



# **EDPR Environmental Rebuttal Testimony**

Bright Stalk Wind Farm

February 27, 2018

# IDNR Recommendations

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## Accepted recommendations:

- Recommendation #1 The Department recommends the County consider imposing a requirement for the applicant to avoid siting wind turbines within one mile of Weston Cemetery Prairie Nature Preserve.
- Recommendation #3 The Department recommends the County consider imposing a requirement to conduct three years of mortality monitoring to statistically quantify bird and bat mortality by species due to turbine operations.
- Recommendation #4 The Department recommends the County consider imposing a requirement for the applicant to perform and report fish & mussel surveys 100 meters up and downstream of any proposed physical disturbance of a perennial stream channel or drain associated with Rooks Creek prior to disturbance of the channel.
- Recommendation #5 The Department recommends the County consider imposing a requirement for the applicant to avoid siting turbines within 500 feet of a perennial stream. Alternatively, the applicant could consider sponsoring scientific research to measure and report the effects of turbine noise, vibration, and flicker on aquatic organisms.

# Proposed Modification to Recommendation #2

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**Recommendation #2** The Department recommends the County consider imposing a requirement for the applicant to curtail turbine operations below wind speeds of 5.0 meters per second during the period from July 15 through October 15 to conserve endangered, threatened, and non-listed bats.

- Despite extensive post-construction monitoring at sites in central Illinois, no fatalities of threatened and endangered bat species have been discovered.
- Proposes to address potential risk to threatened and endangered bat species, and non-listed bats, using an adaptive management framework consistent with the US Fish and Wildlife Service Land-Based Wind-Energy Guidelines (USFWS 2012).
- Follow the American Wind Energy Association's voluntary best management practice and feather blades below manufacturer cut-in speeds to reduce bat mortality, which has been shown to reduce bat mortality by approximately 30% at Fowler Ridge, Indiana (Good et al. 2012), during the first fall season of operation
- Lexington Chenoa Wind Farm will monitor the Project's effects on bats using an intensive post-construction monitoring survey during the first three years of operations
- If overall mortality for non-listed bats exceeds the number recorded at the nearby Twin Grove facility (12.4 bats/MW/year), adaptive management measures (e.g., operational curtailment, deterrents) to reduce overall mortality to non-listed species will be applied

# Proposed Modification to Recommendation #6

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**Recommendation #6** The Department recommends the County consider assuring no wind turbines are sited within ½ mile of the Mackinaw River INAI Site (Henline Creek).

- Five turbines (T-76, T-94, T-60, T-61, and T-162) currently sited within ½ mile of Henline Creek
- IDNR bases its Recommendation #6 on impacts to aquatic habitats from noise, vibration, and flicker. Currently, no scientific studies are available to support this recommendation, and are needed to further scientific knowledge used for appropriate wind energy facility siting in Illinois.
- Proposes to meet a minimum setback of 500 feet from Henline Creek to reduce impacts to aquatic species, and conduct scientific pre- and post-construction monitoring of the stream section of Henline Creek closest to the turbines.
- Survey methodologies will be coordinated with the IDNR, and will include at minimum the following:
  - Pre-construction inventory survey of aquatic species along the section of Henline Creek closest to the five wind turbines (approximately 2000-m length of stream).
  - Post-construction inventory of aquatic species at the conclusion of years one and five of operation.
  - EDPR is currently assessing the logistics of also implementing a pre- and post-construction hydro-acoustic study that would measure the baseline noise in the stream before construction begins, and compare to post-construction noise levels.
- Additionally, the applicant will commit to the highest standards of protection to avoid impacts to Henline Creek, and implement a robust Storm Water Pollution Prevention Plan with additional measures to ensure protective provisions are continuously intact (e.g., weekly inspections, inspections after significant rain events).

# Recommendation #6

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# Questions

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