



Stantec Consulting Services Inc.
2300 Swan Lake Boulevard, Suite 102
Independence IA 50644
Tel: (319) 334-3755
Fax: (319) 334-3780

November 7, 2014

Mr. Charles Schopp
Livingston County Zoning Administrator
112 West Madison Street
Pontiac, IL 61764

**Reference: *Response to Illinois Department of Natural Resources Comments
Pleasant Ridge Wind Project
Livingston County, Illinois***

Dear Mr. Schopp:

The purpose of this letter is to provide a response to comments and recommendations included in the Illinois Department of Natural Resources' (IDNR) letter dated September 8, 2014 regarding the proposed construction of the Pleasant Ridge Wind Project in Livingston County. Specific recommendations provided in the letter are listed below along with a response.

Recommendation #1: *The County should consider a requirement for the applicant to conduct new mist-netting and acoustic monitoring studies to identify the bat species and bat activity areas within, and in the vicinity of, the proposed Pleasant Ridge facility. Particular attention should be paid to wooded areas along Indian Creek, the South Fork of the Vermilion River, and the North Fork of the Vermilion River.*

Pleasant Ridge does not believe this recommendation is necessary. In 2014, Pleasant Ridge reviewed the results of previously completed surveys and determined that the previous surveys conducted for the project remain valid given that habitat within the project area has not appreciably changed. The U.S. Fish and Wildlife Service (USFWS) concurred with this determination. Pleasant Ridge has assumed possible presence of listed bats in the vicinity of the project and has designed and sited project facilities, and will implement operational measures, to avoid and minimize impacts to bats. Given that these measures have been accepted by the USFWS as successfully avoiding and minimizing impacts to bats, no additional surveys are warranted.

Recommendation #2: *The County should consider a requirement for the applicant to conduct at least one bat activity season (April-October) of post-construction bat mortality monitoring to establish a baseline for the scale of bat mortality due to normal wind farm operations, and to identify the species sustaining mortality.*

Pleasant Ridge does not believe this recommendation is necessary. Although not specifically stated, this recommendation implies uncurtailed operation of the facility during the first year of operation. Pleasant Ridge intends to operate at a 6.9 m/s cut-in speed during fall migration in order to reduce overall bat mortality and avoid take of listed bat species. Pleasant Ridge believes that operating uncurtailed is unnecessary and the risk to listed species and all bats would outweigh any possible benefit of having a site-specific fatality rate.



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Recommendation #3: *The County should consider a requirement that wind turbine generators be set back at least 1,000 feet from wooded or forested areas which likely provide foraging habitat for bats or provide “commuting” corridors bats may follow between foraging areas.*

Pleasant Ridge agrees with this recommendation and during design of the project incorporated a 1,000 foot setback from woodlands containing suitable bat habitat.

Recommendation #4: *The County should consider a requirement for the applicant to prevent “freewheeling” of turbine rotors at wind speeds below the manufacturer’s recommended “cut-in” wind speed between April 1 and October 31 each year.*

Pleasant Ridge agrees with this recommendation and has incorporated feathering of turbine blades below the cut in speed into project operation.

Recommendation #5: *The County should consider a requirement for the applicant to implement mortality reduction measures during August, September, and October, the peak months for bat mortality. The Department recommends turbine cut-in speeds be raised (curtailed) to not less than 5.5 meters per second (12.3 mph) between sunset and sunrise whenever ambient air temperatures at nacelle height remain above 15°C (60°F) for a rolling average period of ten minutes.*

Pleasant Ridge agrees that mortality reduction measures should be incorporated into the project. USFWS has issued a Technical Assistance Letter (TAL) that acknowledges that Pleasant Ridge will implement measures to avoid impacts to listed species. Per the TAL, Pleasant Ridge will raise cut-in speeds to the more protective 6.9 m/s from Aug 1 – Oct 7.

Recommendation #6. *The County should consider a requirement for the applicant to conduct an additional activity season of mortality monitoring following the implementation of minimization and avoidance measures to evaluate their effectiveness.*

See response to Recommendation #2. The Year-1 carcass monitoring study will include monitoring of turbines where both feathering and raised cut-in speeds are being implemented to avoid and minimize impacts to bats. In consultation with USFWS, Pleasant Ridge has committed to 3-years of fall carcass monitoring and less intensive monitoring every 3 years during the life of the project.

Recommendation #7. *Based on the inferred presence of bachelor and maternity colonies derived from 2011 mist-netting for this project, the Department recommends the County should consider a requirement that the applicant make a good-faith effort to obtain an Incidental Take Authorization (ITA) from the IDNR for the Northern Long-Eared Bat, pursuant to Title 17 Part 1080 of the Department’s Administrative Rules.*

Pleasant Ridge does not believe this recommendation is necessary. Pleasant Ridge will implement operational measures to avoid take of listed bats. As noted in response to Recommendation #5, USFWS has issued a TAL that acknowledges that Pleasant Ridge will implement measures to avoid take of listed species. USFWS has confirmed that an Incidental Take Permit issued under Section 10 of the Endangered Species Act will therefore not be necessary. For the same reasons, a state Incidental Take Authorization is also not necessary.



