

Sandoval, Melanie A., PRC

From: Dzur, Stephanie, PRC
Sent: Monday, November 27, 2017 7:18 PM
To: Amy Miller
Cc: Sandoval, Melanie A., PRC; Hall, Cynthia, PRC
Subject: Re: Letter Concerning the Proposed Sagamore Wind Farm

Amy,

Thank you for the input from the Nature Conservancy on the Sagamore Wind Farm. I am forwarding your comments to be filed in this case.

Sincerely,

Stephanie Dzur
Executive Assistant to Vice-Chair Hall
Stephanie.Dzur@state.nm.us
Phone (505) 235-8013

From: Amy Miller <amy.miller@TNC.ORG>
Sent: Monday, November 27, 2017 4:34 PM
To: Hall, Cynthia, PRC; Dzur, Stephanie, PRC; Lyons, Patrick, PRC; Bransford, Deborah, PRC; Espinoza, Valerie, PRC; Lovejoy, Lynda, PRC; Cordero, Andre, PRC; Jones, Sandy, PRC; Hirasuna, Robert, PRC; Archuleta, Ernest D, PRC; Smith, Michael C, PRC; Martinez, Marc, PRC; Sandoval, Melanie A., PRC
Cc: Terry Sullivan
Subject: Letter Concerning the Proposed Sagamore Wind Farm

Good afternoon Commissioners, The Nature Conservancy is submitting the letter pasted below expressing some concerns regarding the proposed Sagamore wind farm in southeastern New Mexico. Please feel free to contact us for any further information or questions.

Amy Miller



November 27, 2017

New Mexico Public Regulation Commission
1120 Paseo de Peralta
Santa Fe, NM 87501

Re: Case #17-00044-UT, Case 17-00275-UT

Dear New Mexico Public Regulation Commissioners,

I am writing to share our views regarding the proposed Sagamore Wind Farm in southeastern New Mexico. You may have seen a recent article in The New Mexican where we recently expressed some concerns regarding the proposed footprint of the Sagamore facility. Our primary concern regarding the proposed Sagamore facility is the overall siting of the facility, which is adjacent to The Nature Conservancy's Milnesand Prairie Preserve, and the placement of the facility's turbines.

As you may know, The Nature Conservancy is a science-based, non-partisan organization that focuses on developing and implementing pragmatic solutions to address conservation challenges both for people and for nature. We have been in the state for almost 40 years, focusing on protection of land and fresh water and are also engaged in energy, climate and urban conservation issues.

The Nature Conservancy fully supports renewable energy development, when it is appropriately designed and sited, which we recognize is critical to reduce carbon emissions which are already having a profound impact on our state. We also value, support and recognize the rights and values of private landowners and businesses in managing their lands and financial interests. However, the totality of environmental impacts and benefits from renewable energy goes beyond clean air. As such, we are encouraging utilities, such as Xcel Energy, and developers, such as Invenergy, to be more proactive, collaborative and transparent in their siting processes, taking environmental impacts into serious consideration earlier in their analyses. Therefore, we encourage the PRC to use its regulatory authority to encourage these considerations before a site proposal is developed.

The proposed location of the Sagamore facility is situated within the core remaining occupied habitat of the lesser prairie chicken in New Mexico. The prairie chicken population has experienced a dramatic decline over the last 100 years due to a variety of human activities, suppression of natural fire, energy development, and conversion of prairie grasslands to irrigated agriculture. Scientists recognize that there could be profound negative impacts on prairie chicken populations as a result of the construction of wind turbines. Prairie chickens associate vertical structures with raptor perching and consequently avoid what would otherwise be suitable habitat for a substantial distance from power lines and turbines. Multiple public agencies and private partners have been working for more than a decade to reduce the likelihood of the federal government listing the bird as an endangered species, which would potentially impose significant land use restrictions on landowners and land managers.

The Nature Conservancy's Milnesand Prairie Preserve is the center of the occupied habitat of areas for the state's remaining lesser prairie chicken population. The Preserve also provides habitat for other species including the imperiled dune sagebrush lizard, black-tailed prairie dogs, burrowing owls, plains leopard frogs and a host of other prairie species. The grasslands found in this region of New Mexico are generally regarded as one of the most endangered ecosystems in North America.

