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October 25, 2010

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505 Van Ness Avenue
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Subject: California Condor and other Listed Species at the Manzana (Formerly PdV)
Wind Project

Dear Mr. Boccio:

On September 15, 2010, Department of Fish and Game (Department) staff visited the Manzana Wind Project (Project) site with representatives from Iberdrola Renewables and Pacific Gas and Electric Company (PG&E). Because your agency has been requested to approve PG&E's purchase and operation of the Project, and the Department is a Trustee Agency and potentially a Responsible Agency for the Project, as those terms are used in the California Environmental Quality Act (CEQA), the Department submits this letter to you to convey our field observations and recommendations on the Project. The Department's jurisdiction and concerns relating to the State and Federally endangered and State fully protected California condor (*Gymnogyps californianus*), the State and Federally threatened desert tortoise (*Gopherus agassizii*), and other species were described in letters to Kern County (County) dated August 10, 2006 (comments on Notice of Preparation), and July 21, 2008 (comments on the Final Environmental Impact Report (EIR)). This letter elaborates on those concerns and others based on what we learned from the Project site visit and further review of the available information on species distribution.

In summary, the Department has concluded that condors are likely to utilize the Project site and may be at risk of colliding with wind turbines. Prior analyses prepared by consultants for this Project and adjacent projects have been based on inaccurate assumptions and a poor understanding of the data limitations. The current requirement to reduce grazing over ten years allows grazing to continue for 40 percent of the Project's life and would reduce only one of many potential forage sources for condors. Implementing grazing restrictions and other measures may be hampered by the applicant's land control being limited to the facility footprint, and by the wind zoning that has been applied only to turbine strings as opposed to entire parcels. The Department recommends that the Applicant obtain land control over the full extent of affected

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parcels and fence the entire outer perimeter of those combined parcels to control unauthorized livestock and other trespass.

All fencing should allow pronghorn antelope (*Antilocapra americana*) passage. The bottom strand should be smooth wire at least 18 to 20 inches from the ground. Additionally, the Project is within occupied desert tortoise (*Gopherus agassizii*) and Swainson's hawk (*Buteo swainsoni*) habitat and warrants an incidental "take" authorization for these species.

The Department cannot authorize "take" of the fully protected species golden eagle (*Aquila chrysaetos*), which occurs on the Project site, or the State endangered and fully protected species peregrine falcon (*Falco peregrinum anatum*), which the EIR states is at risk of "take" from the Project.

Concerning the California condor, this letter should in no way be construed as an approval or recommendation to operate turbines at this Project site. The Department maintains that condors are highly likely to utilize the Project site over the course of the Project's 25-year life. Operating wind turbines at this location risks "take" of this fully protected species and the Department cannot authorize "take" of California condor. This letter is expressly in the interest of informing your decision-making process and recommending some means of reducing risk to condors should any entity choose to construct and operate wind turbines at this location.

California Condor

Proximity to Known Activity: The Project would place wind turbines on the southern flank of a mountain top within approximately four (4) miles of where California condors regularly roost and would place turbines approximately two (2) miles from an area where roosting and/or feeding activity has been detected within the last year.

As the Department and the United States Fish and Wildlife Service (USFWS) have described previously, several factors limit knowledge of condor spatial use of the area. Only one-quarter to one-third of the condors in this area have been tracked in a given year, and the data points from these individuals are collected only hourly. The hourly locations of most of the birds are not tracked. For those that are tracked, long-distance movements and feeding events that occur between the hourly data collections go undetected. Thus, the data points represent only where some of the condors are located some of the time.

Individual condors regularly fly hundreds of miles in a day and have home ranges of hundreds or even thousands of square miles. A distance of two or four miles from

known high activity areas, combined with the data limitations, affords little confidence that the birds are not currently using the Project area or that they would avoid the Project area over the next 25 years when turbines are proposed to be operating.

