

## **The wind industry deserves No Tax Credits**

I read the report submitted to Congress from the California Energy Commission concerning Avian Mortality from wind turbines and wind farm infrastructure. In my opinion Congress was lied to and deliberately misled about the dangers of the propeller style wind turbine. If Congress has the time to spend on Rodger Clemens for his testimony, surely Congress has the time to investigate this much more important matter concerning the annual slaughter of millions of birds and the ongoing cover-up by the wind industry. I encourage every member of Congress to read my report below and then go back and compare the statements submitted by those representing the wind industry.

### **THE 28 YEAR WIND INDUSTRY COVER-UP Part 1**

A recent study from Spain estimates bird mortality to be 6-18 million birds and bats annually from their 18,000 installed wind turbines with an installed capacity of 20,676 MW. This works out to a staggering total of 333-1000 birds and bats per turbine or 290-871 mortalities per MW for wind energy in Spain. In America, on the AWEA web site the reported bird death rate from wind turbines is 2.9 fatalities per MW.

These numbers from Spain are several hundred times more than the reported mortality from the wind industry in America. There is a reason for this is disparity. It is because of wind industry interference. It has been going on for the last 28 years and still to this day, there has not been a properly conducted bird mortality study done in America.

To fully understand this cover-up I am going to take a look back to the beginnings of the wind industry, because what took place in the 1980's, set the industry on a path that they still tread on today.

My discussion of the condor from the early 1980's will bring to light a combination of facts and circumstances never before disclosed about the wind industry. What happened to the condor is part one of a two part investigation into the 28 year bird mortality cover up by the wind industry.

In 1980 the wind industry was just beginning to set roots in California. Wind energy was a new frontier, a new technology and investors saw a great opportunity to reap profits. During that same time the struggling condor population, by best estimates, was down to only 25 to 35 condors left in the wild. The small population of condors was considered to be somewhat stable even though it was severely endangered. Their small numbers had been hanging on for several decades but they were declining. But their exact numbers were in question because their huge foraging territories covered several thousand square miles and researchers weren't sure which birds they were seeing at any given location.

In 1982 two researchers Noel Snyder and Eric Johnson set out to get an exact condor numbers by setting up 21 different stations in their foraging habitat. This was done so they could get photographic details of every condor that would provide distinguishable characteristics of all the individual condors. In 1982 they estimated 21-24 condors. The

next year from data taken up to October 30 1983 they estimated 19-22 condors remaining documenting a decline. In their report they also noted that at the current downward trend, it was projected that the wild condor population would go extinct sometime between the 1993 and 2003.

Just 15 months later in January 1985 reports came in from the field that one or both adult condors were missing from their respective breeding territories. In April another condor was found dead and was determined to have died from lead poisoning. The population was down to only 9 condors and in a short span of just 15 months, the population had dropped by more than 50%. As it was stated later in a FWS document "it was clear that some disaster had struck".

After these catastrophic losses, a decision was made to trap the remaining condors. Eight of the 9 remaining condors were captured and put into captivity.

**Was it lead poisoning?** It was well documented that exposure to lead was killing condors but this had been going on for decades. While it was most likely the primary reason for their gradual decline over the decades it is not reasonable to think this was the cause for the sudden decline. In fact their exposure to lead fragments had likely decreased over the years because hunting pressure had declined dramatically from the 1950s and early 1960's and wounded deer left in the field in their habitat, were far fewer in number. In addition the remaining condors had been receiving clean supplemental food at feeding stations for years. So what did kill off the condors so dramatically and in such a short period of time?

The FWS statement was correct, a disaster had struck. From 1983 through 1985 there was an explosion of wind development which added over five million square feet of spinning wind turbine blades into this same area. At the end of 1982 there were 323 small wind turbines that had been recently placed in the condor habitat. By the end of 1985 thousands of new and larger wind turbines had invaded their home, which included the Tehachapi Pass wind resource area. Wind developers had increased their footprint with 19 times more rotor sweep so they could take advantage of expiring tax credits that would end at the of 1985. It would prove be the final blow to the condors.

