

STATE OF CALIFORNIA
ENERGY RESOURCES CONSERVATION
AND DEVELOPMENT COMMISSION

DOCKET 06-OII-1
DATE AUG 22 2007
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Development of Statewide Guidelines for) Docket No. 06-OII-1
Reducing Wildlife Impacts from Wind) Developing Statewide
Energy Development) Avian Guidelines

**COMMENTS OF INVENERGY WIND NORTH AMERICA
ON JULY 2007 COMMITTEE DRAFT GUIDELINES**

Invenergy Wind North America LLC (IWNA) wishes to provide these brief comments on the July 2007 Committee Draft report, "California Guidelines for Reducing Impacts to Birds and Bats from Wind Energy Development" ("Committee Draft"). IWNA is actively involved in the development of wind energy projects in California and would be directly affected by these Guidelines. For the reasons stated in the August 22, 2007, comments submitted by the California Wind Energy Association, of which IWNA is an active member, we oppose the Committee Draft and urge the Commission to take the time necessary to revise Committee Draft to ensure that it does not unjustifiably harm wind energy development in California.

The Committee Draft recommends practices that go well beyond current industry practices and what is required under CEQA to identify and mitigate all significant environmental impacts caused by a project development. IWNA is committed to sound environmental stewardship, but imposing excessive burdens on all wind energy projects, which are needed to reduce our dependence on fossil fuels and the associated global warming threat, is counter-productive.

Respectfully submitted,

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