Since initial land purchases in 2005 and 2009, The Nature Conservancy has continued to make significant investments in the 28,000-acre Preserve and prairie chicken conservation. The preserve provides superb unfragmented grasslands with oak shrubs, which provide protective cover for these ground nesting birds. The preserve is managed for its conservation values while maintaining a sustainable livestock ranching operation. Our collaboration and partnerships with other ranchers and federal and state wildlife agencies has improved the lesser prairie chicken's prospects for recovery.

The Nature Conservancy only learned about the proposed Sagamore Wind Farm when it was announced in the media in early 2017. We immediately expressed our alarm that the proposed placement of wind turbines in proximity to the Milnesand Preserve will fragment habitat and isolate the prairie chicken populations. We subsequently sent a letter to Xcel Energy expressing our concerns.

We recognize and appreciate that Invenergy, the developer of the project, has met with us twice to discuss the proposed project. Unfortunately, despite the fact that we could have provided data and recommendations which could have been beneficial to the siting process for the facility, no siting consultation had occurred until the project developer had already negotiated land use agreements with private landowners. As part of our efforts to preserve the prairie chicken, the Nature Conservancy monitors the bird populations and their leks. It was clear in our meetings that our scientific data does not match the limited lek data being cited by Invenergy, who surveyed the area via helicopter.

Pursuant to those conversations, it appears that some potential siting modifications may have been made by Invenergy to the plans which could shift some of the turbines away from the Milnesand Preserve. However, based upon the current information available, it is not at all clear that the turbines will be sited appropriately to allow for the continued health of the lesser prairie chicken population within the surrounding landscape. At this time, The Nature Conservancy cannot support the proposed Sagamore wind farm until we have more specific information on the locations of the turbines.

We thank you for your consideration of our comments. Please do not hesitate to contact me or Amy Miller, our external affairs director, for further information on these concerns.

Sincerely,

Terry Sullivan
State Director
The Nature Conservancytsullivan@tnc.org

Cc: Amy Miller, External Affairs Director, The Nature Conservancy, 505-269-0287

Please consider the environment before printing this email.

Amy M. Miller
Director of External Affairs
amy.miller@tnc.org
(505) 269-0287 (mobile)

The Nature Conservancy
New Mexico Field Office
200 Broadway NE
ABQ, NM 87102



nature.org/abq

Pena, Sarah, PRC

From: sam southard [blkcattle@gmail.com]
Sent: Monday, November 27, 2017 2:49 PM
To: Pena, Sarah, PRC

Wind farm Portales nm. My south place was took out for prarie chickens. I have more in hay fields and grain
Birds feeding the middle of invenorgy planed project Go with abundant natural gas. Save our birds and pocket
book. 3 cents vs 21 for wind. Nothing environmental about wind. I am a pilot ,been eatching wild pigs and
hundreds prarie chicken.Thanks sam southard elida nm



New Mexico State Senate

State Capital
Santa Fe

COMMITTEES:

MEMBER:
• Conservation
• Education

SENATOR PAT WOODS

R-Curry, Quay & Union-7

4000 CR M.
Broadview, NM 88112

Home: (575) 357-8594
E-mail: pat.woods@nmlegis.gov

January 4, 2018

Melanie Sandoval, Records Bureau Chief
New Mexico Public Regulation Commission
1120 Paseo De Peralta
PERA Building
P.O. Box 1269
Santa Fe, NM 87504

Re: Case Number 17-0025-UT, Sagamore Wind Project

The purpose of this letter is to express my support for the proposed Sagamore Wind Energy Project that Invenergy, LLC. is developing in Roosevelt County. This is a \$865M project that will produce 522 megawatts of power and power approximately 193,000 homes. There will be over 200 construction jobs and over 20 full time employees that will have advanced technology jobs.

I understand that the project does not plan to apply for an Industrial Revenue Bond, therefore the project will pay the full amount of gross receipts and property taxes to the State and Local Governments. If we add the payments to landowners this could total \$5M annually.

