

Docket number 06-OII-1; "Developing Statewide Avian Guidelines"

Comments on the California draft *Statewide Guidelines for Reducing Impacts to Birds and Bats from Wind Energy Development (Guidelines)*

What are the consequences of not following the voluntary guidelines?

How are equity issues to be addressed between existing wind farms and new or repowered wind farms, that may use these guidelines (both from an environmental and economic impact perspective)?

What happens if agency staff are not available, or don't feel they have expertise, to participate in SAC?

Did CEC/CDFG seek input from developers to ensure timelines and sequencing of activities are reasonable (Chp 1 – Preliminary Screening)

p. 3 – suggestion that data from adjacent wind farms should be used. What if it doesn't exist (ie no post construction monitoring has been conducted), what exists was not collected/analyzed using defensible methodologies, or is considered proprietary?

p. 6 – what does 'chronic nature' of wind energy impacts mean? Could habituation occur? Could impacts be negligible due to the site characteristics/species utilization/risk?

p. 6 – does 'throughout life of the project' mean 20 – 30 years, or longer if repowered?

p. 11 – determination of bat presence pre construction may not necessarily help predict potential bat impacts if bats are attracted to wind turbines (ie although didn't appear to be present preconstruction, use wind farm after construction)

p. 27 – last paragraph – has there been recent work in Altamont (conducted by WEST) to tested some of these associations (ie guidelines can be updated based on these recent results?)

p. 28 – Lighting impacts – any need to update based on recent FAA guidelines release (2/07)?

p. 29 – risk assessment is evaluated 'relative to other projects' – is also determined relative to the proposed project (ie high, med, low)?

p. 33 – last section – should be consistent with FAA guidelines (and provide citation)?

p. 36 – Operations... section – what authority makes the decision to modify operational plans of facility and how is enforcement ensured (and consequences of non-compliance)?

p. 39 – last paragraph – For all proposed projects... - no size thresholds?

p. 42 – Conducting Searches – last sentence – searching of 'one large turbine can take from one hour to several hours'. This seems long – has this been verified with sources of recent field work? If that's the case, within a 150MW plant, using 1.5MW turbines, only 8 turbines (ie less than 10%) could be searched by a field researcher in a day, allowing time to travel between turbines, for lunch break, bathroom breaks, over a 10-hr day.

p. 43 – top of page – 'Any injured bird...considered a fatality.' - Is this standard protocol?

p. 43 – Frequency of Carcass Searches – first sentence – would frequency also depend on budget?

p. 45 – top of page – what about low fatality areas? Finding one or more carcasses may automatically 'tip' searches that they are being tested. How do you adjust for 'tip offs' in the searcher efficiency factor?