



April 18, 2016

Tim Coward
Field Manager
Tonopah Field Office
Bureau of Land Management
P.O. Box 911 (1553 South Main Street)
Tonopah, Nevada 89049

Subject: GBBO Baiting Practices at Crescent Dunes Solar Energy Project

Dear Mr. Coward:

SolarReserve's goal is to protect wildlife and move forward with this zero emissions American technology that is able to deliver electricity day and night. As such, we fully support and are implementing our Avian and Bat Protection Plan (ABPP), and all efforts on the part of the BLM, NDOW, USFWS, the GBBO and Stantec to help us identify and mitigate any potential avian issues.

However, we recently realized that, in accordance with the ABPP, the Great Basin Bird Observatory (GBBO) team is planning scavenging rate and detection rate studies. As these studies apparently involve baiting the site with a total of 80 bird carcasses (50 in the buffer zone and 30 in the facility), we have a few concerns.

As you're aware, in the last 12 months, there have been a total of 65 mortalities reported inside the facility as a result of the consolidated monitoring - 80 total mortalities when you include the additional 15 mortalities in the buffer zone. We have a concern that baiting the site and buffer zone with a year's worth of carcasses will attract predators to the site and not only skew the data, but also attract predators and increase predation in the area.

We are also concerned at the public image of killing 80 birds for the sake of the study. This practice has the potential to create additional public concern issues and we all should be prepared to address this issue if raised. Additionally, SolarReserve continues to wrestle with negative press about the potential incident over a year ago on January 14th, 2015 where over 100 birds were reported to have been killed. However, subsequently the Stantec team, based on new knowledge, believe the potential number of actual avian fatalities in that incident was far less and the puffs of smoke were more likely debris from the tower deck. Unfortunately, there have been no statements made publically about this new information.

At this point, I am sure you can understand SolarReserve's hesitation to support a study that involves killing additional birds, and in numbers likely in excess of the small number experienced on site in a year.

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This letter is meant to express our concerns on the baiting practice, but I'll leave you with a few questions/comments:

- Do you believe it is necessary to utilize the “baiting” practice as the only way to determine predation? If so, is a much lower number more acceptable and representative to the study?
- In the event there is public comment on the practice of killing birds for the purpose of a study, does GBBO or the BLM have a ready response we can review to deal with any PR issues that may arise?
- Should the BLM consider releasing a statement correcting the view that the project killed in excess of 100 birds in January 2015? Should SolarReserve release something based on Stantec’s revised view?
- Should the BLM consider releasing a statement on the results of the Stantec report and very low avian fatality results?

We are pleased that monitoring over the last 12 months has proven the Crescent Dunes Solar Energy Facility as one of the safest forms of electricity generation, especially for avian safety, with an average of about five bird fatalities per month reported at the facility - dramatically less than other forms of electricity generation, including natural gas, nuclear, coal and wind energy.

We look forward to cooperating with the BLM on future studies to reinforce this characteristic of solar energy.

With kindest regards,

A handwritten signature in cursive script, appearing to read "Mary Grikas".

Mary Grikas
Vice President Communications

cc: Rob Howe
Kevin Smith
Wendy Seley
Rudy Evenson