

## Lies for profits

*[“Eagles hold a revered place](#) in our nation’s history and culture, particularly that of Native Americans,” said Service Director Dan Ashe. “The proposed regulations provide a path forward for maintaining stable or increasing eagle populations while also ensuring that limited and incidental take of eagles that occurs as a result of otherwise legal activity is tracked, permitted and, where possible, reduced.”*

*“For decades, the Service has demonstrated leadership and commitment to the conservation of bald and golden eagles,” said Ashe. “This rule recognizes the need to adapt eagle management to changes across the American landscape, including our own activities.”*

# Leviathan lies for profit

A brief analysis of comments to Proposed Rule regarding Eagle Permits; Revisions to USFWS Regulations for Eagle Incidental Take and Take of Eagle Nests: July 2016

*By Sherri Lange*



Comments to the USFWS were voluminous. At hand: public comment on a plan for increased “mitigation” and oversight, and permitting for 30 years for eagle takes by industrial wind projects, that is, kills, and reduction and loss of habitat, as necessary to the job of fixing the now debunked anthropogenic climate change views.

The comments are from ordinary citizens, bird lovers, and the well-funded bird groups and environmental lobbies, Sierra Chapters, ABC (American Bird Conservancy), Wetlands Groups, HMANA (Hawk Migration Association of North America), Audubon, as well as knowledgeable non paid experts such as Wiegand and Duchamp. Here is a closer look at some of the comments; some are obsequious and flattering to the FWS “noise”, in favor of mutually advantageous funding arrangements, given as some say, the inevitability of the program, and in cases mainstay federal funding of millions, billions, on the backs of collateral bird and wildlife losses. Others are refreshingly without euphemistic color or ulterior motives.

## Quick review:

Purporting to “protect eagle populations,” the FWS increases its double speak:

*“The proposed rule sets objectives for eagle management, addresses how populations will be monitored and managed, directs how data on permitted eagle mortality are obtained and used, and provides a framework for how the incidental take permitting system fits within the overall framework of eagle management.”*

*The proposed regulations address the duration of permits for incidental take of eagles, extending the maximum permit duration to 30 years, subject to a recurring five-year review process throughout the permit life. Under the proposed revisions, only applicants who commit to adaptive management measures to ensure the preservation of eagles will be considered for permits with terms longer than five years.”*

Note the use of a five year review process, “dependent on funding,” “adaptive management measures commitments” controlled by developers, and the concepts of, “incidental” take, and “eagle management.” The

subtext is the reality of developers' controlling mortality counts, hoped for increased cooperation, as they could minimize fines and jail time, for a longer period of time. The result yet would be death and destruction of nests and habitat, while working with FWS to "preserve" eagles. *Double speak is a funny thing: deliberately euphemistic, disingenuous, garbled, and often offensively ambiguous.*

## Who said what

### HMANA Hawk Migration Association of America

*"The Hawk Migration Association of North America (HMANA) opposes the extension of incidental eagle-take permit life-spans from five years to thirty years. Understanding, however, that the proposed rule change may have some conservation benefits and is likely to be implemented, HMANA urges that with implementation careful and rigorous attention be paid to the five-year compliance reviews associated with the permits as well as to the mandatory pre-construction studies, post-construction mortality monitoring and periodic continent-wide population assessments."*

*Real speak: We oppose the 30 year incidental take, BUT it is likely to be implemented, and may have some conservation benefits. So we urge that rigorous attention be paid to the five year reviews associated with the permits and pre and post construction mortality studies, done by the developers.*

*Would this be the same rigorous attention to the massive deaths now occurring, where routine cover-ups and insincere monitoring are regular as the sun? The letter goes on to say that much is ambiguous and unclear: difficult to support a conservation strategy that allows a take of 4200 bald eagles annually, a significant increase, and difficult for us to imagine that as suggested by HMANA that the developer will become "more compliant and "cooperative."*

