be worsening the threat to endangered bird and bat species.

"There is strong evidence that many insect populations are under serious threat and are declining in many places across the globe," notes Extinction Rebellion. "A 27-year long population monitoring study in Germany revealed a dramatic 76% decline in flying insect biomass."

What Extinction Rebellion does not mention is that scientists in Germany say wind turbines appear to be contributing significantly to what it calls the "insect die-off."

Dr. Franz Trieb of the Institute of Engineering Thermodynamics concludes that a "rough but conservative estimate of the impact of wind farms on flying insects in Germany" is a "loss of about 1.2 trillion insects of different species per year" which "could be relevant for population stability."

The German wind insect death toll is an astonishing one-third of the total annual insect migration in southern England, a comparison that the scientists say "shows that losses of a trillion per year certainly have a relevant order of magnitude."

Because insects migrate, the impact of German wind farms is "not limited to local populations, but includes species like the Ladybird beetle (*C. septempunctata*) and the Painted Lady butterfly (*V. cardui*) that travel hundreds and even thousands of kilometers through Europe and Africa." Insects, birds, bats, and wind farm developers are all attracted to the same thing.