

**DOCKET**  
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**From:** "Heather" <heatherj@calweb.com>  
**To:** <docket@energy.state.ca.us>  
**Date:** 2/16/2007 3:44:30 PM  
**Subject:** Docket No. 06-OII-1 comment letter on California Energy Commission wind energy guidelines

California Energy Commission  
Dockets Office, MS-4  
Re: Docket No. 06-OII-1  
1516 Ninth Street  
Sacramento, CA 95814-5512

Re: Draft "Statewide Guidelines for Reducing Impacts to Birds and Bats from Wind Energy Development" December 2006

Dear Commissioners:

I am writing to comment on the Statewide Guidelines for Reducing Impacts to Birds and Bats from Wind Energy Development (Draft Guidelines). The Draft Guidelines are comprehensive and recommend methods for producing comparable data not only within California but among regions of North America. I offer the following comments on a few areas that need additional detail, clarification or stronger recommendations.

**Sample Points within a study.** The number of acoustic monitoring devices to adequately survey bat use should be specified along with bird use counts (BUC). We recommend the number of acoustic monitoring devices required to describe spatial patterns of bat activity within the site equal the densities of BUC areas: 1 per turbine in small projects, 40% in medium projects, and 30% in large projects (p. 14).

**Pre-Permitting Surveys.** To account for year to year variation in bat use we recommend a minimum of two years of pre-permitting surveys (p. 39), per the recommendations in the wind energy guideline documents developed by the Alberta Bat Action Team and California Bat Working Group.

**Operations Monitoring After 2 Years.** We recommend that every facility conduct periodic (e.g., every 5 years) operations monitoring to verify that impacts continue to be within a range expected after 2 years of monitoring. For facilities where impacts are considered high after 2 years, annual monitoring is likely necessary.

**Environmental Co-Variates.** The Draft Guidelines emphasize collection of bat and bird activity and mortality levels while de-emphasizing the collection of environmental or other potentially explanatory variables.

The section on operations monitoring suggests that analyses evaluate correlations between mortality and environmental and turbine characteristics (p. 47). The Draft Guidelines should emphasize the importance of these covariates throughout and recommend their regular collection at each project.

Thank you for this opportunity.

Sincerely,  
Heather L. Johnson  
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