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December 4, 2003

Mr. Andrew N. Young
Alameda County Community Development Agency
399 Ilmhurst Street
Hayward, CA 94544

Subject: Altamont Wind Turbine Repowering Projects

Dear Andy:

We understand that the Center for Biological Diversity and Californians for Renewable Energy have appealed a decision by Alameda County to approve the repowering of wind turbine facilities in the Altamont Hills of northeastern Alameda County. We also received a November 26, 2003, notice regarding a proposal to grant blanket Categorical Exemption from CEQA for a number of repowering applications in the Altamont Hills. The purpose of this letter is to provide comment on the appeal and the proposed CEQA exemption for these projects.

We support the usage of wind energy as a viable alternative to non-renewable fossil fuels so long as the individual and cumulative impacts resulting from wind energy generation are fully mitigated. Wind energy generation has, and continues to have, a significant adverse effect to raptors and other wildlife in the Altamont Hills.

The Altamont Hills are known to contain one of the densest concentrations of golden eagles and other raptor species in North America. Long-term monitoring studies conducted in this area have documented significant raptor mortality directly attributed to wind energy generation (National Wind Coordinating Committee 2001, UCSC Predatory Bird Research Group 1995). A number of improvements have been made to reduce mortality; however, impacts continue. We are concerned that the proposed repowering project will also have a significant, adverse effect upon raptors in this area. We do not believe that the proposed project provides adequate mitigation to fully compensate for both the individual and cumulative effects of wind turbine projects on raptors.

We also understand that ground squirrel control has been implemented in some areas to reduce raptor foraging near turbines. We are concerned about impacts to other wildlife species resulting from these control efforts. Ground squirrels play a key role in the food chain as a prey species for San Joaquin kit fox, golden eagles and other special-status species. They also create burrows, which are often used by tiger salamanders, red-legged frogs and burrowing owls. The removal of ground squirrels from this area would threaten the long-term viability of these special-status species in the Altamont Hills.



During the past five years, the District has acquired 3,000 acres of sensitive open space at Brushy Peak and Vasco Caves in the Altamont Hills. These protected areas contain significant nesting locations and/or foraging habitat for some of the raptors species that have been so adversely affected by wind turbines. Both preserves are also known to contain populations of tiger salamander and red-legged frog. Kit foxes were observed at both locations in 2002.

The wind turbine areas adjacent to the open space areas act as sinks for the raptor species and other sensitive wildlife. Raptors that disperse from protected areas into wind turbine areas may be killed or maimed by wind turbines, and are directly affected by rodent control programs on land adjacent to Regional Parks. We have taken considerable efforts to protect raptor-nesting sites on our lands; however, our success in protecting these species is dependent upon their protection in adjacent private lands. Without adequate measures to protect raptor species in the Altamont Hills, the long-term viability of raptors on adjacent public lands is also in question.

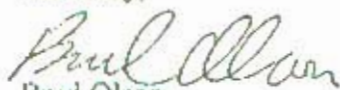
The 1998 Altamont Hills Repowering EIR made no provision for removal or replacement of larger turbines if monitoring showed an increase in raptor mortality. We have seen no information that demonstrates that this new generation of turbines will actually reduce impacts. You may recall that we commented on the 1998 Repowering EIR about the need for additional mitigation measures to protect raptors and other wildlife. Such mitigation measures should be provided through an FIR or mitigated Negative Declaration. This CEQA document should provide a monitoring plan with achievable success criteria and contingency measures.

We recommend the County consider the following mitigation measures for wind turbine impacts:

- Establish a mitigation fund—similar to the tippage fee now being collected at the Altamont Landfill to mitigate for open space impacts—that can be used to acquire, protect, restore and manage other open space areas to benefit impact species.
- Restrict or prohibit ground squirrel control in the wind turbine areas.
- Implement further protective measures, such as conservation easements over private lands that contain wind turbines in order to keep them viable for other sensitive and special-status species that use these important grassland areas.
- Establish a periodic review of wind turbine operations based upon on-going monitoring data. This periodic review should include local experts knowledgeable in raptor natural history. If turbines continue to impact raptors and other wildlife, take corrective actions, including removal of offending turbines and other facilities.

Please call me at (510) 544-2622 should you have any questions regarding our letter.

Sincerely,



Brad Olson
Environmental Programs Manager

cc. Jeff Miller, Center for Biodiversity
David Brockbank, Contra Costa County