Analysis Presented in Kern County's Addendum EIR: Several statements made in Kern County's Addendum EIR, written by Sapphos Environmental (a California Wind Energy Association member) for Iberdrola Renewables (the County's applicant), deserve further discussion as they were the basis for the County's determination of the significance of potential impacts to California condor:

1. *"The sparse vegetation in the desert environment provides limited grazing for seasonal livestock operations. There are no native populations of ungulates such as deer within the infill project property; therefore, there is no recreational hunting activity for ungulates such as deer and feral pigs. Potential for carrion would be limited to periods of seasonal grazing activities."* This statement implies that game hunting and domestic livestock grazing provide the only food sources for condors, which is inaccurate. It also inaccurately states that ungulates do not occur on the Project site and that grazing is "limited." Animals die of natural causes, including disease, lightning strikes, and predation from mountain lions, which are expected to occur on the site. Deer are ubiquitous in the Tehachapi Mountains and their foothills. Fresh sign of cattle grazing was abundant on the Project site during the September 15, 2010, site visit. A small group of pronghorn antelope is known to use the Project site (this was confirmed by the EIR). Fresh sign of black bear (*Ursus americanus*)—another potential source of carrion—was observed on the Project site during the site visit. There are no means of controlling grazing on the Project site, which is entirely unfenced and not posted for trespassing. In all likelihood, because of the open-range rules in Kern County, the Project site is seasonally grazed by large flocks of sheep without knowledge or consent of the property owner. Such is the case on adjoining wind project sites. Finally, condors consume many types of carrion in addition to large mammals (Collins et al. 2000). This is discussed below in "Forage Availability in Addition to Large Mammals".
2. *"There are no strong and reliable winds coming up out of the San Joaquin Valley that interact with the specific topography of the region to support highly efficient foraging movements of the birds."* This statement implies that we understand what types of wind condors use or avoid, and where those winds occur, to the degree that we can accurately predict where condors will go over the next 25 years. This is not the case. This statement in the Addendum also assumes that air movement out of the San Joaquin Valley is

what is important for condor foraging in the Tehachapi area. No one has demonstrated significant relationships between specific wind characteristics and condor habitat use to allow predicting condor occurrence, or whether the types wind above the project site would preclude condor use; nor has anyone characterized the wind at the project site at any altitude above the height that is important for wind turbines. It should be noted that the USFWS and the United States Geological Survey are at the beginning of a long-term project to attempt to correlate wind characteristics and condor behavior. The current thought is that thermal height and velocity, as opposed to wind movement across the mountains from the San Joaquin Valley, may be an important predictor of condor flight behavior. Thermal height and velocity are high over the edge of the Mojave Desert where this Project is located. Large thermals were observed in the Antelope Valley adjacent to the Project site during the site visit. In addition, the prevailing surface winds that have been measured across the Project site blow perpendicular to the ridgelines where turbines would be sited. Combined with the steep slopes that drop off immediately below the turbine sites, these conditions would be expected to allow a relatively easy take-off for a condor. Therefore we find it unreasonable to conclude that condors would avoid either soaring over the Project site in search of food or landing at the Project site to forage.

3. *"Although there is a recoverable wind resource within the infill project property, it does not have the same characteristics as the wind at Tejon Ranch. The designated critical habitat at Tejon Ranch ranges in elevation from 6,380 feet above mean sea level (MSL) to 1,160 feet above MSL, whereas the infill project property is lower in the valley, has less topographic relief, and ranges from 3,987 feet above MSL to 3,452 feet above MSL."* This statement seems to attempt to argue that the Project site's elevation is not the same as the nearby condor Critical Habitat unit, yet the Project site's elevations of 3,452 to 3,987 feet are within the range of the Critical Habitat unit's elevations of 1,160 to 6,380 feet. On the entire Project site, including the "infill" properties, turbines would actually be at elevations of up to approximately 5,000 feet. Significant parts of the Critical Habitat unit are, for the purposes of predicting condor use, the same as the Project site in terms of topography, wind, forage potential, and plant communities. Both the Project site and large areas of the Critical Habitat unit are on the southeast slope of the Tehachapis and extend into the Mojave Desert.
4. *"There are no strong populations of other scavengers such as common ravens and golden eagles that the condors make use of in locating food efficiently. As a result of directed surveys conducted in all four seasons, the*

infill project property was demonstrated to contain relatively low levels of prey and a corresponding low level of scavengers, particularly common ravens and golden eagles. Many ravens were observed by Department and PG&E staff during the Project site visit. See list item #1 above regarding forage availability. The Department does not concur that either a low level of forage or scavengers has been demonstrated. A recent aerial survey of the adjacent proposed wind development (Pacific Wind) and vicinity (including the Manzana site) found eight eagles in seven days prior to fledging, which suggests that their population is not low. Two golden eagles are known to have been killed within the last year at one Tehachapi-area wind farm. In addition, wind turbines are known to increase raven abundance in response to the constant source of carcasses from bird and bat fatalities. Regardless, population levels of ravens or golden eagles have never been shown to be a predictor of condor occurrence or habitat value, nor has this ever been suggested by any literature or species expert. Condors use vast areas with various population levels of these other species.