We know for certain wind turbines slaughter all species of birds and this new frontier of wind development was put in condor habitat. We know this because the study of Noel Snyder and Eric Johnson proved it. If you look at the map provided from the study, station 18 was one of the research locations where the condors were photographed station 18 was one of the research locations where the condors were photographed. These two researchers also reported that all the condors were routinely moving throughout their habitat and were photographed at multiple stations. What this means is that the condors were frequently passing over Tehachapi wind turbines as they travelled from the North East area of their range (stations 19, 20 and 21) to the South West area (most other stations).

I also took the map from the Snyder, Johnson study and superimposed it on to a Google earth image. When I blew up the image where station 18 is located, it was in the middle

of a wind development (see enclosed image). Even if were not, it is still in the heart of their habitat in the Tehachapi Wind Resource Area.

In another development, in April 1985 after the news of the missing condors was revealed, the California Energy Commission (CEC) issued a major statement concerning the condor in a Wind Energy Development in California Status Report [P500-85-003.pdf](#) . It was declared that "**A major conflict with wind development (primarily in Los Angeles, Ventura, Kern, Tulare, Kings, Santa Barbara, San Luis Obispo, and Monterey counties) is the California Condor.** The California Condor is nearly extinct and has been designated as a Federal and state endangered species.

"Because condors tend to soar along ridgelines, are large, and not very maneuverable, **the primary concern is collisions with wind machines** and transmission lines. Condors as well as other birds, are known to fly into tall objects".

"The Condor Research Center (CRC), funded by the US Fish and Wildlife Service, the State Department of Fish and Game, and the Audubon Society, has proposed that wind development be curtailed in Condor roosting and foraging habitat. (See Map 2) until more data is available about the bird and until the condor population is increased to a level where it may be possible for it to sustain itself".

"The CRC estimates that it will probably be three to five years before adequate information is available to determine, with any accuracy, if and where developers will be able to construct **wind turbines** without creating a hazard to the condors."

The report goes on to say that "The problem developers face is that several prime wind development locations are **within the known and potential condor range** and developers want to be able to take advantage of federal and state tax credits that will expire in 1985 and 1986 respectively(there is a pending proposal to extend the federal tax credits)".

In 1985 the State of California and the CRC declared that collisions with wind turbines were a primary concern and a hazard to the condors. Surprisingly, no other information was given in the report about the many other species at risk or being killed by wind turbine collisions.

I want to point out that if anyone is naive enough to believe that the industry would report a dead condor in 1983 or 1984, they must consider an obvious fact about this emerging industry. Billions had already been invested and just one dead condor would have shut down this industry in America. It was an easy choice for greedy investors. Thousands of other dead birds were already being hidden, a few more did not matter.

Since the condors went missing and the CEC 1985 report warning of the wind turbine dangers to condors was published, Kern County has never stopped installing wind turbines. Since 1985 they have allowed wind development to add another 18,000,000 square feet of lethal rotor sweep, they have approved plans for another 35,000,000

square feet, and in the foreseeable future, there are projects that bring nearly another 100,000,000 square feet to Kern county.

When compared to 1982 when there were 21-25 free flying condors, this will be 650 times more rotor sweep with turbines 40-50 times the size of the early turbines.

Yes, the condors were saved by captive breeding, but their habitat was turned into a mine field by the wind industry. Today the released condors are closely monitored, and if they start to wander into their former habitat, they must be trapped before the turbines get them. There is no doubt some of them will escape the vigilance of the biologists, and get killed. How do you stop a condor from riding the wind?

Part two will cover all the other species being killed by the wind industry, the fraudulent reports, and how they are getting away with it.

Photographic Censusing of the 1982-1983 California Condor Population  
[http://www.biologicaldiversity.org/species/birds/California\\_condor/pdfs/conbio-condorarticle.pdf](http://www.biologicaldiversity.org/species/birds/California_condor/pdfs/conbio-condorarticle.pdf)

## **THE 28 YEAR WIND INDUSTRY COVER-UP Part 2**

In the first part of this wind industry cover-up story, it was pointed out how California Condors were trapped from the wild in the mid 1980s as an emergency response to save the quickly disappearing population from thousands of turbines that had been placed in the Tehachapi Pass region.