*USEFUL POINT: the monitoring is contingent on appropriate funding.*

**MARK: D**

## ABC American Bird Conservancy

*“ABC supports the development of clean, renewable sources of energy such as wind and solar power to address anthropogenic climate change, but also believes that it must be done responsibly and with minimal impact on our public trust resources, including ecologically important native species of birds and bats, and particularly Threatened, Endangered and other protected species.”*

*Real speak: We still need this useless non performing industry, and accept that damage, kills, can be done responsibly and with minimal impact. This has not borne out, and this particular endeavor by FWS is in reality an attempt to facilitate more wind, not to curtail its pecuniary adventures.*

### *USEFUL POINTS:*

*“Thus, when wind turbines are sited in areas with large concentrations of eagles, take can be expected to occur, and the distinction between “non-purposeful” or “incidental” and “purposeful” take becomes meaningless, as a practical as well as a legal matter. Indeed, the Bald and Golden Eagle Protection Act (BGEPA) imposes serious criminal penalties on any conduct that involves a “knowing” “take” of Bald or Golden eagles without a FWS permit, as well as conduct that is pursued with “wanton disregard for the consequences” of the action. (16 U.S.C. § 668(a)). Thus, the change in the proposed rule from “non-purposeful” take permits to “incidental” take permits accomplishes nothing of substance with respect to the protection of eagles.” Acknowledging “development facilitation,” ABC, however, also states:*

*‘A dispassionate observer might be forgiven for concluding that FWS’s new proposal, which never even acknowledges the rationale for its earlier 30-year rule, is still designed actually to accommodate the wind energy industry, rather than to protect eagles.’*

- *Reminds FWS that it has the mandate to enforce rules.*
- *Theoretical models of sustainable populations.*

- *Generic unsupportable assertions.*
- *“FWS recognizes that: “Golden Eagle populations in the United States may not be able to sustain any additional, unmitigated mortality and the threshold for this species is zero.”*
- *“....every pre-construction risk assessment for wind projects we have reviewed downplays the projected impacts on wildlife. The consultant is being paid to reach that conclusion, Indeed, a consultant who failed even once to conclude in favor of the wind project over wildlife would not be in business for long.”*
- *“(The public) {is} not going to tolerate large numbers of iconic eagles killed by poorly-sited wind energy and other projects.”*
- *Few, if any, reliable sources of mitigation.*
- *“While the FWS argues that this revised Eagle Take Rule is science-based, in reality, it can perhaps be more accurately characterized as a huge experiment with our public trust resources at risk. Neither the proposed rule, nor the DEIS, presents any evidence that effective mitigation measures exist that can even begin to offset the thousands of authorized eagle deaths contemplated by the rule.”*
- *“ABC urges more consistent enforcement of existing wildlife protection laws, including ESA, BGEPA and MBTA. ABC recommends that wind energy companies be informed a priori what the consequences would be if mortality at their facilities regularly exceeds the limits established by FWS. Those consequences should be fines, additional (proven) mitigation requirements, prosecution, and eventually curtailment or even permanent facility shut down if the problem cannot be successfully addressed.”*
- *“Industry self-reporting is a direct conflict of interest.”*
- *“Additionally, the Proposed Rule’s focus on meeting the needs of the wind energy industry is inappropriate considering that wind energy developers produce only 1.9 percent of all the energy consumed in the United States (and only 4.7 percent of all electricity generated in the United States).”  
Amen.*

*COMMITMENT TO “RENEWABLES” COMMENT SHADOWS THE BRILLIANT POINT BY POINT DISCUSSION: there is no such thing as renewable energy, and no reason whatsoever to even argue about how and when and where to displace and kill on its behalf. Step up and just say it, ABC. All wind energy is bird dumb, and will never be bird smart, despite the cute lingo.*

**MARK: C**

## **AUDUBON**

*“Groups like Audubon support properly sited renewable wind power, but when done in a way that minimizes harm to birds and other wildlife. “We can protect America’s birds and transition away from fossil fuels at the same time,” said Mike Daulton, Audubon’s vice president of policy and strategy, in a statement. “Clean energy does not need to come at the expense of protected Bald and Golden eagle species.”*

