



Illinois Department of Natural Resources

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JB Pritzker, Governor
Colleen Callahan, Director

September 3, 2020

Phillip Dick
McLean County Department of Building and Zoning
115 East Washington Street
Room M102
Bloomington, IL 61702

**RE: Sapphire Sky Wind Farm [Blue Ridge Wind Farm]
Consultation Program
EcoCAT Review #2103417 [2006319]
McLean County**

Dear Mr. Phillip Dick,

The Department has received an EcoCAT submission of this project from the developer (Geronimo Energy) for the purposes of consultation pursuant to the *Illinois Endangered Species Protection Act* [520 ILCS 10/11], the *Illinois Natural Areas Preservation Act* [525 ILCS 30/17], and Title 17 *Illinois Administrative Code* Part 1075. Additionally, the Department may offer advice and recommendations for species covered under the *Fish & Aquatic Life Code* [515 ILCS 5, *et seq.*]; the *Illinois Wildlife Code* [520 ILCS 5, *et seq.*]; and the *Herptiles-Herps Act* [510 ILCS 69].

The proposed action consists of the rezoning of +/- 57,000 acres of primarily agricultural land to accommodate a special use permit for the "Sapphire Sky Wind Farm," formerly known as "Blue Ridge Wind Farm." This proposal includes up to 87 wind turbines, associated access roads, and collection lines. This letter replaces the previous one associated with Blue Ridge Wind Farm under EcoCAT #2006319 issued on March 5th, 2020.

The proposed site for the Sapphire Sky Wind Farm is generally located in southeast McLean County. The township of Bellflower, IL is the closest municipality. The township of Leroy is located +/- 4 miles west of the proposed site and the township of Saybrook is located +/- 3 miles to the north. The project area is confined to the south by the Dewitt/McLean county line. State route 54 runs from approximately the southwest corner of the proposed site to approximately the north east corner of the site.

EcoCAT has indicated records for the following Illinois Natural Areas Inventory sites (INAI) within the project vicinity:

Illinois Natural Inventory Areas
Sangamon River
Salt Creek Farmer City Reach

Bats and Birds

Although there are no records of the state and federally-listed Northern Long-ear Bat (*Myotis septentrionalis*) or the Indiana Bat (*Myotis sodalis*) within McLean County, these species may occur in the project area during the fall migration period. This site is also within a potential migration corridor to hibernacula sites for both species. Additionally, recent records indicate the presence of the listed Upland Sandpiper (*Bartramia longicauda*), Northern Harrier (*Circus cyaneus*) and Short-eared Owl (*Asio flammeus*) within +/- 7 miles from the proposed project site.

Due to the relative proximity of listed bat and bird records coupled with the documented higher risk of impacts to listed and non-listed bats during fall migrating by wind turbine operations in the state, the Department has determined the following recommendations are appropriate to avoid impacts:

- The Department recommends that the County consider requiring the applicant to curtail wind turbine operations below wind speeds of 5.0 meters per second, from sunset to sunrise, between July 15th and October 15th, to minimize the risk of “take” of listed bats and to minimize mortality of all bat species in general. Wind Turbines should also be feathered (not rotating) during these curtailment events.
- If the curtailment regime is not adopted, an increased risk of unlawful take of listed bat species will result. In this case, the Department recommends Incidental Take Authorization (ITA) for Indiana Bat and Northern Long-eared Bat be pursued by the applicant. The County should also consider making an ITA a requirement for the facility if the curtailment regime is not adopted. All matters pertaining to ITA should be directed to the IDNR Office of Resource Conservation, ITA Coordinator.
 - The Department acknowledges here that future data or technologies, as it pertains to wind turbine collision risk for bats, may pose opportunities for new curtailment regimes to be discussed between the wind energy facility and the Department through the operational life of this facility.
- The Department recommends the County consider requiring three years of mortality monitoring to statistically quantify bird and bat mortality, by species, due to turbine operations. If the County chooses not to do so, the applicant should consider implementing such a program to demonstrate the level of mortality experienced and the species affected.
- The Department recommends a proposal on bird and bat mortality monitoring be sent to the Department for review and concurrence on methods and a report on results annually. The project proponent should seek the necessary research permits from the Department’s Office of Resource Conservation to handle birds and bats. If State-listed species are found during this monitoring, Incidental Take Authorization will likely be recommended.
- If significant bird or bat mortality is observed, or listed species are discovered, the Department recommends further coordination be engaged immediately and careful consideration be given to implementing the best available technologies to avoid and minimize these impacts.

*The Department understands a “Tier 1 Site Evaluation” is planned. The Department requests a copy of the final report and opportunity to comment. The findings of the Tier 1 study may result in the Department re-opening this review and modifying its findings and recommendations.

Illinois Natural Areas Inventory Sites

The Department recommends that no wind turbines be sited within one half (0.5) miles of the Sangamon river INAI or Salt Creek-Farmer City Reach INAI.

Stream Setback

To minimize and avoid potential impacts to aquatic life in perennial streams and wildlife in stream riparian zones, the Department recommends a minimum 500-foot setback from any perennial streams with a non-forested riparian zone. This measure will also help avoid impacts to the state-threatened Slippershell mussel (*Alasmidonta viridis*) and Mudpuppy (*Necturus maculosus*) known to occur in the Sangamon River watershed.

- This recommendation would apply to Lone Tree Creek and Blue Ridge Special Creek.

Forest Setback

The Department recommends a minimum 1,000 foot setback from all forested areas to avoid and minimize impacts to all bird and bat species. This includes forested stream corridors. These forested areas have a higher likelihood of harboring significant wildlife biodiversity, including birds and bats.

- This would include sections of the Salt Creek located in Township 22N Range 6E Section 30, Section 31 and Township 22N Range 5E Section 36 of McLean county.

Bald and Golden Eagles

These species are protected under the Federal *Bald and Golden Eagle Protection Act* [16 U.S.C 668-668c]. The Department recommends coordination with the U.S Fish and Wildlife Service regarding the potential adverse impacts of this wind farm on these species.

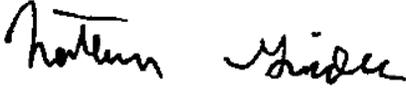
Given the above recommendations are adopted, the Department has determined that impacts are unlikely. In accordance with 17 Ill. Adm. Code 1075.40(h), please notify the Department of your decision regarding these recommendations.

Consultation on the part of the Department is closed unless additional information or advice related to this proposal is required. Consultation for Part 1075 is valid for two years unless new information becomes available which was not previously considered; the proposed action is modified; or additional species, essential habitat, or Natural Areas are identified in the vicinity. If the action has not been implemented within two years of the date of this letter, or any of the above listed conditions develop, a new consultation is necessary.

The natural resource review reflects the information existing in the Illinois Natural Heritage Database at the time of the project submittal and should not be regarded as a final statement on the project being considered, nor should it be a substitute for detailed site surveys or field surveys required for environmental assessments. If additional protected resources are unexpectedly encountered during the project's implementation, the applicant must comply with the applicable statutes and regulations.

Please contact Kyle Burkwald of this office at 217-785-4984 or Kyle.Burkwald@illinois.gov for additional information on this review, or if providing a response to this correspondence.

Thank you,

A handwritten signature in black ink that reads "Nathan Grider". The signature is written in a cursive style with a large initial 'N' and 'G'.

Nathan Grider
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CC:
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