

APPENDIX E: PUBLIC COMMENTS and RESPONSES

Heartland Community College Draft Environmental Assessment Comments and Responses

Number	Commenter	Comments Received	Comment Summary	Response
1	Jonathan L Casebeer Chief Environmental Branch Department of Military Affairs	10/4/2010	Document was thorough and concise. Requested copy of appendices (subsequently provided via e-mail)	Thank you for your comment. Your comments are appreciated.
2a	Angelo Capparella JWP Audubon Society	10/6/2010	The use of a tubular tower, minimum FAA lighting, etc. are in fact standard practices for all turbines for reasons not necessarily linked to the reduction of wildlife fatalities. The only likely effective mitigation for bats is to curtail turbines by increasing the cut-in speed during periods of known heavy bat migration in our area (primarily during weather conditions favorable for migration during the period late August to October). [See Arnett et al. 2010, Effectiveness of Changing Wind Turbine Cut-in Speed to Reduce Bat Fatalities at Wind Facilities—Final Report (available at http://www.batsandwind.org)]. We would like to see this actual mitigation option recommended in the EA.	Both the use of monopole (tubular) supports and FAA minimum lighting requirements are referenced in the Interim Guidance on Avoiding and Minimizing Impacts to Wildlife from Wind Turbines as part of their Turbine Design and Operation recommendations (USFWS 2003). Heartland Community College will consider an increase in the turbine's cut-in speed after further evaluation of the specific turbine model chosen for the site.
2b	Angelo Capparella JWP Audubon Society	10/6/2010	We would like to see one year of monitoring for bat and bird mortality. The implementation of monitoring would serve three purposes: 1) determine to what extent there is mortality that may require mitigation, 2) provide a data source on wildlife mortality regarding a single turbine in an urban setting, and 3) be more consistent with the green image that HCC has been cultivating. Item 2 is especially interesting as my understanding is that there is little to no data on the effects of large urban turbines.	DOE and HCC recognize the benefit of post-construction avian and bat mortality monitoring for wind turbine projects. While neither USFWS, nor IDNR has required such monitoring, HCC has agreed to perform voluntary monitoring during the initial post-construction fall migration season (approximately 8-12 weeks, based predominantly on Indiana bat migration habits). The DOE is working with USFWS Region 3 to establish an appropriate protocol for post-construction monitoring for DOE funded single and small scale wind turbines in the Midwest. The final protocol is expected to include details related to timing, frequency, and reporting. HCC would implement monitoring consistent with the final protocol.
2c	Angelo Capparella JWP Audubon Society	10/6/2010	You are incorrect that there are no existing bird survey data for the project area. Dr. Angelo Capparella, ornithologist in the School of Biological Sciences at Illinois State University (ISU), did three summers (2006-2008) of single day breeding bird counts and the results were given to the President's office of HCC. We also have data from a graduate student at ISU on the waterfowl usage of the HCC pond in the project area as part of his on-going thesis.	The breeding bird counts (obtained during the summers of 2006-2008) and waterfowl counts as provided to John Jediny, DOE, via email on October 20, 2010 were reviewed. The breeding bird and waterfowl counts will be referenced in the Final EA.
2d	Angelo Capparella JWP Audubon Society	10/6/2010	You are incorrect that there are no bird viewing sites within the immediate vicinity of the project location. HCC has bird viewing sites on their campus: the pond, the 5-acre restored prairie, adjacent to the HCC habitat block (separated by a road), and associated greenspace.	Thank you for your comment. The information provided will be referenced in the Final EA. The pond, 5-acre restored prairie and associated green space will be referenced in the Final EA as locations from which birds can be viewed. Appendix A - Figure 5 will be revised to indicate the location of the 5-acre restored prairie.
2e	Angelo Capparella JWP Audubon Society	10/6/2010	You cite the Birding McLean County website as 2010 despite it stating that the last update was 14 August 2007. This was also before our local experts knew fully the significance of the pond for migrating waterfowl.	The reference to 2010 associated with the Birding McLean County website was intended to indicate that the website was accessed in 2010. The citation has been revised to reflect that the website was last updated on 14 August 2007. Additional reference was made to IDNR's online references to the best birding areas in the Illinois.
2f	Angelo Capparella JWP Audubon Society	10/6/2010	Data from the literature and from local wind farm surveys shows that three species of tree bats (Hoary, Red, and Silver-haired) migrate in large numbers over agricultural fields and towns in the Midwest, including McLean County. So it is very likely that HCC is in the migratory pathway of thousands of bats of these three species.	The EA references the possibility that suitable habitat for these three bat species may exist in the vicinity of the project area and that these species may have geographic distributions which may include the project area. The un-cited data referenced in item 6 of the comment letter (indicating that the Hoary, Eastern Red and Silver-haired bats migrate in large numbers over agricultural fields and towns including McLean County) will be incorporated into the Final EA.
2g	Angelo Capparella JWP Audubon Society	10/6/2010	Incorrect address was used in Appendix D (EA Stakeholder List) for our organization.	Thank you for your comment. The address has been corrected in final stakeholder list. The address referenced in Appendix D (EA Stakeholder List) for the organization will be updated as follows: John Wesley Powell Audubon Society, P.O. Box 142, Normal, IL 61761.
3	Lisa Bonnett Acting Deputy Director Illinois Environmental Protection Agency	10/21/2010 (After Close of Comment Period)	The Agency has no objections to the project. Acquisition of a NPDES permit is needed if more than one acre is disturbed during construction. Solid waste must be properly disposed of or recycled.	Thank you for your comment. The intent to obtain an NPDES permit is referenced multiple times throughout the EA. Waste management is also addressed in the EA and will be done in accordance with all in applicable Federal, State, and local regulations.



ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

1021 North Grand Avenue East, P.O. Box 19276, Springfield, Illinois 62794-9276 • (217) 782-2829
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PAT QUINN, GOVERNOR

DOUGLAS P. SCOTT, DIRECTOR

217-782-0547

October 21, 2010

Mr. John Jediny (EE-3C)
Department of Energy Headquarters
1000 Independence Ave. SW
Washington, DC 20585

Dear Mr. Jediny:

We have reviewed the information received on the proposed project for the Heartland Community College (HCC) Wind Energy Project in McLean County (Normal, Illinois).

The Agency has no objections to the project; however a construction site activity stormwater NPDES permit may be required from the Division of Water Pollution Control if one or more than one acre is disturbed during construction. For information concerning the NPDES permit, you may contact Al Keller, 217-782-0610.

Solid and hazardous waste must be properly disposed of or recycled.

Sincerely,

Lisa Bonnett
Acting Deputy Director



John Wesley Powell Audubon Society

P.O. BOX 142 • NORMAL, ILLINOIS 61761

October 6, 2010

DOE Headquarters
c/o John Jediny (EE-3C)
1000 Independence Ave., SW
Washington, D.C. 20585

RE: draft EA for HCC Wind Energy Project

Dear Mr. Jediny:

I am writing as Conservation Chair for the John Wesley Powell Audubon Chapter in McLean County to provide comments on the draft Environmental Assessment (EA) for the 1.5 megawatt wind turbine on the Heartland Community College (HCC) campus in Normal, McLean County, Illinois. We are an official chapter of the National Audubon Society and an affiliate chapter of the Illinois Audubon Society. We are concerned about our local wildlife and ecosystems.

Our concern about the EA is that the wildlife/biological resources sections (2.5.1 and 3.2.2.6) were done without any input of local knowledge, thereby leading to a perfunctory analysis with mistakes and incomplete components. This weakens the reliability and accuracy of the analysis, thereby calling into question the robustness of the bat and bird conclusions in terms of impacts and adequate mitigation.

1. Reference is made (page 12) to the use of a tubular tower, minimum FAA lighting, etc as being mitigation components. Our understanding is that these are in fact standard practices for all turbines for reasons not necessarily linked to the reduction of wildlife fatalities. The only likely effective mitigation for bats is to curtail turbines by increasing the cut-in speed during periods of known heavy bat migration in our area (primarily during weather conditions favorable for migration during the period late August to October); see Arnett et al. 2010, Effectiveness of Changing Wind Turbine Cut-in Speed to Reduce Bat Fatalities at Wind Facilities—Final Report (available at <http://www.batsandwind.org>). We would like to see this actual mitigation option recommended in the EA.