### ***More DOUBLE-SPEAK.***

*“What Audubon wants is a stronger plan, one that incorporates scientifically proven methods to achieve what George calls “avoidance, minimization, and compensatory mitigation,” technical terminology for what essentially means assessing a project’s risk to local eagles, changing course if necessary, and coming up with solutions to decrease and offset deaths that do happen.”*

*“Audubon has long worked with the wind industry (our emphasis) to incorporate the best technology and siting information to build wind farms that pose less risk to birds and other wildlife. We believe that new technologies and better siting must be combined with the necessary government oversight to ensure that the wind industry is taking every step possible to avoid unnecessary bird deaths.”*

***REAL SPEAK: zero deaths from wind that does not even produce enough for a few tea kettles. Net Zero, Ultimate loser. Avoidance, minimization and compensatory mitigation? How about avoiding this industry completely and giving us back***

*iconic bird life to its freest self. Self-populating, self-actualizing, self-moderating, self-sustaining. Worked WITH the industry says it all.*

**MARK: C MINUS**

## **TULSA AUDUBON**

*Deserving of full mention: all emphasis is ours*

**”KILLING THEM FOR PROFIT IS STILL KILLING THEM”**

*“Eagle take Notes: 1. The FWS model is un-tested. It is scientific, but untested. Nobody can be sure it is accurate over the next 30 years. To believe it is accurate is totally unrealistic. I know you have good people and this is the best they can do. This might, however, not be sufficient to prevent a decline in population. 2. USFWS micro-manages the various permits (Rehabilitation, religious use, education) particularly for Eagles. There are many biologists within the service that consider these (no longer wild) genetically dead and not worthy of the time and effort to regulate them. The FWS has very specific specifications for caging, training, support, acquiring, transferring etc. The regulators seem to be given the task to regulate and they do. Permitting the killing of eagles, in the proposed numbers (hundreds or thousands), is inconsistent with the way the service handles those wanting to help / save the eagles. **The FWS makes it hard to save eagles, and for a relatively small expense Wind-turbine operators are allowed to slice and dice them.** The service makes it extremely hard, if not impossible, to get an Eagle propagation permit, and yet you can currently kill them with impunity if you operate a wind turbine farm. Altamont Pass is an excellent example. For the past 35 years an estimated 75 to 110 Golden Eagles have been killed every year. Conservatively that’s over 2000 golden eagles that died, and nobody was sent to jail. After the first few, the rest were killed with **“Wanton Disregard”**. 3. Native Americans have a special interest and rights to eagles under the American Indian Religious Freedom Act. Pub. L. 95–341, § 2, Aug. 11, 1978, 92 Stat. 470, provided that the President direct the various Federal departments, agencies, and other*

*instrumentalities responsible for administering relevant laws to evaluate their policies and procedures in consultation with native traditional religious leaders to determine changes necessary to preserve Native American religious cultural rights and practices and report to the Congress 12 months after Aug. 11, 1978 Permitting the killing of eagles violates the intent of this act, and killing Eagles offends many Native Americans. Non-Native Americans can't have a single feather, and falconers can no longer get Eagles because they are not Native American. To some Native Americans the Eagle is the messenger to the creator. To others the smoke of an eagle feather carries a message to the creator. The Eagle is father of Lakota people. This may sound extreme, but it is as if the US government gave permits to kill Catholic Bishops. 4. **FWS states this is an "unintended consequence of an otherwise legal activity". I call it "Reckless Disregard" or "Wanton disregard" for our National symbol and a sacred icon for most Native Americans.** If you fired a shotgun in a crowded auditorium, everyone would say that is wrong and against the law. You wouldn't have to want to kill anyone, but everyone would say injuring someone was foreseeable and reckless. This is the same for eagles and wind turbines, but FW wants to change the law to make it OK. 5. BAGEPA, 16 USC 668-668d, SUBCHAPTER II (a) Prohibited acts; criminal penalties **Whoever, within the United States or any place subject to the jurisdiction thereof, without being permitted to do so as provided in this subchapter, shall knowingly, or with wanton disregard for the consequences of his act take, possess, sell, purchase, barter, offer to sell, purchase or barter, transport, export or import, at any time or in any manner any bald eagle commonly known as the American eagle or any golden eagle, alive or dead. This should remain unchanged, with no exemptions for wind-turbines.** 6. Providing a larger number of Eagle Kill (Take) permits and increasing them to 30 years will, most assuredly, reduce the industry incentive to come up with new designs to reduce bird strikes. It drives the wrong behavior. 7. Insanity: "Doing the same thing over and over again and expecting different results." Albert Einstein Erecting wind-turbines*



