



McLean Wind Energy Center LLC
One South Wacker Drive, Suite 1800
Chicago, Illinois 60606
PH: (312) 224-1400

January 4, 2018

Philip Dick
McLean County Department of Building and Zoning
McLean County Government Center
115 East Washington Street, Room M-102
P.O. Box 2400
Bloomington, IL 61701-2400

SENT VIA EMAIL to Philip.Dick@mcleancountyil.gov

**RE: McLean Wind Energy Center
Endangered Species Consultation Response
EcoCAT Review #1804681**

Dear Mr. Dick:

We appreciate McLean County's consideration of the recommendations received from the Illinois Department of Natural Resources (IDNR) on January 2, 2018, as part of the consultation process 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.

McLean County Wind Energy Center LLC (MWEC) voluntarily followed the US Fish and Wildlife Service (USFWS) *Land-based Wind Energy Guidelines* (WEG 2012) and the USFWS *Eagle Conservation Plan Guidance* (ECPG 2013), which set forth a tiered approach for evaluating the wildlife and habitat within a project area. The tiered approach is an iterative decision-making process for collecting information in increasing detail, quantifying the possible risks of proposed wind energy projects to species of concern and their habitats, and evaluating those risks to make siting, construction, and operation decisions. Furthermore, consistent with the WEG, MWEC consulted with both the IDNR and USFWS. MWEC met with USFWS in March 2016, February 2017, and October 2017 to discuss which wildlife surveys would be conducted, survey methodologies, and the survey results. USFWS did not provide MWEC with recommendations, as it was satisfied with the scope and approach adopted by MWEC. As part of the consultation process with IDNR, MWEC received the following recommendations, to which it offers its responses below.

Recommendation #1: 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.

MWEC is willing to curtail turbine operations below wind speeds of 5.0 meters per second during the period from July 15 through October 15, unless an alternate conservation strategy is later negotiated with and approved by the USFWS, if the County makes this recommendation.

Recommendation #2: 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.

MWEC will conduct the industry standard of one year of post-construction monitoring. Given its experience, MWEC expects that the results of subsequent years of monitoring would be very similar to the first year. Nonetheless, MWEC will also develop a Bird and Bat Conservation Strategy (BBCS) that will identify an adaptive management plan. The adaptive management plan will outline the steps to be taken if fatality rates are higher than expected following the one year of post-construction monitoring.

Recommendation #3: 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 prior to disturbance of the channel.

MWEC does not believe that additional requirements are necessary beyond those imposed by the conditions of any permitting required by the Army Corps of Engineers. MWEC will also comply with the erosion control measures provided in its stormwater pollution prevention plan (SWPPP). Most of the perennial streams in the project area have riverbeds and flow paths that have been modified to steep ditches flowing in straight lines for the purpose of maximizing agricultural production and are unlikely to support fish and mussels.

Recommendation #4: The Department recommends the County consider imposing a requirement for the applicant to perform and report trapping surveys for the Mudpuppy Salamander in perennial portions of tributaries of the Vermilion and Mackinaw Rivers within the facility.

MWEC does not believe this recommendation is necessary. MWEC is not aware of any publicly available scientific data that suggest that wind turbines will impact aquatic species.

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.

MWEC does not believe this recommendation is necessary. MWEC is not aware of any publicly available scientific data that suggest that wind turbines will impact aquatic species. Further, as noted above, many of the perennial streams in the project area have riverbeds and flow paths that have been modified to steep ditches flowing in straight lines for the purpose of maximizing agricultural production and are unlikely to support sensitive aquatic species.

Invenergy

McLean Wind Energy Center LLC
One South Wacker Drive, Suite 1800
Chicago, Illinois 60606
PH: (312) 224-1400

Recommendation #6: The Department recommends the County consider assuring no wind turbines are sited within one-half mile of the Mackinaw River Land & Water Reserve, or the Mackinaw River main channel, which comprise the Mackinaw River INAI Site.

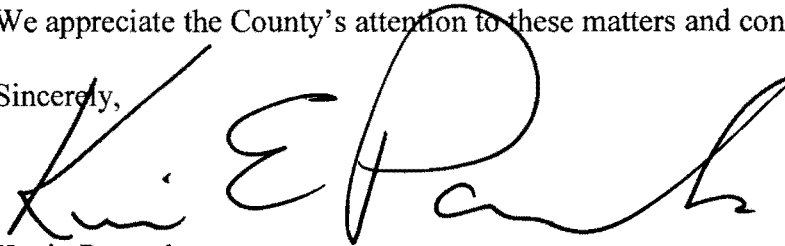
MWEC has sited 115 of 117 turbines more than one-half mile from the Mackinaw River. MWEC is willing to site all turbines more than one-half mile from the Mackinaw River if the County makes this recommendation.

Recommendation #7: The Department recommends the County consider imposing a requirement for the applicant to perform trapping surveys for the Franklin's Ground Squirrel in suitable habitat within the boundaries of the facility.

MWEC does not believe this recommendation is necessary. This species has not been documented in the project area. MWEC is also not aware of any publicly available scientific data that suggest that shadow flicker will impact this species.

We appreciate the County's attention to these matters and consideration of MWEC's responses.

Sincerely,



Kevin Parzyck
Vice President
McLean Wind Energy Center
One South Wacker Drive
Suite 1800
Chicago, IL 60606