

September 25, 2007

California Energy Commission
Dockets Office, MS-4
Re: Docket No. 06-011-1
1516 Ninth Street
Sacramento, CA 95814-5512

DOCKET	
06-011-1	
DATE	SEP 25 2007
RECD.	SEP 27 2007

Due to scheduling conflicts, I have not been able to attend the CEC meetings on the "California Guidelines for Reducing Impacts to Birds and Bats from Wind Energy Development". This letter is to elaborate on an important issue for the conservation of California's bat fauna. As a bat biologist, I have been involved in research on bats in California for 39 years. I am a member of the California Bat Working Group and have participated in the guidelines generated by that group for determining impacts to bats by wind turbines through pre-permitting assessment and post-construction monitoring. Several of our migratory bats species, such as western red bats (*Lasiurus blossevillii*) and hoary bats (*Lasiurus cinereus*) appear to have declined in California over the past 50 years, based on capture and acoustic data of biologists and records of bats turned into the California Department of Public Health for rabies analysis. This decline correlates with the decimation of riparian habitat and the increase in human development, especially in coastal areas. Red bats are considered by the Western Bat Working Group to be imperiled across the western United States, as well as a Species of Concern by the California Department of Fish and Game.

Ironically, these migratory bat species are those most impacted by the wind turbine development as evidenced by mortality statistics in other states. Wind turbines could be the "nail in the coffin" for these species that migrate across international boundaries----the Chiropteran equivalent of Partners in Flight. Bats have a lower reproductive potential than birds: most North American bat species have only one baby a year, and over half of those born will not live to reproduce. Red and hoary bats may have 2-3 pups in a litter, but the juvenile mortality is high and the survival is equivalent to other species that produce a single infant. Therefore, increased mortality due to wind turbine collisions will not be offset by an increase in reproductive potential.

The impact that wind turbines have on these species needs to be determined at each wind farm since geographic variability is to be expected. As has been adequately documented in the California Guidelines and the literature, bat carcasses are usually harder to locate and more readily scavenged. Searchers need to be trained and tested as to efficiency, and searches should be performed initially at close intervals of 2-3 days until a pattern of mortality is established. The burden of proof as to bat mortality at a given site is the responsibility of the wind farm operator, and should not be viewed as research. The results can be used to help predict mortality as sites are re-powered or new turbines erected, and to hopefully mitigate for impacts. As we learn the extent and the pattern of

the problem, it may help us to find ways to solve it. I am not opposed to wind energy as a clean, renewable energy source. However, I am very worried that we could selectively drive some species of California bats close to extinction if we do not recognize the risks involved.

Sincerely,

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