5. *"Tejon Ranch has a unique geographic position, rendering it a central crossroads for condor movements between other important use areas within the historical condor range as a whole (e.g., between the Sespe Sanctuary and the southern Sierra Nevada, and between the Coast Range and the Sierra Nevada)."* This is a true statement for current condor range, but condors also regularly use areas that do not lie between other important areas. As discussed above, the Project site is adjacent to an area of known importance to condors; this proximity makes it highly likely that condors will use the Project site at some point during the next 25 years when wind turbines would be operating on the Project site.
6. *"There is no recorded historical use of the infill project property by condors."* As the Department and the USFWS have described many times, historical condor data is extremely limited. The historic data is even more limited than the global positioning system (GPS) data and it does not reflect spatial use precisely enough to say that a distance of a few miles is out of historic range. Most of the historical data reflects only incidental observations from various observers on the ground. Most of the historic data is from the period when the condor range had retracted severely and few animals remained in the wild. Thus, the historic data do not provide the means to draw definitive lines on the extent of the condor range. However, even the limited data available document a historic condor location approximately one mile west of proposed turbine locations, at Cottonwood Creek (this data point could represent one condor, multiple condors, a feeding event, roosting, or soaring). The historic

data should also not be used to project the full extent of *future* condor spatial use. As an example of why this should not be done, we note that the historic data contain few data points in the Double Mountain area (just north of the Project) while data from 2005 to 2010 show frequent use of the Double Mountain area by several condors. The Department cannot conclude that the lack of recorded historic condor use of the Project site suggests either that condors have not used the Project site or that condors would not use the Project site during the next 25 years of Project operations.

7. *"There are no available suitable overnight roosting locations. There are no suitable trees or rocky crags to provide suitable overnight roosting locations for California condor on the infill project property."* During the site visit, Department staff noted mature stands of grey pines (*Pinus sabiniana*) on extremely steep slopes adjacent to the Project along Tylerhorse Canyon. It appears that large grey pines also occur on slopes on the Project site on the west half of Section 9, T10N, R15W, SBBM. California condors roost in grey pines. A large outcrop and cliff face were also noted on the east wall of Tylerhorse Canyon in Section 10, adjacent to the Project.

Forage Availability in Addition to Large Mammals

As discussed above, the Project site does in fact support large wild mammals and livestock. In any assessment of condor forage availability, it is essential to remember that condors are opportunistic foragers and that smaller animals likely comprised a significant portion of the historic condor diet. In addition to cattle, deer, and sheep, remains of many species that occur on the Project site have been found in condor nests, including coyote (*Canis latrans*), grey fox (*Urocyon cinereoargenteus*), rabbits, snakes, ground squirrels, gophers, and kangaroo rats (Collins et al. 2000). The breadth of the condor diet is much wider than the County's EIR suggests (Figure 1).

Figure 1. Faunal Remains in Condor Nests as reported by Collins et al. (2000)

TABLE 1. Identifiable faunal remains believed deposited by California Condors in 40 recent nests.^a

