



Bringing back the birds

Tristan Grimbert
President and CEO
EDF Renewables
15445 Innovation Drive
San Diego, CA 92128

October 20, 2017

Dear Mr. Grimbert:

I am writing again to express American Bird Conservancy's (ABC's) serious concern over EDF Renewable's proposed Vista Mountain Wind Power Project in the sensitive Texas Hill Country/Cross Timbers region (in Hamilton, Coryell, Lampasas and Mills Counties) and associated high voltage lines and towers to connect it to the existing grid. This is the second letter we have written; the purpose of this correspondence is to point out some additional concerns.

ABC is a 501(c) (3) not-for-profit membership organization whose mission is to conserve native birds and their habitats throughout the Americas (www.abcbirds.org). ABC acts by safeguarding the rarest species, conserving and restoring habitats, and reducing threats, while building capacity in the bird conservation movement.

ABC is a proponent of Bird Smart Wind Energy, which is described in some detail in Hutchins et al. (2016). Careful wind generation siting is crucial in preventing unintended impacts to native bird and bat species. ABC is concerned that the proposed Vista Mountain Wind Power Project and its associated power lines and towers pose an unacceptably high risk to protected U.S. wildlife. This is especially true, as we have become aware that there are other proposed and existing wind energy facilities in this ecologically sensitive area, including the Priddy, Goldthwaite and Flattop Wind Energy Projects. As such, the cumulative impact of any future development on wildlife becomes an important issue. As you may know, the National Environmental Policy Act (NEPA) requires that cumulative impacts be taken into consideration during pre-construction risk assessments. This argues for a full-blown Environmental Impact Statement (EIS), not a cursory Environmental Assessment (EA).

The presence of Threatened and Endangered species in the area, such as the Whooping Crane, are also of great concern to us as a bird conservation organization. We recently conducted a study of Whooping Crane stopover sites (Moore et al, 2017), overlaying them with existing and proposed wind turbines and power lines and towers. The current siting of wind turbines probably poses limited threat to this species; however, the power lines and towers are another story. Collisions with power lines and towers are a major killer of cranes worldwide (Morkill and Anderson, 1991, Janss and Ferrer 2000, Sundar and Choudhury 2005, Shaw et al. 2010, Stehn and Wassenich, 2008, Wright et al. 2009). Thus, the new power lines and towers you propose to connect your facility to the existing grid may increase the risk to this species in its Migratory Corridor. Subsequently, approval of this project will require Section 7 consultation under the Endangered Species Act and a full-blown Environmental Impact Statement (EIS). This should be based on at least three years of pre-construction risk studies, all of which should be done by independent experts (not paid consultants to the industry) using standardized methods.

Thank you for your consideration of ABC's views. ABC will be watching this proposed project and reviewing any risk assessments produced very carefully.



Shaping the future for birds

Sincerely,

Michael Hutchins, Ph.D.
Director, Bird-Smart Wind Energy Campaign

Cc: William Osborn Esq, Texas State Representative Scott Cosper, Texas State Senator Dawn Buckingham, Texas House Representative J.D. Sheffield, Kevin Mote TPWD, Chris Harper, TPWD, Shaye Lewis Mills County Judge, Brian L Dosa Fort Hood, Sheila Williams Evant ISD President, Brady Roundtree Mills ISD, Judge Firth Mills County Judge Firth, Hamilton County Judge Tynes, Clay Tarpley Hamilton ISD Superintendent, Johnnie Smith TPWD, TP Medlock Hamilton ISD President, Brenda Andrews Hamilton ISD, Randy Lee Hamilton ISD, Charlette Boyd Hamilton ISD, Kasey Kunkel Hamilton ISD, Keith Gatewood, Hamilton ISD, Jon Lengefeld Hamilton ISD, Randy Lee Hamilton ISD, Johnny Wagner Hamilton County Commissioner, Dickie Clary Hamilton County Commissioner, Lloyd Huggins Hamilton County Commissioner, Keith Curry Hamilton County Commissioner, Kyle Mathews Coryell County Commissioner, Daren Moore Coryell County Commissioner, Don James Coryell County Commissioner, Ray Ashby Coryell County Commissioner, Jerome Ford, Assistant Director, Migratory Birds, U.S. Fish and Wildlife Service

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