What is not known is that during this same period of time in the 1980s, tens of thousands of other birds also perished at California wind farms. If one chooses not to believe any of this, then knowing how the industry responded in 1989 should convince anybody about the ongoing 28 year mortality cover-up by the wind industry.

In the 1980s as the turbine numbers and size expanded, wind personnel began seeing increasing numbers bird carcasses around the turbines. Due to the severity of the avian mortality problem, the wind industry adopted a strategy for survival: whatever happens on a wind farm, must stay on the wind farm. They knew that without witnesses or bodies it is tough to prove anything. So with their on site high security, gag orders in lease contracts and workers fearful of losing their jobs, it helped them to maintain this concealment.

But there still were some loose ends. In 1985, the same year the 10 -13 missing condors came to light, a bird mortality study at the San Geronio pass wind turbines was being conducted by a competent ornithologist named Michael D. McCrary. In 1986 he came

forward with his results. From his research he estimated that 6,800 birds were being killed annually by the 2947 turbines in this wind resource area. He also discovered that virtually all of the fatalities were smaller birds and that the turbines were killing nocturnal migrants.

These were astounding numbers and his report should have been an immediate red flag for the California Department of Fish and Game (DFG), the U.S. Fish and Wildlife Service (USFWS) and the California Energy Commission (CEC). The McCrary study should have prompted immediate follow-up studies at the three major wind resource areas in California about the impacts of the propeller style wind turbine. These wind resource areas were Altamont Pass, Tehachapi Pass and the San Geronio pass.

Instead the opposite took place. The research and study of the impacts from wind turbines came to a stand still.

Then in 1988 the California Energy Commission stepped in and funded a study to examine the extent of avian mortality at the three major wind resource areas in California. Even though the wind projects were being conducted with secrecy on private land, the public was becoming aware of the wind turbine impacts. Concern was building because word was coming in from the field about dead eagles and raptors with horrific injuries were showing up in wildlife rehab centers. This new study was an attempt to "document the reported" losses at each wind farm from November 1984 until April 1988. A period of 3 1/2 years. It was titled "Avian mortality at large wind energy facilities in California: identification of a problem" 1989 [P700-89-001.pdf](#)

When this report was written the number of wind turbines in California had almost doubled from the 1984 figure of 8500 to 15,000. The report even acknowledges that "since 1984 there has been a yearly increase in the reported incidents from the Altamont pass area". But it was downplayed with a statement that "it was unknown whether this results from an increase in collision incidents or an increase in reporting."

The McCrary study had already reported several years earlier that approximately 2.3 fatalities were occurring at each turbine per year or approximately 34.4 per MW at San Geronio pass wind turbines. Keeping those numbers in mind and using these same ratios for all of California, gives us a mortality figure of 34,000 mortalities for the 15,000 turbines in 1988 and 19,550 for the 8500 turbines in 1984. When the other year and a half is added to the total and adjusted for the changing turbine numbers, you would get approximately 40,000 additional fatalities.

By using the McCrary figures, there would be an estimated total of 93,950 avian fatalities for California from November 1984 up through April 1988.

At that time the wind industry knew they could never survive these fatality numbers because the public would not stand for it. So the 1989 California Energy Commission report, in an attempt to rewrite history, came to some startling conclusions and opinions about the fatalities at the three major wind recourse areas from 1984 -1988. They

claimed that " the purpose of the study was to document avian collision and electrocution incidents at wind energy facilities." But it really wasn't a study at all. It was nothing but a list of the wandering wounded raptors of documented incidents that had escaped the secrecy of California wind farms. These were the only incidents that could be proven by the outside world regarding what was happening around the turbines.