Species	Number of sites	Minimum number of individuals ^b
Artiodactyla		
Cattle (<i>Bos taurus</i>)	17	23
Mule deer (<i>Odocoileus hemionus</i>)	2	2
Sheep (<i>Ovis aries</i>)	2	2
Carnivora		
Coyote (<i>Canis latrans</i>) ^c	2	2
Gray fox (<i>Urocyon cinereoargenteus</i>) ^c	2	2
Long-tailed weasel (<i>Mustela frenata</i>) ^c	2	2
Lagomorpha		
Black-tailed jackrabbit (<i>Lepus californicus</i>)	1	1
Brush rabbit (<i>Sylvilagus bachmani</i>) ^c	1	1
<i>Sylvilagus</i> sp. ^c	4	4
Rodentia		
California ground squirrel (<i>Spermophilus beecheyi</i>)	7	7
Belding's ground squirrel (<i>Spermophilus beldingi</i>)	1	1
Golden-mantled ground squirrel (<i>Spermophilus lateralis</i>)	1	1
Botta's pocket gopher (<i>Thomomys bottae</i>) ^c	3	4
Agile kangaroo rat (<i>Dipodomys agilis</i>) ^c	1	1
<i>Dipodomys</i> sp. ^c	1	1
Reptilia		
Coachwhip (<i>Masticophis flagellum</i>) ^c	1	1
Mollusca		
Pismo clam (<i>Tivela stultorum</i>)	3	3
Common californian venus (<i>Chione californiensis</i>)	1	1
Moon shell (<i>Polinices</i> sp.) ^c	1	1
Indeterminate marine mollusc	3	3
Crustacea		
Barnacle (<i>Balanus</i> sp.) ^c	1	1
Aves		
Indeterminate grebe ^c	1	1

^a Remains found in nests also included man-made artifacts (45 pieces of plastic, 10 fragments of aluminum cans, 5 pieces of glass, 2 metal bottle caps, 1 pop top from a beverage can, 1 aluminum foil ball, 1 lead bullet, 1 plastic comb fragment, and several photographic flashbulbs) and faunal elements believed to be of non-condor origin (4 *Tamias merriami*, 3 *Glaucomys sabrinus*, 13 *Neotoma fuscipes*, 12 *Neotoma lepida*, 19 *Neotoma* sp., 6 *Peromyscus californicus*, 2 *Peromyscus truei*, 8 *Peromyscus maniculatus*, 1 *Peromyscus* sp., 4 unidentified passerines, and 3 *Helminthoglypta* sp.).

^b Minimum number of individuals assumes different individuals in different sites.

^c Items not reported as condor food remains in nest caves by Koford (1953). Note: none of the faunal elements classified above as of non-condor origin were reported by Koford.

Figure reproduced from Collins et al. (2000).