that are known to kill birds and bats seems the same to me. 8. **A very large number of American citizens would not like to see the national symbol killed for profit.** 9. Many Wind farms are deliberately located in Flyways and migratory paths, which maximizes the carnage. Birds predated wind-farms and they use these prevailing winds. The Central flyway has a large number of Windfarms and thus will kill large numbers of migrating birds, including eagles. Large number of Eagles use the central flyway on their path to winter South and travel back North in the spring to breed. 10. First WE killed eagles with DDT, and now it will be wind turbines. Can't we just leave them alone and protect them? **Killing them for profit is still killing them.** 11. Contrary to popular belief, they aren't building wind farms for renewable or green energy, they are using that to SELL their program. They are building them to make a PROFIT. In this case too many people are putting this ahead of the lives of tens of thousands of birds and bats and thousands of eagles. Some say green energy is a feel-good thing. The eagles aren't feeling good when they are chopped up, and neither am I. The Wind turbine folks don't care, they want money! 12. Who is asking for this? It is not the general population, it's the "For Profit" Wind farm companies. If there was no profit in this, nobody would what to do it. Wind farms are marginal without tax breaks. Should the FWS pander to industry or error on the side of the Eagle? 13. Today if you kill an eagle on purpose it's against the law. Repeatedly doing it can cost you as much as \$250,000 an eagle. Why does this not apply to ALL wind turbine Takes? The eagles are just as dead. 14. Eagle Nest takes should not be changed. The Service published a final rule in the FR establishing two new permit regulations under the Eagle Act. One regulation gives us the ability to authorize take (removal, relocation, or destruction) of eagle nests under limited circumstances (50 CFR 22.27). The other regulation gives us the ability to authorize non-purposeful take of eagles when the taking is associated with, but not the purpose of, an otherwise lawful activity (50 CFR 22.26). These regulations provide for standard permits, which authorize individual instances of take that cannot practicably be avoided, and programmatic permits, which authorize recurring take that is unavoidable even after implementation of advanced conservation practices. On April 13, 2012, the Service published in the FR two additional rulemakings: (1) an Advance

*Notice of Proposed Rulemaking (ANPR) soliciting input on all aspects of the eagle non-purposeful take regulations and (2) a proposed rule ("Duration Rule") to extend the maximum permit tenure for programmatic eagle non-purposeful take permits from 5 to 30 years. The Duration Rule was intended to promote the responsible development of projects that will be in operation for many decades by bringing them into compliance with statutory mandates protecting eagles. Both bald and golden eagles are protected under the Eagle Act, Migratory Bird Treaty Act and the Lacey Act."*

## ***MARK: A***

### ***DELMARVA ORNITHOLOGICAL SOCIETY, Washington***

- *"30 years is simply too long a period to permit anyone to kill a fixed number of eagles"*
- *"A clear adaptive management review process and criteria for modifying take permit requirements as necessary in alignment with changes in population dynamics and status reviews"*

***REAL SPEAK: While making excellent points, for more clarity needed, we note a missing link: Zero threshold for kill process and facilitation of a non performing industry.***