This study would mark the beginning of a new era of deception for the wind industry, the California Energy Commission and Government Wildlife agencies. Their study only revealed 72 incidents of avian fatalities involving wind generators and associated powerlines over a 3 1/2 year time period. Power lines were even given a portion of the blame in these 72 fatalities. Topping it off, all collision incidents occurred at only two of the wind resource areas in California, **nothing was reported from San Geronimo.**

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 Table 1. Reported avian collisions and electrocutions with wind turbine generators and power transmission lines at the Altamont and Tehachapi wind resource areas in California from November 1984 to April 1988.  
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Species	COLLISION			ELECTROCUTION	
	Altamont	Tehachapi	Total(%)	Altamont	Grand Total(%)
Golden Eagle	29	-	29(40.3)	2	31(28.4)
Red-tailed Hawk	21	7	28(38.9)	2	30(27.5)
American Kestrel	3	-	3 (4.2)	-	3 (2.7)
Great-horned Owl	-	2	2 (2.8)	-	2 (1.8)
Barn Owl	2	-	2 (2.8)	-	2 (1.8)
Ferruginous Hawk	1	-	1 (1.4)	-	1 (0.9)
Burrowing Owl	1	-	1 (1.4)	-	1 (0.9)
Unidentified eagle	1	-	1 (1.4)	4	5 (4.6)
Unidentified hawk	4	-	4 (5.5)	28	32(29.4)
Unidentified raptor	1	-	1 (1.4)	-	1 (0.9)
Total	63	9	72	36	108

Tens of thousands of birds and raptors had been killed by these new wind farms and this document was the best the CEC, the USFWS, and CA DFG could come up with. Looking back anyone should be able to see that the obvious purpose of this study was not to document avian collisions at wind farms, but was to say as little as possible about this problem.

In my opinion this 1989 study, report or what ever you want to call it, is mother lode of all bogus wind documents. **Even sadder, is the fact that the figures produced by this document have been quoted in deceptive studies and reports promoting the wind industry for over 20 years.**

The reality was that since 1984, eagles and other protected species were being slaughtered like never before in America. It was as if the Migratory bird treaty and the laws pertaining to the "take" of protected species had never been written. If they wanted , the USFWS and DFG could have pulled the trigger on this industry any time they wanted. It did not matter a bit that any of this was on private property. With these

agencies, if there is reason to believe wildlife violations are being committed, there are no fences.

In a perfect world, none of these the agencies would have dismissed the McCray study. Anytime they wanted to document what was really happening at the wind resource areas, they would have went to each of the wind farms to look for themselves. Then they would interviewed the hundreds of workers and security personnel that witnessed the bodies piling up. For workers, it would have been easy to see dead birds lying in the clearings around installed wind turbines . Workers and security driving around on the service roads that feed into every turbine (see images), would have seen plenty because large birds can be seen from several hundred yards away. Workers would have also been witness to the fact that these turbines were knocking down all types of birds. Not just raptors.



The USFWS, and CA DFG should have then demanded real studies. But they didn't. Instead they did what they are still doing for this industry. The upper levels of these agencies helped the wind industry cover up this problem. They did this by taking no action by not initiating any proper studies. However they did do something, they wrote a letter.

This supposedly bold action taken by the USFWS is even mentioned in the California Energy Commission study. "The concern of avian mortality on large wind farms has been renewed in recent years. In 1985 and 1986 the U.S. Fish and Wildlife Service (USFWS) received **several** reports of raptor mortality or injury from the Altamont Pass

Wind Resource Area. This prompted action by the USFWS in the form of a letter to all wind resource developers and operators in the Altamont Pass wind resource area informing them of the legal implications of causing death or injury to eagles and other raptors. In addition **their assistance was requested in investigating** the actual take of these protected species in the Altamont Pass Resource area. This action led to the support and cooperation of several Altamont Pass wind energy companies. **However this effort by the USFWS did not extend to the wind resource developers and operators in the Tehachapi Pass and San Gorgonio pass resource areas."**

As we all know, that letter did nothing for the ongoing carnage.

