

Comments on Wildlife Portion of Case SU-18-02

20 February 2018

Angelo Capparella, Conservation Chair, JWP Audubon Society & Associate Professor of
Vertebrate Zoology, Illinois State University

Summary of Recommendations to the ZBA.

1. Follow the plan as provided by EDP Renewables North America LLC (= EDPR) to address all 6 recommendations of the Illinois Department of Natural Resources, with one caveat regarding recommendation 6.

2. For recommendation 6 regarding Henline Creek, stipulate that EDPR apply the highest standards to avoid instream impacts resulting from construction and related activities on this INAI segment.

Supporting Information

I. Background: In the McLean County code [Chapter 350, Article VI, 350-43 Use standards, OO., (2), (o) Wildlife requirements, (2)], it states: “Required implementation of IDNR/USFWS recommendations based on pre-siting study results, unless credible evidence is presented against the recommendation.”

II. Bright Stalk Wind Farm: This project differs from the previous wind farm project in two ways: (1) the location is such that the impacts on McLean County habitat and wildlife is considerably less, and (2) where they are proposing a modification of the IDNR recommendations they are using credible evidence.

III. IDNR Recommendations and EDPR’s Response: On 5 February 2018, the IDNR issued 6 recommendations. These are designed to reduce the two main likely negative impacts on wildlife by wind turbines and associated infrastructure: 1) mortality, and 2) displacement from suitable habitat areas. In its response, EDPR accepts 2 recommendations in their entirety (1, 4) and has proposed modifications to 4 recommendations (2, 3, 5, 6) based on credible evidence. I will address the latter category of recommendations.

Recommendation #2 [paraphrased]: curtail turbine operations to conserve bats. EDPR is proposing to do a rigorous post-construction study (“Post-construction monitoring study plan for the Bright Stalk Wind Project McLean County, Illinois” February 2018) to determine the number of bat fatalities specific to this wind farm. They have stated that if the fatalities include any threatened and endangered bat species, EDPR will coordinate with the Federal and State agencies

and take appropriate actions to minimize and mitigate for the impact. This may include the pursuit of a federal Incidental Take Permit and/or a state Incidental Take Authorization, both of which require plans to reduce mortality to acceptable levels. If overall non-listed bat species mortality exceeds the number recorded at the existing McLean County Twin Groves Project (12.4 bat fatalities/MW/year), then they will apply appropriate adaptive management measures to reduce overall mortality (e.g., operational curtailment, deterrents); in the case of non-listed bat species, that would be a reduction to 12.4 bat fatalities/MW/year. This value for bats is in the middle of the range for bat mortality in the Midwest.

Recommendation #3 [paraphrased]: conduct three years of mortality monitoring for birds and bats. EDPR is proposing an adaptive management response (“Post-construction monitoring study plan for the Bright Stalk Wind Project McLean County, Illinois” February 2018) consisting of two years of studies to determine the level of mortality specific to this wind farm. The study design they have provided should provide robust information. Potential outcomes of their study include operational changes to reduce mortality (for bats, see recommendation #2) and/or continuation into a third year should the first two years show statistically significant inter-annual variability in bird or bat mortality rates.

Recommendation # 5 [paraphrased]: avoid siting turbines within 500 feet of a perennial stream. I’ve learned in conversations that EDPR is proposing to leave two turbines (T-15 and T-101) within that distance to perform a before and after (year 1 and year 5) scientific study in order to determine the necessity and efficacy of such a setback. The two subject streams, an unnamed tributary of Rooks Creek and a segment of Rooks Creek, would be excellent subjects for this study as neither are under INAI designation and neither has riparian vegetation. The data obtained would be worth any possible impairment to these two sites as such studies related specifically to wind farms are lacking in the scientific literature.

Recommendation #6 [paraphrased]: avoid siting turbines within ½ mile of Henline Creek. EDPR is proposing a modification to reduce the avoidance from ½ mile to a minimum of 500 feet. Because this segment of Henline Creek has an INAI designation due to significant aquatic biodiversity, I urge the ZBA to stipulate that EDPR commit to the highest standards of protection to avoid instream impacts resulting from construction and related activities on this INAI segment. This would include a robust Storm Water Pollution Prevention Plan (SWPPP) with additional measures to ensure that protective provisions are continuously intact (e.g., weekly inspections, inspections after significant rain events).