## ***MARK: D***

***Shawn Smallwood: Expert on biological impacts of wind power, CA (our emphasis is added)***

*“I collaborate with colleagues worldwide on the underlying science and policy issues related to renewable energy impacts on wildlife. Most of my wind energy work has been in the APWRA (Altamont Pass Wind Resource Area), which is where much of the research funding has been directed to understanding factors related to wind turbine collisions and to finding solutions.”*

*“I have manipulated livestock grazing as a mitigation measure, and I have participated with mitigation involving power pole retrofits, hazardous turbine removals, winter shutdowns of wind turbines, and repowering of wind projects based on careful siting. I have personally discovered too many golden eagle fatalities and one bald eagle fatality in the APWRA, including mortally wounded eagles that were later euthanized. I personally witnessed hundreds of near misses between golden eagles and wind turbines, transmission lines and electric distribution lines in the APWRA.”*

*“I then worked with multiple wind companies to carefully site their turbines (Smallwood and Neher 2016, Smallwood et al. 2016), the first phase of which has reduced golden eagle fatalities by 75% to 82%, based on a before-after, control-impact comparison of fatalities following 6 years of prerepowering and 3 years of post-repowering monitoring (Brown et al. 2016). This reduction was conservative because the before and control treatment groups included fatality reductions achieved through hazardous turbine removals that took place earlier in 2008-2010. The true fatality reduction achieved at the Vasco Winds Energy Project was more likely >90%, **saving about 30 golden eagles per year from wind turbine collisions.** Not only did we accomplish this level of mitigation without the help of the USFWS, **but the \$2.3 million mitigation fund supported the protection of golden eagle habitat as well as research since 2012 that is intended to improve our understanding of golden eagle collisions with wind turbines and how to reduce impacts.**”*

*“Careful macro- (project level) and micro-siting (wind turbine level) are the obvious first and most effective steps that can be taken to minimize eagle collisions. Another obvious step is for wind companies to contribute up-front to a larger research program to identify and mitigate factors leading to collisions. This larger research can inform and test curtailment strategies, for example. Finally, the compensatory mitigation ought to be paid following several years of fatality*

*monitoring so that the wind company, the USFWS and the public understand the level of unavoidable take.”*

*Smallwood points to various failures of mitigation measures.*

*“...if the USFWS is going to authorize the takings of our nation’s top predators for kilowatt-hours, then it needs to more clearly define golden eagle populations so that levels of take are consistently measured.”*

*“Before proceeding with a take permit process, I recommend either strengthening the biological foundation of eagle demographic organization as a basis for assessing wind energy impacts, or taking another approach altogether.”*

*“In my experience, most often a species will breed within about 25% of its available habitat at any given time, and these centers of activity will shift every few years.”*

*At a Washington, DC meeting, “We suggested that regulators ask the following questions about conclusions of biological significance, “Significant to what? Within what geographic area? Over what timeframe?” In other words, the impacts assessment is far better addressed in a rigorous manner prior to the development of a wind project rather than afterwards.”*

*“Golden eagles in the APWRA are almost always engaged in social drama, with younger eagles following older eagles, or younger eagles leaving an area upon the approach of an older eagle, or of eagles courting each other or of eagles diving on each other (too often near a wind turbine) and eagles cuing on each other’s foraging activities and prey capture. Killing an eagle is more than just killing an eagle.”*

*“The Proposed Rule says that adaptive management will be used to identify mitigation measures to minimize, reduce or offset wind energy impacts on eagles. This promise implies that effective measures are available. **Other than careful siting to minimize impacts, no such measures are available, even after years of efforts to 11 propose and test measures.”***

*“Given these types of variation (documented at the Tres Vaqueros site), and given that more golden eagles have been documented as wind turbine fatalities than throughout all of the rest of the wind projects*

*across the USA combined, thereby qualifying the APWRA as the most obvious place to examine use and fatality data, why would the USFWS believe that use rates would predict fatality rates?”*

