

Save Our Scenic Hill Country Environment, Inc.
LCRA TSC EIS Scoping Process Comments
April 27, 2010
Fredericksburg, Texas

My name is Robert Weatherford. I am the president of Save Our Scenic Hill Country Environment . Many of our more than 500 members will be affected by the proposed LCRA TSC transmission lines. More information on SOS Hill Country can be accessed from our website at soshillcountry.org.

Industrial wind and the CREZ transmission line developments are obviously linked through the 2005 legislative mandates. The EIS must consider the cumulative impacts of both.

The increased renewable energy mandate is being easily met primarily by industrial wind development. One key reason is that there is virtually no state regulation of industrial wind development. This lack of regulation includes environmental considerations.

Regarding transmission lines, the Texas Parks & Wildlife Department has no authority pertaining to wildlife concerns.

This vacuum of state regulation clearly demonstrates the necessity that U.S. Fish & Wildlife Service fully consider not only endangered species protection but the effects on other resources as outlined in the Federal Register notice. These resources include wildlife, cultural resources, land use and local economy among others. Many of these resources are essential to the Hill Country with the area being unique in its scenery and its attraction to visitors as well as those that live here.

The notice indicates that LCRA TSC is expected to request permit coverage for a period of 30 years. This length of time is clearly unacceptably too long due to the additional development of industrial wind that is possible. As an example, ERCOT shows that there is an Interconnection Study underway for a 170 megawatt wind energy project in Mason County with a Commercial Operation Date of December 2010. The project would have many of the same effects as the transmission lines and the cumulative impacts would be significant.

LCRA TSC transmission lines alone will significantly impact resources listed in the notice. Alternatives that should be considered include not routing the lines through the Hill Country at all to eliminate damage to local economies. The cumulative impacts of the recently constructed Horsehollow Generation Tie transmission line through the Hill Country should be taken into account.

Mitigation steps should include transmission line routing that utilizes existing electric right-of-way where possible in unpopulated areas. Utilization of the already affected Interstate 10 corridor should be fully considered. LCRA TSC should work closely with landowners to minimize the effects on their land use.

LCRA TSC should utilize monopole, rather than lattice structures, throughout to reduce the aesthetic impacts and effects on local economy and land use.

Regarding wildlife, the impacts on endangered and additional species should be thoroughly evaluated and fully mitigated. Impacts on other key species must be considered. These species include the Mexican Free-tailed Bat which is important to local economies.

In summary, the EIS must fully consider and eliminate or mitigate all of the impacts of the CREZ transmission lines and related wind development.