For the wind industry what the McCrary study really proved was that what happens at Altamont Pass is not unique. Everywhere birds are mixed with the propeller style wind turbines, they get slaughtered. But unlike Altamont where studies from 1998-2004 estimated mortality as high as 2,277 raptors and 11,520 birds killed each year, the McCrary studies not only showed higher numbers but also showed a much higher percentage of small birds being killed. (Insert Bluebird image)

I have looked over all the studies produced from Altamont and all have serious flaws. If the true numbers of small birds being killed were added to the mortality reported from Altamont pass, there would be at least 2-3 times more fatalities. In other words at least 25,000 birds per year. One of the primary reasons for the flawed mortalities figures coming out of Altamont is a result of the studies being conducted on 30-90 day cycles. These studies are missing most of the smaller birds and bats. To find these smaller species, mortality searches must be conducted on a daily basis to keep up with the multitude of ravens, gulls, and mammals that are eating them.

Conducting searches on a daily basis will also serve another useful function. It would keep researchers ahead of the worst scavengers of all, **wind industry personnel**. Security and maintenance workers would then not be able pick up the bodies of highly sensitive species. Important rare species like peregrine falcons, white-tailed kites, condors, and whooping cranes, could then be reported instead of hidden.

If anyone thinks that this is not going on within the secure boundaries of wind farms, then consider these facts. The only peregrine falcon ever found killed and reported at Altamont Pass was during a mortality study being conducted on a 2 day search cycle. This same study also recorded the highest mortality ever for Altamont Pass because researchers were getting to more of the smaller birds

It is also my belief from my research, that the McCrary 1986 study from San Gorgonio Pass study has never been given to Congress by the California Energy Commission when many other worthless wind industry studies have.

Yes, the industry today now admits to more fatalities at 2.9 per MW but this is still 12 times less than the 34.34 fatalities per MW reported in 1986 by McCrary. The low 2.9 per MW figures have been deliberately cooked up by the industry. It has been done by

using industry approved grossly undersized search areas and studies that do not look for fatalities on 1 day search cycles. They also do not use trained dogs because with trained dogs far more birds and bats would be found in a fraction of the time. The industry is well aware of all of this.

Today there are USFWS voluntary guidelines currently in place for the wind industry and they have been there all along. From the very beginning this industry has never been required to say or report anything of substance. As anyone can see from the information I have presented in this report, this is what you get with **volunteer guidelines**. We are lied to. Today all the same problems that existed in the 1980's, are still with us. The industry still continues to operate their wind farms like Area 51 in Nevada and they generate any of the needed paperwork to keep things that way.

I can not bring back the millions of birds killed by this industry. I can not undo what has already been done. But I can educate people to this very real and growing problem. Millions of birds being killed by this expanding industry and it is going to get a lot worse. This is not a problem about English Sparrows and Starlings; it is about hundreds of other species that need the habitats where these turbines are being placed. **They can not coexist with these turbines and never will.**

My intention with this report is for the public to understand the path this industry has always taken. Then by using this knowledge the necessary changes can be facilitated. If nothing is done, the rapid expansion of the wind industry will absolutely bring about the extinction of several bird species and forever change the remaining bird populations on this planet. Society can not wait for the wind industry to come clean and move away from their propeller style wind turbine. It may never happen.

But the public can force this to happen with enough support. A good place start would be for some ethical USFWS mandatory guidelines and for the public to end the wind industry tax credits.

### **Audubon Society Helps USFWS Whitewash Wind Industry Slaughter**

On March 23, Interior Secretary Ken Salazar and the USFWS released new guidelines designed to help wind energy project developers avoid and minimize impacts of land-based wind projects on wildlife and their habitats. In his press release he stated "We believe these consensus guidelines hold great potential as a roadmap toward collaborative, science - based solutions to bird and wildlife conflicts with wind development across the country. The voluntary guidelines will help shape the smart siting, design and operation of the nation's growing wind energy economy".

The problem with Ken Salazar's statement is that it is deliberately deceptive and his words are empty. The guidelines on the surface appear to have **potential**, are **voluntary**

and they will definitely help the financial institutions and oil companies behind **our wind energy economy**. But the new guidelines also have another much more important purpose that he did not mention. They were meant to create the appearances of solving the ongoing industrial bird and bat carnage caused by the wind industry. Ken Salazar's statement and the new guidelines represent nothing more than the same song and dance that has taken place since the 1980's. Just tell the public whatever they want to hear, and keep on building.