*REAL SPEAK: Brilliance at assessments of biological impacts and failures of mitigation and fatality data is overshadowed by the fact that the industry is an abject failure, closed to disclosure, performing its own mortality studies, obfuscating those data, and that this expert works “with” the industry. The knowledge of this expert could transform into genuine condemnation of the killing fields: it has not.*

**MARK: D**

### *Mark Duchamp: Save the Eagles International*

*Save the Eagles International is firmly opposed to the issue of take permits for golden eagles and bald eagles. We have commented on this on prior occasions, and published our comments here:*

*<http://savetheeaglesinternational.org/submissions/submission-to-usfws-2014.html>*

*By the way, it takes a very naive American to believe that windfarm companies will report accurately the number of eagles they kill. Thus, the take permits will become de facto licenses to kill unlimited numbers of eagles.*

*We take this opportunity to draw your attention to our submission to the Australian Senate, which we have published as an article here:*

*<http://savetheeaglesinternational.org/submissions/covering-up-the-massacre-2.html>*

*Mark Duchamp  
President, Save the Eagles International*

## **MARK: A PLUS**

*Jim Wiegand, Wildlife Biologist specializing in wind turbine impacts*

*"I have reviewed the recently completed FWS status report on bald and golden eagles: "Bald and Golden Eagles: Status, trends, and estimation of sustainable take rates in the United States and the associated DPEIS for the proposed rule. Golden eagle populations are far from being stable nor are they increasing.*

*My comments provided in the attached file prove both of these reports are filled with methodology bias, filtered and highly flawed non-scientific information rendering these false reports useless in determining any Action on the proposed rule. **In fact these two reports are a complete fabrication created for the benefit of the wind industry.***

*It defies all logic and moral conduct that enough cheap energy is being exported from the US that could produce triple the energy production from all of America's eagle killing wind turbines, while dirt bags hiding behind fraudulent research are peddling these worthless turbines to Americans.*

*I have integrated and provided links with these comments. The information found at these links are to be included as part of my comments." [\(Please see this link](#) for full documents provided to FWS.)*

## **MARK: A PLUS**

## *Citizen Anonymous* ([from various submissions](#))

*“Please do not allow the culling of these magnificent animals that were once endangered and now have come back to sustainable numbers. These birds are an important part of the fauna and it is inhumane to kill them due to human development. We can't kill birds just to make things easier for us humans we need to respect and preserve nature. This is not the ethical way to handle the situation.”*

## *Second Citizen Anonymous*

*“I am appalled that you want to allow more eagles to be killed by wind farm companies. Our national bird is one of the most majestic animals and I am totally opposed to more of them being killed. What gives you the right to selectively allow certain groups to kill them with no repercussions? Ordinary citizens are never allowed to do anything to harm or harass an eagle, and yet you propose letting these companies not only continue killing eagles, but you want to allow them to increase their allowed quota of kills. I don't believe I've ever been so disappointed in my government. I urge you to refuse to allow these eagle deaths and keep as many of these wonderful birds soaring through our spacious skies as possible.”*

## *Third Citizen Anonymous*

*“The Bald Eagle should be treated as sacrosanct. To allow permits to take their nests or even to remotely allow for their killing for any length of time is a tragedy. This is not just a focus on what humans want, we fail to consider the intrusions upon the Eagles habitat, lives and their ability to live their lives on their own terms. To make their lives subject to human whim for any profit or recreation will result in greater tragedies, losses of these magnificent creatures and will ensure that we create the emptiness that conservationists fear most and which will have a long-term devastating effect on our wildlife balance as a whole. I unequivocally oppose opening permits particularly as they will ensure harm will be done in the name of recreational hunting.”*

## *Fourth Citizen Anonymous*

*“I have been a raptor rehabber for 26 years and have had to renew my license to save raptors, including eagles every 2-5 years. I don't have a 30 year permit to save eagles, yet you want to give permits to kill eagles for 30 years.*

