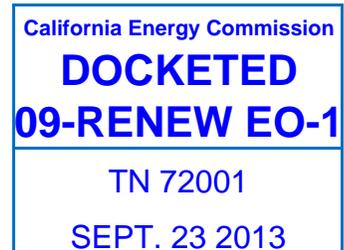


**Defenders of Wildlife ~ Center for Biological Diversity ~ Sierra Club ~  
Natural Resources Defense Council ~ Audubon California**

September 20, 2013

Dave Harlow, Director  
Desert Renewable Energy Conservation Plan  
California Energy Commission  
1516 Ninth Street  
Sacramento, CA 95814-5512  
DHarlow@energy.state.ca.us

California Energy Commission  
Dockets Office, MS-4  
Docket No. 09-RENEW EO-01  
1516 Ninth Street  
Sacramento, CA 95814-5512  
docket@energy.state.ca.us



Dear Mr. Harlow:

Our organizations are writing in regards to issues related to Golden Eagles (*Aquila chrysaetos*) and wind energy facilities in the Desert Renewable Energy Conservation Plan (DRECP) area. Specifically, we are writing to ensure that the DRECP agencies are considering all baseline fatalities of Golden Eagles and the application of standardized monitoring and reporting protocols as they draft the conservation strategy for the species. Specifically, we are writing to draw attention to the existing data for Eagle fatalities at operating wind generating facilities in and adjacent to the DRECP area.

As you are already aware, a recent summary of Bald and Golden Eagle mortalities at wind energy generating facilities in the contiguous United States reveals that there have been 27 documented Golden Eagle mortalities at wind energy facilities between 1997 and June 2012<sup>1</sup>. Since the Altamont Priority Wind Resource Area (APWRA) is excluded, we conclude the majority of these fatalities are either from the San Geronio Pass area or the Tehachapi Mountains. Considering all but one of these fatalities was discovered through incidental observation and not surveys directed at documenting fatalities, we conclude that there are most likely more Golden Eagle fatalities than the documented records show, due to the lack of standardized post-construction mortality monitoring. Additionally, the study does not include mortalities documented since June of 2012.

We assume that the DRECP will incorporate all the information that is available on the current status of Golden Eagle mortalities as it develops the conservation strategy for Golden Eagles. We

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<sup>1</sup> Pagel, J. et al. 2013. *Bald Eagle and Golden Eagle Mortalities at Wind Energy Facilities in the Contiguous United States*. Journal of Raptor Research 47(3): 311-315.

look forward to learning more about the conservation strategy and how the baseline fatalities will be addressed in the DRECP.

Additionally, we would like to stress the importance of standardized pre- and post-construction monitoring and reporting protocols of Golden Eagle fatalities at wind energy facilities. Going forward, this information will help to provide an accurate baseline of fatalities at wind energy facilities and will assist the DRECP in meeting the NCCP conservation standard of a stable or increasing Golden Eagle population.

Thank you for your continued dedication to Golden Eagle conservation and to developing a strong conservation strategy for the DRECP.

Sincerely,



Kim Delfino  
California Program Director  
Defenders of Wildlife



Ilene Anderson  
Biologist/Public Lands Desert Director  
Center for Biological Diversity



Sarah K. Friedman  
Senior Campaign Representative  
Beyond Coal Campaign  
Sierra Club



Garry George  
Renewable Energy Director  
Audubon California

A handwritten signature in black ink, appearing to read "Helen O'Shea". The signature is fluid and cursive, with the first name "Helen" and the last name "O'Shea" clearly distinguishable.

Helen O'Shea  
Director, Western Renewable Energy Project  
Natural Resources Defense Council