Feasibility of Reducing Forage Sources

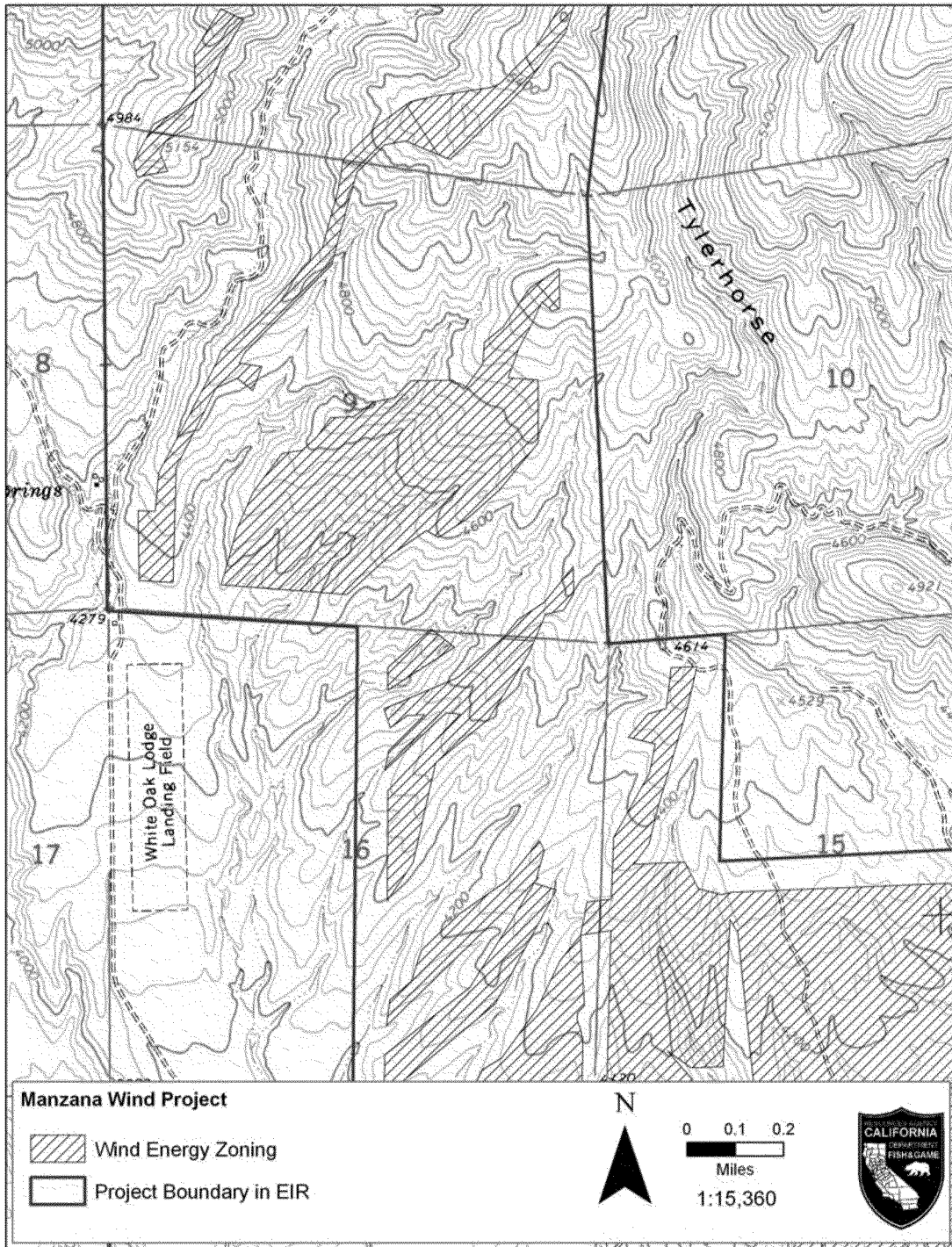
It will not be feasible to reduce or eliminate most of the potential forage species found on the Project site, identified above. The County's EIR does require that "The project proponent will work with the property owners to phase out grazing on the project site over the next 10 years" (mitigation measure 4.4-10). This could reduce the availability of one potential forage source. However, several circumstances put the feasibility and effectiveness of this measure in question:

- 1. Livestock Exclusion Fencing.** The EIR mitigation measure 4.7-10 requires that the Project conform to Kern County Zoning Ordinance Section 19.64.140, which stipulates that "Fencing shall be erected for each wind machine or on the perimeter of the total project...Where perimeter fencing is utilized, the Planning Director may waive this requirement for any portion of the site where unauthorized access is precluded due to topographic conditions." This measure was prescribed to minimize public safety risks, and the fencing plan presented in the final EIR commits the applicant to only partial perimeter fencing. Partial fencing would not exclude livestock. The Iberdrola and PG&E representatives at the September site visit stated that there is no intention of constructing livestock exclusion fencing for the Project. Even if fencing were to enclose the Project facilities, the EIR allows the fencing to be placed only around the individual turbines. Thus, there is no requirement in the EIR or the Addendum to construct fencing at a sufficient distance from turbines to substantially reduce the potential for condor fatality risk associated with livestock carcasses near turbines.
- 2. Extent of Property Control.** The Iberdrola representative stated that the leases for constructing and operating the Project extend to only the footprint of the Project facilities, not the full extent of the "project boundary" as depicted in the EIR and Addendum. The underlying property owners retain the rights to continue grazing, developing home sites, placing trailers and agricultural buildings, and conducting other activities beyond the Applicant's control. This limits the ability to control grazing, install fencing, limit microtrash or garbage, or do any other potential forage reduction at any location beyond the footprint of the Project facilities.
- 3. Definition of Project Limits.** Kern County staff have asserted to the Department on similar projects that their CEQA authority extends only to the areas where they are changing zoning classification to allow wind development. On this Project site, the zoning change was applied only to the turbine row locations instead of the entirety of the affected parcels. Figure 2

shows the northern part of the Project as an example of how the wind energy zoning classification does not conform to parcel boundaries or the "Project Boundaries" as depicted in the EIR and Addendum. The Department is unclear on the County's intention or ability to enforce the EIR measures beyond the area zoned for wind energy. Similarly, we are unclear on whether by adopting the County's EIR and Addendum, the CPUC would be limited to enforcing the mitigation measures only within the areas zoned for wind energy. Regardless, if the applicant's lease applies only to the footprint of the facilities as described in item #2 above, then the applicant would not have the ability to assure implementation of the mitigation measures across most of the Project site as mapped in the EIR.