I am a strong supporter of wind development in New Mexico because I know how much the landowners payments will help our farmers and ranchers. Commodity prices and cattle prices are very volatile which creates a difficult budgeting problem for our New Mexico families that are working in the agriculture industry. The payments to landowners from wind development provides a sustainable financial environment and will therefore, keep more families in agriculture and working the land.

I encourage the Public Regulation Commission to approve this project and allow it to move forward so that Invenergy, LLC. can meet its timeline to be operational by 2020.

Sincerely,

A handwritten signature in cursive script that reads "Pat Woods".

Pat Woods
Senator, District 7

Sandoval, Melanie A., PRC

From: Hall, Cynthia, PRC
Sent: Friday, January 26, 2018 7:57 AM
To: Sandoval, Melanie A., PRC
Subject: FW: Sagamore Wind Energy LLC location control case (17-00275-UT)

Melanie, please file

Cynthia B. Hall, Vice-Chair
NMPRC District 1

From: Terrye Bullers [tbullers@comcast.net]
Sent: Thursday, January 25, 2018 3:03 PM
To: Hall, Cynthia, PRC
Subject: Sagamore Wind Energy LLC location control case (17-00275-UT)

Dear Ms. Hall,

Please do not give approval to Xcel Energy to industrialize the habitat where the Lesser Prairie-Chicken is making its last stand in New Mexico. This iconic species is in deep trouble.

I do not oppose wind energy, but the location of this particular project makes it unacceptable. The proximity of hundreds of turbines will discourage nesting within the Lesser Prairie Chicken area and adjacent lands, including protected areas managed by New Mexico Department of Game and Fish and the Nature Conservancy. The reproductive viability of these magnificent birds will be in jeopardy.

Please do not approve Xcel's request to industrialize the habitat where the Lesser Prairie-Chicken is making its last stand in New Mexico.

Sincerely,
Terrye Bullers

tbullers@comcast.net
1305 Monte Largo NE
Albuquerque, NM 87112

Pena, Sarah, PRC

From: Adrienne Warner [adrienne@unm.edu]
Sent: Thursday, January 25, 2018 11:18 AM
To: Pena, Sarah, PRC
Subject: Sagamore Wind Energy LLC location control case (17-00275-UT)

Dear Ms. Pena and Ms. Hall,

I am writing today to plead with you to deny the application from Sagamore Wind Energy, LLC, for the Roosevelt County wind power project. I have grave concerns about the location of this project, as it will have a devastating effect on the Lesser Prairie-Chicken. You might say, "this project has benefits that outweigh the future of one bird species." There is no doubt that alternative energy solutions are forward-thinking, and yet their location must be forward-thinking as well.

This bird, the Lesser Prairie-Chicken, is a magnificent, weird and wonderful creature. I had the special privilege to visit, in Roosevelt County, their special mating places. These "leks" are where the males dance, flamenco-style, pounding the ground with their feet, showing their headdress, making sounds they'd like to think are irresistible to females. And if a female approves of his dance, she selects him, mates, and then raises the offspring on her own throughout the summer. In April 2013, I was able to watch this dance and selection process, and it was the first time I ever cried at seeing a bird. I know. Weird, right? But they were so magnificent, doing these amazing dances, out in the middle of the desert beyond any human activity. Probably as they have done for hundreds or thousands of years.

I want sustainable energy. I know it's possible and eventual. But please, please, I implore you to deny this project and save the Lesser Prairie-Chicken. They deserve to do their flamenco dances and raise their young, and they have proven to vacate areas where too much infrastructure has interrupted their habitat. They're in big trouble as it is. They need this land.

Thank you for reading, and for your public service.

Sincerely, and imploringly,

Adrienne

Adrienne Warner
Albuquerque, NM

Pena, Sarah, PRC

From: Reuben Weisz [reuben@weisz.org]
Sent: Thursday, January 25, 2018 5:22 PM
To: Pena, Sarah, PRC
Subject: Comments on Sagamore Wind Energy LLC location control case (17-00275-UT)

Hello, I would like to comment on the application from Sagamore Wind Energy LLC to build a 522-megawatt wind power facility in Roosevelt County.