2. No mention is made (page 12) about the prospects for monitoring the tower to assess, with real information instead of speculation, whether there is a mortality issue or not. We would like to see one year of monitoring for bat and bird mortality. This is an educational institution and the implementation of monitoring would serve three purposes: 1) determine to what extent there is mortality that may require mitigation, 2) provide a data source on wildlife mortality regarding a single turbine in an urban setting, and 3) be more consistent with the green image that HCC has

been cultivating. Item 2 is especially interesting as my understanding is that there is little to no data on the effects of large urban turbines.

3. You are incorrect (page 32) that there are no existing bird survey data for the project area. Dr. Angelo Capparella, ornithologist in the School of Biological Sciences at Illinois State University (ISU), did three summers (2006-2008) of single day breeding bird counts and the results were given to the President's office of HCC. Dr. Capparella is also Curator of Birds and Mammals (with US FWS and IDNR permits), and is a US FWS volunteer doing an official dove count route (#570) and an official BBS route (#34-029) outside of the turbine site area. We also have data from a graduate student at ISU on the waterfowl usage of the HCC pond in the project area as part of his on-going thesis. In our experience, it is a regrettable regular occurrence that federal and state agencies do not consult with local experts in universities and conservation groups.

4. You are incorrect (page 32) that there are no bird viewing sites within the immediate vicinity of the project location. HCC has bird viewing sites on their campus: the pond, the 5-acre restored prairie, and associated greenspace. The pond has been the subject of IDNR assistance over the years to improve its habitat features using taxpayer dollars. The 5-acre prairie was restored through the hard work of HCC and ISU students and faculty. This complex of habitat has been used regularly for public bird walks; for example, during the Autumnal Festival held by the ISU Horticulture Department. Finally, there is additional restored prairie at this ISU Horticulture facility which is adjacent to the HCC habitat block (separated by a road). Did any wildlife expert associated with this EA actually visit the project area?

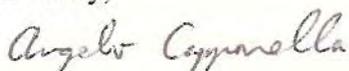
5. You cite (page 32) the Birding McLean County website as 2010 despite it stating that the last update was 14 August 2007. This was also before our local experts knew fully the significance of the pond for migrating waterfowl.

6. You are incorrect (page 33) that the lack of roosting habitat for bats means that there will be no significant number of bats present. Data from the literature and from local wind farm surveys shows that three species of tree bats (Hoary, Red, and Silver-haired) migrate in large numbers over agricultural fields and towns in the Midwest, including McLean County. So it is very likely that HCC is in the migratory pathway of thousands of bats of these three species.

7. Please note that the incorrect address was used in Appendix D (EA Stakeholder List) for our organization. The correct address is: John Wesley Powell Audubon Society, P.O. Box 142, Normal, IL 61761.

We thank the DOE for the opportunity to submit these comments and look forward to your responses.

Sincerely,



Angelo Capparella
Conservation Chairperson
John Wesley Powell Audubon Society

From: [Casebeer, Jonathan Mr Facilities](#)
To: [Jediny, John;](#)
cc: [Hubbard, Jim; Ferro, James;](#)
Subject: RE: Heartland Community College- Wind Energy Project (UNCLASSIFIED)
Date: Monday, October 04, 2010 12:43:51 PM

Classification: UNCLASSIFIED
Caveats: NONE

John

I have reviewed the document, it was thorough and concise except this document seems to be missing the supporting documentation Appendix A-D. Please send me these if you can, especially appendix A & B. Since the land would be leased to us it would not be subject to the noise rules going from class A to Class B lands.

Section 901.103 Sound Emitted to Class B Land

Thank you

Jonathan L Casebeer
Mr. Jonathan L Casebeer
Chief Environmental Branch
Department of Military Affairs
1301 North MacArthur Blvd.
Springfield IL, 62702
Com (217) 761-3794
DSN 555-3794
Fax (217) 761-3790

-----Original Message-----

From: Jediny, John [<mailto:John.Jediny@ee.doe.gov>]
Sent: Friday, October 01, 2010 3:39 PM
To: Casebeer, Jonathan Mr Facilities
Cc: 'Hubbard, Jim'; Ferro, James
Subject: Heartland Community College- Wind Energy Project

Hi John,

I wanted to personally invite you to review the Draft Environmental Assessment prepared for Heartland CC's proposed wind turbine. If you would like (though not necessary) you can provide any comments you may have directly to me. If you would like further clarification or if you have any questions please feel free to contact me directly, my information is below.

Thank you and have a great weekend,

John Jediny
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Classification: UNCLASSIFIED
Caveats: NONE