4. **Grazing Phase-Out Requirement.** The EIR's requirement to phase out grazing within ten years means that grazing will continue for 40 percent of the life of the Project. The measure does not specify stocking rates or any specific reduction rate per year, leaving open the possibility that stocking rates would remain the same or even increase throughout the ten-year period. Further, the measure states that the "The project proponent will work with the property owners to phase out grazing on the project site over the next 10 years." One could interpret this to mean that the applicant is simply required to work with the property owners to phase out grazing. This leaves open the possibility the some uncooperative property owners would continue grazing, but the applicant will have complied with the requirement if they tried to work with the property owner. The applicant should be required to eliminate all grazing before the turbines operate.
5. **Activities on Inholdings and Edges.** As discussed above, eliminating grazing would eliminate only one potential food source. The effectiveness of this measure would be further limited by the fact that there are several inholdings and extensive edges around the project where landowners are likely to continue running livestock near turbines.

Figure 2. Project Boundary Compared to Wind Energy Zoning



Additional Condor Analysis: During the site visit, the Iberdrola representative recommended that the Department review a condor risk analysis prepared by Sapphos, Inc., for the adjacent Pacific Wind Project, suggesting that it was applicable to the Manzana Project as well. The Department has reviewed that analysis and finds for reasons presented below it cannot be relied on for assessing potential risks of wind development in the area.

The condor risk analysis relies on habitat suitability model inputs that are invalid. The model uses land coverage data to characterize terrestrial habitat. In the analysis, condor habitat values were assigned to those terrestrial features without input from species experts and much of it without any published literature to substantiate the assigned values. Many of the assigned values are patently inaccurate and/or not applicable to assessing the risk from wind turbines. For example, the author assigned a value of zero for habitat types without trees, while areas without trees are where most foraging is observed. Foraging events are when condors may be at elevated risk of colliding with wind turbines because, when approaching or leaving a carcass, condors fly at turbine rotor heights and have the least control of their flight.

The model is based on conclusions about slope suitability from an unpublished, non-peer-reviewed report prepared by the Ventana Wilderness Society. In addition to that report assessing data only from condors that occupy a different area (Monterey County), the data were strongly influenced by the fact that the young birds which the data represent had not yet ventured far from release sites or begun to forage independently. Release locations and feeding stations were still strongly influencing foraging behavior in that group of condors at that time, which is not the case now in Monterey or in Kern County. Further, that report did not stratify the GPS data per condor behaviors other than "perching" or "flying." Different types of flight are not considered, nor are foraging, roosting, and perching, which are likely to be associated with different terrestrial habitat attributes. If there are terrestrial habitat attributes associated with soaring, they are likely to be different than habitat characteristics associated with foraging, roosting, long-distance flights, and other behaviors. Uneven representation of behavior types in the GPS data is expected to bias the results toward those behaviors that are most represented and mask those behaviors that are represented less frequently, such as foraging.

The Ventana report also attempts to correlate slope and aspect with condor occurrence. However, the availability of each slope and aspect category within the study area was not quantified, so it cannot be concluded that condors selected specific slopes or aspects. The Ventana report tested whether condor occurrence above slopes was more or less than expected, assuming an even distribution of slope and aspect classes across the study area. The slope and aspect maps in the report show that slope and

aspect are not distributed evenly. What is reported as preferential selection of a given slope class or aspect may be explained by that slope or aspect occurring more frequently in the study area. For example, the report states that slopes with an east aspect were selected the least, but the aspect map in the report shows that east slopes are by far the least frequent slopes in the study area (this is because the ridgelines run generally east-west). The report also used data from an arbitrary radius around a location in the Salinas Valley, rather than the entire home ranges of individual condors, which likely affects the results. Any attempt to measure habitat selection should consider proportional use within individuals' entire home ranges, which considers the proportionate availability of each habitat type.