The county is home to the last remaining habitat of the Lesser Prairie-Chicken in New Mexico.

The Lesser Prairie-Chicken is a Federally listed threatened species, and is on the 2016 State of North America's Birds' Watch list which lists bird

species that are most at risk of extinction without significant conservation actions to reverse declines and reduce threats.

The proposed project will add to the threats already facing this threatened species.

New Mexico is a big State. Surely, there must be other locations in the State that could produce wind energy without threatening this species.

Please consider this threat when evaluating this application.

Along with many other residents of New Mexico and tourists, I'm an avid birder. Please also consider the benefits

of conserving the ecosystem in this geographic area for this species. See the report in the attached link for more information on these benefits:

https://headwaterseconomics.org/wp-content/uploads/NMreport_FINAL.pdf

Thanks,

Reuben Weisz

6409 Concordia Road NE

Albuquerque, NM 87111

Pena, Sarah, PRC

From: Susan Russo [tele4fun@gmail.com]
Sent: Thursday, January 25, 2018 6:09 PM
To: Pena, Sarah, PRC
Subject: Sagamore Wind Energy LLC location control case (17-00275-UT)

The proposed Sagamore Wind Energy project would bring an unacceptable threat to the survival of the Lesser Prairie Chicken in it's last remaining habitat of the in our state. This is unacceptable. Please consider and pursue alternatives.

Thank you, Susan Russo
Tijeras, New Mexico

Pena, Sarah, PRC

From: Vicky Lee Groskinsky [vicky.groskinsky@gmail.com]
Sent: Thursday, January 25, 2018 8:02 PM
To: Pena, Sarah, PRC
Subject: Sagamore Wind Energy LLC location control case (17-00275-UT)

Hello, Please do not allow wind turbines in the last habitat in NM of Lesser Prairie-Chicken. Green energy is important but must be done responsibly. Birds die in these large wind farms that are not strategically placed and that is not acceptable. Please save the Lesser Prairie-Chicken's place to exist. Sincerely, Vicky

Vicky Groskinsky
8913 La Barranca
Albuquerque, nm 87111

Pena, Sarah, PRC

From: kushka 53 [kushka53@gmail.com]
Sent: Friday, January 26, 2018 1:15 PM
To: Pena, Sarah, PRC
Subject: Sagamore Wind Energy LLC location control case (17-00275-UT)

Hello,

I have a Masters in Environmental Policy through the Graduate School of Journalism at Columbia University. I have been all over this planet, and moved to beautiful New Mexico 4 years ago. This area in question supports thousands of migratory shorebirds and wildfowl. The project envisions more than 300 turbines and hundreds of miles of associated transmission lines that will create an unacceptable threat to these important habitats in eastern NM. Surely there is another way?

1. Bury the lines. It's time power companies took responsibility for damage to the environment, both literally and aesthetically.
2. There are wind turbines available that cost more but prevent bird deaths due to their unique construction. Insist the company use them only.

Respectfully Submitted,
Karen Petersen
Santa Fe

Pena, Sarah, PRC

From: Toni Carrell [tcarrell@shipsofdiscovery.org]
Sent: Friday, January 26, 2018 1:25 PM
To: Pena, Sarah, PRC
Subject: Sagamore Wind Energy LLC Location Control Case (17-00275-UT)

To Whom It May Concern

I am writing to express my deep concern and strong opposition to the proposed Sagamore Wind Energy LLC wind power facility in Roosevelt County.

The status of the Lesser Prairie-chicken has been under threat by habitat loss and fragmentation from agricultural and oil and gas development for more than 40 years. As a result, today only about 10% of its original range in New Mexico is still occupied.

This is an iconic species and an irreplaceable remnant of our western heritage. I am aware that the Audubon Society has designated a Globally Important Bird Area (IBA) in eastern NM in an attempt to help bring attention to the importance of habitat protections. The project also extends into Audubon's Playa Lakes IBA. These habitats and lakes provide migratory and wintering habitats for thousands of shorebirds and waterfowl in eastern NM.

