

CALIFORNIA BURROWING OWL CONSORTIUM
c/o 2310 San Pablo Avenue, Suite 202
Pinole, CA 94564
510-964-0394

February 23, 2004

Alameda County Board of Supervisors
1221 Oak Street, Suite 536
Oakland, CA 94612

Re: Mortality of Raptors in the Altamont Pass Wind Resource Area

Dear Members of the Alameda County Board of Supervisors:

On behalf of the California Burrowing Owl Consortium (CBOC), I am writing to express our concern about the environmental impacts associated with bird strikes in the Altamont Pass Wind Resource Area (APWRA) and efforts by the wind farm operators to control rodents.

The CBOC is a coalition of scientists, wildlife biologists, local, state and federal agency employees and citizens who are concerned about the western burrowing owl in California. The CBOC has been meeting twice a year since 1990. This group developed a survey protocol for this species and has worked with the California Department of Fish and Game on mitigation strategies. Following presentations by Shawn Smallwood at the California Burrowing Owl Symposium held in Sacramento, November 11-12, 2003 and the February 7, 2004 Consortium meeting, we agreed to express our concern about the extent of raptor mortality in the APWRA, and to urge you to require a full analysis of the environmental impacts associated with the generation of wind power in this area.

Recent research by Shawn Smallwood and others, revised to include an additional 18 months of data, and data collected from another 2,538 wind turbines, indicates that between 881 to 1300 raptors are being killed annually in this area, including:

99 to 380 burrowing owls
75 to 116 golden eagles
209 to 300 red-tailed hawks

The level of mortality noted above is particularly alarming given the absence of any mitigation to offset the impact to local or regional populations of these species.

We understand that the wind farm operators have undertaken various rodent control measures, including the use of rodenticides. While intended to reduce the number of rodents in close proximity to the wind turbines, and thereby reduce bird strike mortality, the use of rodenticides can have other far-reaching environmental impacts, including poisoning of the San Joaquin kit fox (state and federal endangered), and adverse impacts to habitat for California red-legged frogs

(federal threatened) and California tiger salamanders (candidate for federal listing). Mr. Smallwood's research incidentally, showed no reduction in bird strike mortality associated with these rodent control measures.

We are very concerned about your recent decision to renew the permits for continued operations of the wind turbines in the APWRA without additional analysis of environmental impacts or mitigation. We have asked the U.S. Fish and Wildlife Service to take action under its mandate to enforce provisions of the Migratory Bird Treaty Act (MBTA).

Sincerely,

Judy Bendix
On behalf of the California Burrowing Owl Consortium