Proximity to release sites is of diminishing importance for predicting condor presence. For most of the condors, the release sites are not within the area that the condors most often use. The "distance from release locations" parameter used in the Sapphos model is unfounded.

Perhaps most importantly, many of the condor locations are actually aerial locations, yet the analysis is based on terrestrial habitat attributes. It assumes causal relationships between terrestrial characteristics and aerial bird locations without an understanding of how condors use wind, or where different types of wind occur within the study area. Wind characteristics likely influence condor flight locations and behaviors much more than the terrestrial habitat attributes used in the model. The model does not account for wind characteristics, but assumes that certain topographic characteristics cause certain wind characteristics that are assumed to explain condor locations. The relationships between types of wind (e.g., thermals, mountain waves) and condor flights have not been quantified in the Sapphos analysis, other unpublished reports, or published literature. Nor has the Sapphos analysis measured or mapped the types of wind that actually occur in the study area to show that the winds assumed to promote condor flight do not occur on the Project site.

The Department would be happy to discuss further problems with the model at your convenience.

"Take" of Swainson's Hawk and Peregrine Falcon

The Addendum concludes that the Project would have significant, unmitigated impacts to Swainson's hawk and peregrine falcon and concludes that "take" of these species would occur. The Department agrees that there is potential for "take" of these species.

To date, we have not received an Incidental Take Permit application for Swainson's hawk or heard from either Iberdrola or PG&E of any intention to apply for incidental

"take" authorization. Any "take" without authorization would be a violation of the California Endangered Species Act and Fish and Game Codes §§3503 et seq. The Swainson's hawk population in the Antelope Valley consists of less than 10 breeding pairs. Any fatalities would represent a substantial loss to this population. Measures to minimize and offset the "take" of this species are available, effective, and feasible, including providing enhanced foraging and nesting habitat in perpetuity. The Department recommends incorporating a habitat compensation requirement in the Project approval conditions.

Peregrine falcon is a fully protected species (Fish and Game Code §3511). The Department cannot permit "take" of this species. The Department was unable to locate measures in the EIR or Addendum that would avoid "take" of peregrine falcon. The Department recommends developing measures to avoid "take" of this species.

Fencing for Pronghorn

As confirmed in the EIR, pronghorn occur on the Project site. The Project site and vicinity is currently unfenced, which is ideal for pronghorn. This group of pronghorn uses a large area encompassing the Project site and similar habitats east and west of the Project, ranging from the Tejon Ranch to the Tehachapi area. Pronghorn typically do not jump fences and almost always slide underneath them instead. Improperly designed fencing at this Project and other wind development projects in the area has the potential to limit pronghorn movements and increase fawn predation by coyotes. Any fencing on the Project site should be smooth or barbed wire with a smooth bottom wire. The bottom wire should be a minimum of 18 to 20 inches from the ground.

Desert Tortoise


As the EIR describes, much of the Project site is suitable desert tortoise habitat. Tortoise sign was detected during surveys for the project, but the parcel where sign was detected was removed from the Project. Removing this parcel from the Project footprint does not mean that tortoises are absent from the Project site. Additionally, tortoise surveys do not detect all tortoise sign that is present. Tortoises have been observed within the last two years on many of the other wind energy development sites that are connected to the Project site via contiguous, suitable habitat. The Project would displace and degrade occupied desert tortoise habitat and has the potential to "take" tortoises during construction and throughout the life of the Project. Turbine operation would create a new, constant source of carrion, which has been observed to increase raven abundance. This in turn is expected to increase tortoise predation. Raven management and compensatory mitigation measures are warranted for this Project's potential impacts to desert tortoise. On-site raven management should include measures to prevent food and water subsidies and nesting opportunities. The Applicant

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should also be required to contribute to the regional raven management program administered by the USFWS to address the impacts of the increased carrion source and other impacts which affect raven abundance beyond the Project boundaries.

Thank you for considering the Department's observations and comments on the Manzana Project. If you have any questions regarding these comments, please contact Dave Hacker, Staff Environmental Scientist, at 3196 Higuera Street, Suite A, San Luis Obispo, California 93401, by telephone at (805) 594-6152, or by email at dhacker@dfg.ca.gov.

Sincerely,


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