

Save Our Scenic Hill Country Environment, Inc.
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Great Plains Wind Energy Corridor EIS Scoping Comments
October 12, 2011

The following comments are being submitted on behalf of the approximately 600 members of Save Our Scenic Hill Country Environment (SOSHCE). A large number of our members are landowners in Gillespie and Llano counties in the Texas Hill Country. Significant parts of those counties are in the proposed area to be included in the Great Plains Wind Energy Corridor (GRWEC) Environmental Impact Statement (EIS)/Habitat Conservation Plan (HCP)/Incidental Take Permit (ITP).

In general, we strongly support development of EIS/HCP/ITPs for industrial wind projects. Those projects can have significant impacts for decades on a number of endangered, threatened and other species over very large areas. As an example, the Roscoe Wind Farm, one of many in Texas, covers almost 100,000 acres or more than 150 square miles.

Due to the uniquely large number of species and vast areas involved, industrial wind development EIS/HCP/ITP's should be species, area, project, developer and operator specific. These considerations support the No Action Alternative.

If it is decided to proceed with a blanket approach in spite of the preceding considerations, it would appear that the Umbrella HCP structure would at least have continued U.S. Fish & Wildlife Service (USFWS) involvement during the implementation of the HCP. The other structures clearly fall short of the level of USFWS involvement that is justified based on the magnitude of the proposed action.

As a condition for a blanket HCP/ITP approach, the permittees should be required to comply with the USFWS Land-Based Wind Energy Guidelines which are nearing finalization.

The Guidelines support the need for individual project consideration through such statements as shown on page 7 of the September 13, 2011, draft which states "Substantial variability can exist among project sites and as such, methods and metrics should be applied with the flexibility to address the varied issues that may occur on a site-by-site basis, while maintaining consistency in the overall tiered process." On page 119, in the definition of "Significant", it is stated "For purposes of impacts to species of concern and their habitats, as used in these Guidelines, significance will be determined in the context of the degree to which each individual project affects the particular locality and region. The determination will focus on the degree to which the project is likely to affect the long-term status of the population(s) of the affected species of concern. Short-term, long-term and cumulative effects are relevant."

Consistent with the USFWS guidelines and with EIS requirements, the cumulative impacts of the potential large number of industrial wind projects should be clearly addressed in the EIS/HCP/ITP. The impacts of the associated transmission system additions must also be taken into account.

The development of Species Take Avoidance Measures (STAMs) for the large number of species listed should get the same level of scrutiny as for the four publicized species (whooping crane, lesser prairie-chicken, interior least tern and piping plover). The STAMs should be consistent with HCP/ITP's that have been issued for the various species in the past. As a specific example, the STAMs for the golden-cheeked warbler and the black-capped vireo should require avoidance of any habitat for those species.

The anticipated 45 year permit duration is too long based on uncertainty and should be significantly shortened to be more consistent with existing EIS/HCP/ITP's.

Permittees should also be required to publically disclose data on fatalities of all species of concern including bats which are of particular importance in the Texas Hill Country.

It is not clear why the "Why Wind Energy" poster was included in the materials presented at the scoping meetings and is posted on the USFWS GPWEC website. In any case, there are several other important considerations that should be noted as follows.

- The vast transmission system that is required must be recognized. In Texas alone, the Competitive Renewable Energy Zone (CREZ) transmission system is now expected to cost \$6.79 billion. While the final costs are not yet known, the initial estimate in 2007 was \$4.93 billion. At least two of the Transmission Service Providers that are involved in constructing parts of the system are pursuing EIS/HCP/ITPs due to the magnitude of the impacts that the transmission system additions will have.
- Energy production from wind generation is highly variable. On average, wind farms produce at significantly less than capacity. In addition, the availability of inland wind energy does not match peak demand requirements at least in Texas. The Electric Reliability Council of Texas (ERCOT), the electric grid operator for most of the state, plans on only 8.7% of wind generation capacity in its peak load balances. The wind tends to blow less in hot summer months when air conditioning-related peak demand is the highest. Other non-wind generation sources must be available to make up the shortfall.
- Evaluation of the reliability implications of integration of high levels of wind generation in Texas is one of the key issues to be determined by ERCOT as follow-up to the Long-Term Transmission Analysis, 2010-2030, Interim Report which was published on September 2, 2011.
- Industrial wind energy development is highly dependent on the use of governmental subsidies. In the ERCOT Interim Report Business As Usual scenario without the Federal Production Tax Credit (PTC) continuing, there was no additional industrial wind generation installed after the year 2014. On a national basis, the significant reduction in wind energy development that has occurred when the PTC has expired is well documented.
- In Texas, wind developers have also had available property tax incentives that are intended to encourage investment and job creation through the Texas Economic Development Act (Chapter 313 of the Tax Code). However, in the Texas State Comptroller's December 2010 report on the act, one of the recommendations was to "Modify the requirements pertaining to renewable energy projects, with targets and benefits that more closely correlate to those projects." It was stated that "Renewable energy projects are projected to receive 38 percent of the projected lifetime tax benefits from Chapter 313 but only make up 27.6 percent of committed investments and eight percent of committed jobs." Of the total 6,239 number of qualifying jobs recipients committed to create over the life of project agreement, Wind Renewable Energy Electric Generation accounted for 446. This resulted in an estimated gross tax benefit per committed job over life of the project agreement of almost \$1.6 million per job for wind as compared to less than \$200,000 for manufacturing and for research and development.

In closing, we request that our comments be seriously considered in light of the potentially significant impacts that the proposed EIS/HCP/ITP will have on such a massive scale on biological resources, land use, air quality, water quality, water resources, economics and other environmental/historical resources.

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President