That is not to say that collaborative efforts have not be initiated to protect the habitats and species. A few years ago wildlife professionals in New Mexico and adjacent states collaborated on an agreement to enlist the cooperation of local stakeholders in voluntary conservation measures for the Prairie-chicken. Despite this effort, the numbers of the Prairie-chicken declined to the point that U.S. Fish and Wildlife listed the species as threatened under the Endangered Species Act. Under this listing it allowed state officials to continue managing habitat in cooperation with stakeholders. Unfortunately, that listing was challenged in federal court and overturned and the Lesser Prairie-chicken so now it continues to struggle to achieve a stable population.

I certainly do not oppose wind energy, but the location of this particular project makes it unacceptable. The proximity of hundreds of turbines will discourage nesting within the project area and adjacent lands, including protected areas managed by New Mexico Department of Game and Fish and the Nature Conservancy. The reproductive viability of these magnificent birds will be in jeopardy.

Although the production tax credit (PTC) for wind-generated electricity is scheduled to be phased out by the end of 2019, in reality the history of this subsidy suggests that such fear is unwarranted. Congress has extended the PTC multiple times. The PRC should not be pressured into approving Xcel's massive project on a time scale to benefit its investors over this state's irreplaceable natural landscapes and wildlife.

I strongly urge the PRC to reject this application and protect the remaining habitat where the Lesser Prairie-chicken is making its last stand in New Mexico.

Thank you for considering my views.

Toni L. Carrell
39 Condesa Road, Santa Fe, NM 87508

Sandoval, Melanie A., PRC

From: Hall, Cynthia, PRC
Sent: Friday, January 26, 2018 2:59 PM
To: Sandoval, Melanie A., PRC
Subject: FW: Sagamore Wind Energy Roosevelt County Proposal

Melanie please file.

Cynthia B. Hall, Vice-Chair
NMPRC District 1

From: SUSAN PEIRCE [speirce@prodigy.net]
Sent: Friday, January 26, 2018 1:37 PM
To: Hall, Cynthia, PRC
Subject: Sagamore Wind Energy Roosevelt County Proposal

Dear Commissioner Hall.

The New Mexico Public Regulation Commission (NMPRC) is evaluating an application from Sagamore Wind Energy LLC to build a 522-megawatt wind power facility in Roosevelt County-- home to much of the last remaining habitat of the Lesser Prairie-chicken in our state and an area dotted with playa lakes that support thousands of migratory shorebirds and wildfowl. The project envisions more than 300 turbines and hundreds of miles of associated transmission lines. This project will create a unacceptable threat to these important habitats in eastern NM.

I do not oppose wind energy, but the location of this particular project makes it unacceptable. The proximity of hundreds of turbines will discourage nesting within the project area and adjacent lands, including protected areas managed by New Mexico Department of Game and Fish and the Nature Conservancy. The reproductive viability of these magnificent birds will be in jeopardy.

Please have a new site selected for the turbines so this will be a win-win for the environment on both counts.

Susan S. Peirce
231B Tano Rd
Santa Fe, NM 87506

Pena, Sarah, PRC

From: John Duncan [jrduncan@me.com]
Sent: Friday, January 26, 2018 4:04 PM
To: Pena, Sarah, PRC
Subject: Sagamore Wind Energy location control case (17-00275-UT)

It has recently come to my attention that the Sagamore Wind Energy company wants to build a 522-megwatt wind power facility in Roosevelt County. If built, this facility would include 300 turbines and many miles of transmission lines.

I am opposed to this development.

In the grand scheme of things I favor green energy, but I am not in favor of destroying vital natural habitat. Roosevelt County is home to the Lesser Prairie Chicken and to many migratory shorebirds and waterfowl. The proposed development will substantially and negatively impact these birds. Clean energy is good. Dead birds are bad. I strongly encourage you to reject the Sagamore proposal and tell them to find another spot. There is no reason to further endanger an already endangered species, or to reduce habitat important to migrating birds.

Please show some leadership on this issue and do the right thing.

Thank you in advance,

John Duncan
12B Camino Barranca
Santa Fe, NM 87507