*These wind turbine operators are "For Profit" enterprises. Providing a larger number of Eagle Kill (Take) permits and increasing them to 30 years will, most certainly, decrease the wind turbine industries motivation to come up with updated wind turbine designs that would reduce bird strikes. The 30 year take permit drives the wrong behavior. Can you think of all the changes in technology over the past 30 years, from car electronics, to TV's, to Computers, to Cell phones, to electric cars? If the wind-energy people are properly motivated there should be dramatic improvements over the upcoming years. There may be other energy advancements such as nuclear fusion as well. USFWS states this (eagle deaths from wind turbines) is an "unintended consequence of an otherwise legal activity". It is however actually "Reckless Disregard" or "Wanton disregard", as in Bald and Golden Eagle Protection Act, 16 USC 668-668d, SUBCHAPTER II (a). There is no way anyone can state the resultant eagle mortality is unanticipated. They want us to turn and look the other way while eagles are being sliced-and-diced so they can make a profit. The US Attorney General states on 12-Oct-2012: "The Department of Justice recognizes that many Indian tribes and tribal members use, and traditionally have used, federally protected birds, bird feathers, or other bird parts for their tribal cultural and religious expression... protecting the ability of their members to meaningfully practice their religions and preserve their cultures". Most Native Americans find hacking up eagles repulsive. This is the national symbol for Americans and a prominent religious and cultural icon for virtually all Native Americans. First you take their land then you permit killing Eagles. **Where do the insults stop? Have you had real in person tribal consultation with every tribe? Have you asked them if killing eagles is OK with them?"***

## *Fifth Citizen Anonymous*

*“The killing must stop. Stop using my tax dollars to fund more killing!”*



## *Sixth Citizen Anonymous*

*“Protect the country's symbol; don't destroy it. What are you thinking? The Eagle was endangered a few years ago and now you want to kill more of them. Don't you have anything better to do? This is just another Federal Government insensitive display of political BS. Protect what is natural don't destroy it. If you want to shoot something I suggest ISIL.”*

### **MARKS: A PLUS**

## DRILLING DOWN

*There are a total of 1,835 comments. This review is by means of a sample survey. Our comment:*

*Building a legal framework to augment and facilitate industrial wind Eagle killing fields, is beyond logic. The creation of complex financial infrastructures to continue exploitation of wildlife, and the build-out of euphemistic double speak language in the work of this agenda to promote non-performing wind, is ugly, demeaning, and against American values. There is no such thing as a bird friendly turbine installation; no such thing as proper siting; no such thing as mitigation. It is merely Leviathan obfuscation for profit.*

# RESOURCES

<http://www.hmana.org/hmana-comments-on-usfws-eagle-take-permit-revisions/>

<https://www.fws.gov/mountain-prairie/wind/ChokecherrySierraMadre/index.php>

<https://abcbirds.org/wp-content/uploads/2016/06/Comment-on-Revised-Eagle-Rule-Final-on-Letterhead1.pdf>

<http://audubonva.org/advocacy-issues-list/2016/5/29/help-protect-bald-eagles>

<http://www.steptoec.com/publications-9590.html>

<https://www.fws.gov/migratorybirds/pdf/management/EagleRuleRevisions-ProposedRule.pdf>

<http://www.politico.com/magazine/story/2013/12/bald-eagles-audubon-wind-power-101167#ixzz4E8MRMx1O>

<http://www.tulsaaudubon.org/eagle-take-notes-c.pdf>

[https://www.fws.gov/news/ShowNews.cfm?ref=new-science-provides-foundation-for--proposed-changes-to-service%E2%80%99s-&\\_ID=35640](https://www.fws.gov/news/ShowNews.cfm?ref=new-science-provides-foundation-for--proposed-changes-to-service%E2%80%99s-&_ID=35640)

<https://www.masterresource.org/cuisinarts-of-the-air/wind-avian-mortality-ii/>