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Recommendation #8: *The Department recommends the County consider a requirement for the applicant to perform at least one full season of post-construction avian mortality monitoring of sufficient intensity to characterize the losses to be expected from this installation. A report of the results should be provided to both the County and the Department of Natural Resources.*

As a result of consultation with the USFWS, Pleasant Ridge will conduct spring and fall bird and bat carcass monitoring for a period of 3 years, and fall monitoring every 3 years thereafter for the life of the project. This is substantially more than the recommendation suggests. Reports will be provided to the USFWS.

Recommendation #9: *The County should consider requiring the prompt repair or replacement of disrupted agricultural field tiles to minimize disturbances to the flow and thermal regimes of receiving streams.*

Pleasant Ridge agrees with this recommendation, and this issue is addressed by the proposed Agricultural Impact Mitigation Agreement (AIMA) that has been submitted to the County.

Recommendation #10: *The County should consider requiring grading of disturbed areas to reflect as nearly as possible the original surface contours, to minimize alterations of watershed catchments.*

See Response to Recommendation #9.

Recommendation 11: *The County should consider requiring the effective implementation and maintenance of erosion control measures to minimize pollution, siltation, and sedimentation in receiving streams to protect aquatic habitats.*

See Response to Recommendation #9. Erosion control measures will also be addressed by the stormwater pollution prevention plan (SWPPP).

Recommendation #12: *The County should consider requiring the applicant to perform acoustic/kinetic studies to determine the range, strength, and frequencies of aquatic noise generated by wind turbine operations.*

Pleasant Ridge does not believe this recommendation is necessary. Pleasant Ridge is not aware of any commercially available scientific data that suggest that turbine noise and vibration will impact freshwater aquatic species. Therefore, acoustic/kinetic effects of an operating wind farm on these species cannot be reasonably anticipated to occur. A scientifically valid before/after/control/impact study cannot likely be designed in the project setting, so the time and expense associated with the proposed monitoring is not likely to increase the scientific knowledge regarding possible impacts to aquatic species.

Recommendation #13: *The County should consider requiring the applicant to perform biological surveys of each stream and channel within the project area and its near vicinity to characterize the invertebrate, mussel, fish, and amphibian communities which are present, with follow-up studies at intervals to monitor changes which may be attributable to wind turbine operation. Surveys in the winter and early summer may capture important seasonal movements.*

Pleasant Ridge does not believe this recommendation is necessary. Pleasant Ridge is not aware of any commercially available scientific data that suggest wind turbine operation has an effect on invertebrate,



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mussel, fish, or amphibian community composition. If follow up studies were to show a change in community composition in one or more of the taxa, it would not be possible to show a causal link to wind turbine operation or conclude that observed changes are attributable to wind turbine operation given the many other factors that could affect community composition, including poor water quality resulting from erosion of sediment and pesticide runoff from agricultural fields, disease, invasive species, and climate change.

Recommendation #14: *The Department recommends the County consider a requirement the applicant establish an instrumented monitoring station at the lower end of the Felky Slough - Saunemin Reach INAI Site to identify and monitor the frequency, duration, and amplitude of acoustic and kinetic vibrations in the INAI Site which may be emanating from project wind turbines. The Department recommends a second such station in the North Fork of the Vermilion River at the point nearest a project wind turbine for comparison.*

Pleasant Ridge does not believe this recommendation is necessary. The Felky Slough - Saunemin Reach INAI Site is located approximately 4.5 miles from the nearest proposed turbine. Information provided in the IDNR letter indicates that the stream supports mussels, but there are no records of threatened or endangered species. Pleasant Ridge is not aware of any commercially available scientific data that suggest that turbine noise and vibration will impact freshwater mussel or fish species at a distance of greater than 4 miles. Therefore, acoustic/kinetic effects of an operating wind farm on these species cannot be reasonably anticipated to occur.

Recommendation #15: *The Department recommends the County consider a requirement the applicant establish an instrumented monitoring station at the lower end of the Charlotte Reach INAI Site to identify and monitor the frequency, duration, and amplitude of acoustic and kinetic vibrations in the INAI Site which may be emanating from project wind turbines.*

Pleasant Ridge does not believe this recommendation is necessary. The Kelly Creek - Charlotte Reach INAI Site is more than 3 miles from the nearest proposed turbine. Information provided in the IDNR letter indicates that the stream supports mussels, but there are no records of threatened or endangered species. Pleasant Ridge is not aware of any commercially available scientific data that suggest that turbine noise and vibration will impact freshwater mussel species at a distance of greater than 3 miles. Therefore, acoustic/kinetic effects of an operating wind farm on these species cannot be reasonably anticipated to occur.

If you have any questions, or need additional information, please feel free to contact me at 319-334-3755.

Regards,

STANTEC CONSULTING SERVICES INC.

A handwritten signature in blue ink that reads "Terry VanDeWalle".

Terry VanDeWalle
Senior Biologist
terry.vandewalle@stantec.com