Nothing will be solved with the new guidelines because they only have **potential** and are **voluntary**. They will do nothing for the millions of birds and bats slaughtered each year by this industry. Investors will be pleased because it now looks like things will be even easier for the industry.

On April 12 the National Audubon Society sent out an Advisory to their members celebrating these new guidelines. Guidelines that the National Audubon Society, The Nature Conservancy, Defenders of Wildlife, Massachusetts Audubon, and Bat Conservation International helped to create. That is why I am putting out my own Advisory. I am advising everyone to remember of those involved because these new guidelines are a disgrace in every sense of the meaning.

It is hard to imagine any wildlife organization signing off on this ongoing industrial slaughter of birds. This is especially true for the National Audubon Society.

One of the most disturbing parts of the so called Regulations concerns **“eagle take permits” – i.e. licenses to kill eagles**. In 50 CFR 22.26 and 50 CFR 22.27 it allows for compensation as part of permit issuance. Who gets the pay out for the dead eagles? The Conservation groups listed above? **No one and no group should ever profit from dead eagles.**

The USFWS claims "These voluntary Guidelines provide a structured, scientific process for addressing wildlife conservation concerns at all stages of land-based wind energy development". This is far from the truth. I read over the guidelines and most of the information given for justifying the guidelines is based on the pile of bogus research created by the wind industry. These Guidelines still leave the wind industry with no transparency and no regulations. But worst of all wind industry actions are still voluntary just like they have always been. The industry still does not have to tell the truth and there are no consequences.

With real wind industry Guidelines or Regulations we would not be hearing the word potential. We would be hearing the word mandatory. With real guidelines the bogus mortality studies currently staged by the wind industry would not be tolerated. Instead they would demand that proper mortality studies be conducted with adequate sized search areas with searches done on 24 hour cycles. This way far more of the bird and bat mortalities could be located.

Real guidelines would address the wind industry's clear history of profit bias associated with their bogus studies. The industry could then be stopped from controlling their own mortality studies. Real guidelines would create transparency instead of concealment with actions like nondisclosure clauses written in wind industry contracts. Real guidelines would not put up with the hiding of carcasses.

But most of all, real Guidelines would address the cumulative impacts from the increasing yearly slaughter caused by this industry. The whooping crane is a perfect example. Their small fragile population has stopped increasing after decades of growth. Since 2007 more of them are now dying each year along their turbine infested migration route to Texas.

It would also seem that all this information would be very important to the USFWS so they would have a much better understanding of the true impacts caused by this industry.

Thankfully not all Audubon members feel the same way about the wind industry. Several local Chapters of the Audubon Society around Altamont Pass and Kenedy Ranch in Texas, sought legal action to stop the wind industry slaughter to protected species.

Instead of holding hands with greedy investors, these two groups were involved in litigation that was actually meant to help the many bird species in trouble. The local chapter of the Audubon Society in Kenedy County sued to try to stop the Kenedy Ranch wind projects and the Bay Area Audubon Chapters trying to slow down the tens of thousands of birds being killed each year at Altamont.

Both failed in their attempts. Mortality has not gone down at Altamont and massive wind turbines were installed in one of the most critical bird habitats in North America.

It is unfortunate I was not in contact with the Audubon Chapter in Kenedy County. Had they known what I have disclosed about the wind industry's bogus mortality studies and what I am about to discuss, they may have been able to stop them.

What makes the location of the Kenedy Ranch wind farm so critical is the numbers and diversity of birds found in the area. This is a region with far greater densities of birds and bird species than the Altamont pass region. This region is an extremely important stop over for millions of migrating birds in the central united states including the whooping crane. More than 300 different species of birds have been recorded on the Kenedy ranch and many more that use the shore line habitats and Gulf wind currents.

For the birds you could not pick a worse location to put the propeller style wind turbine, but for the investors, it's just another pot of taxpayer gold.

Sadly there are now 286 huge 2.4 MW wind turbines located along the coastal habitat of the Gulf coast and the wind industry gold diggers are planning many more for this region. Each of these turbines equals 45-50 of the mid 1980 's Altamont turbines.

