



February 8, 2008

ARC Chairman David "Lane" Green
Tall Timbers Research Station
13093 Henry Beadel Drive
Tallahassee, Florida 32312
via email to lane@ttrs.org

RE: February 14/15 ARC Agenda Item #12, FPL easement on Hutchinson Island

Dear Chairman Green:

We are writing to express significant concerns with Florida Power and Light's (FPL) proposal to site wind power turbines on state-owned conservation lands in St. Lucie County. The Acquisition and Restoration Council will be requested to consider this proposal at its February 14-15 meeting.

A number of issues are raised with this proposal. They include risks to birds and bats, appropriate and compatible uses of public lands for power generation, and coastal impacts. Further, while we strongly support alternative and clean energy generation as one solution to climate change, we firmly believe this must be done in a way that serves Florida without being at the expense of our natural resources. While this site may have some of Florida's greatest wind generation potential, it is still limited when compared to wind resources elsewhere in the country; accordingly, we seriously doubt that the wind power at this site will make a real contribution to that goal.

Before considering this proposal, the Council must insist on looking at solid and Florida-specific scientific evidence that the proposed facilities will not kill birds. That research is admittedly difficult as Florida does not currently have such facilities (and has never been thought of as a likely place to locate wind power). The applicant has failed to commit to conducting sufficient research to demonstrate that the proposed facilities will not cause unacceptable impacts to birds and bats, and is requesting that you make your decision without the benefit of even the limited quantitative surveys they are currently conducting.

The Council should also carefully consider the question of whether the applicant has demonstrated that public land is necessary for this use. This could become an ugly precedent if other power generation projects are proposed using long-term leases of conservation lands.

Wildlife Impact Hazards

As you well know from Tall Timbers Research Station's excellent studies of the migratory bird collision hazards of communication towers, large structures placed in migratory routes can cause significant avian mortality. Wind power generation facilities, depending on their location, have also been demonstrated to cause significant avian mortality.

Two conservation interests with experience in wind power generation siting, the USFWS and the State of California, have identified risk factors in their siting guidelines that predispose wind power sites to becoming hazards. Several of these factors are present at the proposed conservation land location of this facility:

- (1) proximity to the coast,
- (2) proximity to wetlands,
- (3) location in a migratory corridor (in this case, for both longshore migration of raptors as well as off/onshore migration of neotropical migrants),
- (4) presence of threatened, endangered or declining species near the property (including Wood Stork, Peregrine Falcon, Blackpoll Warblers and more),
- (5) aggregations of wading birds,
- (6) likelihood of low cloud ceilings, and
- (7) location near conservation lands.

Because of these risk factors, Audubon has requested that FPL implement more rigorous wildlife surveys than those they have proposed, to better assess the wildlife risk likely at this specific site. Nevertheless, FPL maintains their survey protocols will be sufficient, even though they will not adequately survey nocturnal avian migrants and bats, the suite of species perhaps most likely to suffer from an inappropriately sited facility. We firmly believe that the Division of State Lands cannot find that the use of this property is compatible with state lands without knowing the results of rigorous pre-construction wildlife surveys.

Appropriateness of Public Conservation Lands for Private Power Generation Siting

ARC needs to be vigilant in guarding the integrity of our state conservation lands. Uses such as power generation on state conservation lands erode the ecological value of these sites and subvert the intent with which they were originally acquired. Additionally, in this case, the impact is not merely the footprint of the easement. In fact, in the event that this does prove to be an inappropriate location after-the-fact, state conservation lands will have been used to create a significant wildlife hazard.

Precedent for Use of State Conservation Lands

By granting this easement, ARC would be setting a difficult precedent for the use of state conservation lands in the siting of wind power infrastructure, and perhaps for all

utility infrastructure. This would be Florida's first commercial grade wind power facility.

Florida's wind power generation potential has been determined to be negligible, except at our coastlines. Florida's highly developed coasts have little unoccupied land remaining. This easement request may be only the beginning of demands placed on Florida's coastal state parks, preserves and refuges, due to the high cost and limited availability of private coastal land for siting wind facilities. This request is not likely to be an isolated incident and the precedent set by ARC in making this determination will be significant and long-lasting.

Coastal Impacts

These turbines are proposed to be sited on a barrier island – part of our dynamic coast--with their footprint partially seaward of the Coastal Construction Control Line, just landward of the island's primary duneline. On the highly erosive coastline of Hutchinson Island, this siting presents a very real possibility that armoring and beach renourishment may be necessary to protect these structures in the immediate future. FPL has not adequately addressed their expectation for public funding of protections for these structures. Even more critical, it is our opinion that a proposed use of conservation lands that could ultimately necessitate coastal armoring is not compatible with the purpose of those conservation lands.

Effectiveness of this Site for Wind Generation

Even though this site is in one of Florida's windiest areas, ultimately, this site will not generate significant amounts of power and will add nothing to base power generation. Its generation capacity will only be meaningful in the low-demand winter months, and the amount of energy it will generate could more easily be recovered through investments in energy efficiency. This project is effectively a demonstration site rather than a significant source to meet Florida's energy demands. While there are obvious benefits to considering the feasibility of wind in Florida, the benefits of the project do not warrant the significant wildlife impacts and bad conservation lands precedent that could result from this easement request.

For these reasons, we request that ARC refuse to consider this request. With this denial, FPL will still have the ability to pursue siting turbines on its own property as they have proposed at the St. Lucie Nuclear Facility to explore the feasibility of wind power generation in Florida. But the likelihood of state conservation lands being used for purposes counter to conservation, and the setting of a dangerous precedent for the siting of utility infrastructure on public lands, would be averted. If at this time, you do not feel that ARC has enough information to deny the proposal, we respectfully request that you direct FPL to conduct more rigorous wildlife surveys, adequately assessing the

nocturnal migrant use of the specific location, and provide ARC with that analysis to better inform the Council's decision at the end of the appropriate two-year study duration.

Thank you for your consideration

Sincerely,

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1000 Friends of Florida

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Cc: Secretary Mike Sole and Mr. Albert Gregory, Department of Environmental Protection
Secretary Tom Pelham and Mr. Grant Gelhardt, Department of Community Affairs
Mr. Ken Haddad and Mr. Gary Cochran, Florida Fish and Wildlife Conservation Commission
Mr. Mike Long, Mr. John Barrow and Mr. John Browne, Department of Agriculture and Consumer Services
Mr. Fred Gaske and Mr. Mike Wisenbaker, Division of Historical Resources, Department of State
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