

Date: May 29, 2014

To: Lance Wenmohs, Manager, Siting & Certification
Lower Colorado River Authority (LCRA)
Lance.wenmohs@lcra.org

From: Christy Muse, Executive Director
Hill Country Alliance
512.560.3135 | Christy@hillcountryalliance.org

Dear Mr. Wenmohs;

Please consider the following comments related to the planning, construction and maintenance of the proposed Blumenthal substation and associated 138-kV transmission line.

The proposed transmission line could impact three major catchment areas in Texas Hill Country: the Pedernales River watershed, the Blanco watershed, and/or the Upper Guadalupe River watershed. Each of these basins supports high levels of biodiversity, including endemic species found nowhere else in the world. The diverse habitats across these three basins are critical to a variety of species of conservation concern, including canyon mock-orange, swamp rabbit, and breeding populations of federally endangered Black-capped vireo and Golden-cheeked warbler.

The land that drains into these rivers also supports a rich heritage of agriculture, hunting, fishing, ranching and a vibrant tourism industry. Visitors from around the country and around the world flock to this region for the scenic vistas, the historic sites, and to visit the budding vineyards that are thriving in these watersheds.

The Hill Country Alliance (HCA) understands the need for the new substation and transmission lines to provide reliable electricity to the rapidly expanding U.S. 290 corridor in eastern Gillespie County. As the LCRA and CTEC begin the difficult process of locating this new infrastructure, consideration should be given to aesthetic, economic and environmental concerns, including:

1. **Routing and Substation Location:** The least damaging transmission line route and substation location should be chosen. Priority should be given for preserving the scenic views and aesthetic values, avoiding cultural, historical and archaeological sites, avoiding habitable structures, and avoiding land fragmentation through the construction of new easements across undivided landscapes. In addition, every possible effort should be made to avoid environmentally sensitive areas including riparian areas, steep slopes, flood plains and threatened endangered species habitat—including modeled potential habitats for the species listed both federally and on the state's list of species of conservation concern. No clear-cutting of vegetation should occur in highly sensitive and erodible riparian areas. In protecting land from fragmentation, special consideration should be given to parks, public spaces and areas

protected under conservation easements. These lands have been set aside from development to be maintained as open space for future generations, and every effort should be made to honor those protections. LCRA recently announced the creation of an LCRA Land Trust to “provide stewardship of conservation easements in the Colorado River basin.” As we encourage landowners to voluntarily protect valuable land in the Colorado basin with conservation easements, we must also honor their commitment with assurance that utility easements won’t degrade what they’ve sacrificed to protect.

2. **Construction and Design of Substation and Transmission Line:** Care should be taken to minimize the damaging effects on native habitat and scenic beauty during the design and construction of both the substation and the transmission line. The transmission line should use minimalist construction such as monopoles whenever possible. The timing of construction of the line should consider Golden-cheeked warbler breeding season as well as the oak wilt season. Construction protocols should include plans for the prevention of spread of invasive species including, but not limited to, King Ranch Bluestem and *Arundo donax*. In areas where clearing occurs, efforts should be undertaken to re-establish native grasses and ground cover. Lighting of the substation and tie-in points should be sensitive to light trespass, and should include full cut-off shielding, the avoidance of glare, and the use of a breaker switch rather than all-night lighting.
3. **Maintenance and Long-Term Impacts:** The construction and execution of a new substation and transmission line should include a long-term maintenance plan that presents a clear plan of action to sustainably maintain the easement areas in perpetuity. Every effort should be made to minimize the use of herbicides, to protect surrounding vegetation from incidental damage, to restore easement areas for the prevention of runoff and to ensure the viability of native plant species. Clear cutting in environmentally sensitive areas must not occur.
4. **Fair Compensation:** HCA promotes fair compensation for any land conveyed for the construction of this project.
5. **Open and Transparent Process:** HCA advocates for the thoughtful, inclusive engagement with all landowners, stakeholders, businesses and organizations that may be impacted by this project. These stakeholders should be engaged not only in the planning phases, but also in the design, construction and implementation phases. Advance notice should be given during any decision making process, and clear and open lines of communication should be maintained.

The Hill Country Alliance is dedicated to ensuring for future generations an opportunity to enjoy the unique features of the Hill Country region, including countless spring-fed streams, multi-ethnic and agricultural heritage, and spectacular scenic beauty.

HCA’s Guiding Principles:

Encourage responsible water practices – A key to solving our region’s challenges is to work collaboratively with all interested stakeholders in order to make readily available honest and fair information, along with opportunities for participation in decisions.

Inform the friends of the Hill Country – A key to solving our region’s challenges is to work collaboratively with all interested stakeholders in order to make honest and fair information readily available, along with opportunities for participation in discussion.

Nurture unified support for innovative policy changes – While the actions needed to sustain the Hill Country’s natural features vary across the region – from the rapidly urbanizing southern and eastern portions, to the vast open spaces on the western and northern edges – there is a shared interest in respecting private property rights and encouraging locally grown solutions to complex issues through education.

Support economic development that is compatible with the Hill Country’s unique features – A key to keeping our Hill Country a special place for generations to come is to promote sources of income for landowners and businesses so that ensuing generations are motivated to keep ranches intact and small towns functional.

These guiding principles greatly influenced our comments regarding the LCRA and CTEC transmission project for Blumenthal. While we appreciate that economic growth in eastern Gillespie county demands enhanced power supply to that area, we urge the LCRA, CTEC and the PUC to undertake all possible precautions in identifying the least environmentally and economically damaging route possible, undertaking design, construction and maintenance in forward-thinking and sustainable ways, and in engaging all impacted community members throughout the entirety of the process in open and honest dialogue. It is far too easy in these discussions to see neighbors pitted against neighbors in a not-in-my-backyard battle. The LCRA and CTEC can and should take a proactive approach in mitigating those conflicts.

I appreciate the opportunity to offer the Hill Country Alliance’s comments on the proposed Blumenthal Project and would be happy to answer any questions you may have.

Sincerely,

A handwritten signature in black ink, appearing to read "Christy Muse". The signature is fluid and cursive, with the first name being more prominent.

Christy Muse
Executive Director
Hill Country Alliance