**The Kenedy ranch is a classic example of just how out of control the wind industry really is. It also represents why this country so desperately needs real wind industry regulations.** A comparison of facts with Altamont Pass and this newer wind resource area in Texas should help to wake up a few people about the madness pertaining to "Voluntary Guidelines".

After more than 20 years of operation it has finally been disclosed in mortality reports that the yearly death toll at Altamont Pass is estimated to be around 10,000 birds annually. This wind farm is also considered to have the highest wind turbine bird mortality in America. As high as these estimates are I believe there are at least 2-3 times more fatalities per year.

Recent studies from Altamont proved that the new larger turbines being installed there are killing more of the indigenous species per MW in the habitats where they are installed. These studies conducted in the semi desert grasslands of the Buena Vista section of Altamont showed that 11 bird species and 2 bat species were being killed at a higher rate per MW. This included more dead eagles, more dead prairie falcons, and more dead horned larks. This was never been disclosed by the industry. Instead this was hidden in a mountain of meaningless data and the new larger turbines were celebrated as being safer for "all birds".

There is something else that has never been disclosed about Altamont that clearly points to how inept all the Altamont studies have been over the years. That being the reported bat mortality. Each year thousand of birds have been reported killed but only about 35 bats. These numbers are impossible and are probably off by more than 100 times. This also illustrates my point about the fatalities being much higher at Altamont. If they are missing so many bats, they have to be missing the majority of small birds.

But even with all the severely flawed mortality studies, we all know the Altamont pass wind resource area kills a lot of birds and bats. It has been widely publicized. What people do not know is that the Kenedy ranch is probably killing far more. Here is why.

The coastal region of Texas has more local and migratory birds than the Altamont Pass region. About 20 year ago Biologists for the USGS conducted field surveys within the Coastal Sand Plains in Brooks, Jim Wells, Kenedy, and Kleberg counties in southern Texas. There surveys were done during 1991-1992 and 1992-1993. In these Coastal grassland surveys they found high densities of about 30-50 birds per 10 hectares or 750-1250 birds per square mile. This is at least 5 times the birds that to be found in the foothills around Altamont pass. I know because I spent years in the field around the Altamont pass region.

Most readers will also be surprised to know that these enormous turbines in this important bird sanctuary have a combined rotor sweep of around 22 million square feet. So not only are there far more birds living around the Kenedy Ranch, this wind farm is also larger than the Altamont Pass wind farm. All the smaller turbines at Altamont do

not add up to the size of these huge turbines. Their blades also spin faster than most of the wind turbines at Altamont Pass, with tip speeds up to 188 mph.

There is also another fact about the turbines on the Kenedy Ranch that make them more dangerous. They spin far more hours each year because they can start turning in slower winds. In other words they have lower cut in speeds.

The Kenedy Ranch wind farm is without question, a far more dangerous wind farm and there are far more birds at risk in the habitat.

Now let's analyze the wind industry mortality surveys that have come out from the Kenedy ranch. The mortality studies from the turbines on Kenedy ranch are reporting only about 2000 deaths per year or about 5 times fewer than Altamont pass. These figures are about as honest as the new guidelines.

**But none of this matters because for the wind industry, telling the truth is "Voluntary".**

More so than at any other wind farm in America, someone needs to get on this ranch and conduct proper mortality studies. These should be done on a daily basis with dogs and have search areas of at least 200 meters around each of these huge turbines. Without question, proper studies would put the original Kenedy ranch mortality reports in the dumpster. And if they were done, the world would likely discover that this wind farm is killing far more birds than anywhere else in North America.

The latest "**Make Believe Guidelines**" are really nothing to be proud of and there is no cause to celebrate. As far as I am concerned this entire collaboration with the heads of the USFWS, National Audubon Society, Nature Conservancy, Defenders of Wildlife, Massachusetts Audubon, and Bat Conservation International was nothing more than an abuse of power and a total betrayal to their respective members.

[http://www.audubonaction.org/site/News2?abbr=aa\\_&page=NewsArticle&id=5509#wind](http://www.audubonaction.org/site/News2?abbr=aa_&page=NewsArticle&id=5509#wind)

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