

Office of the Mayor

Laurel Lunt Prussing

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February 8, 2011

Morgan B. Johnston Sustainability and Transportation Coordinator University of Illinois at Urbana-Champaign Facilities & Services, 115J PPSB, MC-800 1501 S. Oak Street Champaign, IL 61820

RE: South Farms Wind Turbine Proposal

Dear Morgan:

I would like to take this opportunity to thank you and other University staff for working with the City of Urbana to conduct a public input process regarding the proposed Wind Turbine project at the South Farms. The City is committed to the principles of citizen engagement, sound land use planning, and environmental sustainability and we view this project as an important opportunity to collaborate with the University in promoting these principles.

On behalf of the City of Urbana, I would like to offer the following comments and requests regarding the project at the South Farms parcel, located generally south of Curtis Road and west of Philo Road.

- 1. Alternative Acceptable to City of Urbana At the public meeting on January 31, 2011, University Staff presented an alternative to the currently proposed location for a single wind turbine (see attached map). Because this alternative location would meet the community standards for wind turbine setbacks from residential properties that have been adopted by the City of Urbana (by Ordinance No. 2010-09-075, which have been based in part upon Illinois model ordinances and the Champaign County regulations), we respectfully request that this alternative location be pursued instead of the proposed location. This alternative location is further from nearby residences and would reduce impacts upon them due to noise, shadow flicker, etc.
- 2. City Requests Amendment to University Master Plan Due to anticipated impacts upon neighboring residential properties and conflicts with areas that are planned in the future for residential use according to the Urbana Comprehensive Plan, we hereby request that the University of Illinois amend its Master Plan to remove the three wind turbine locations shown on the South Farms parcel, and instead to show only the alternative location that is noted above. Neither the City of Urbana, Champaign County, Urbana Township, nor the neighboring residents were notified or coordinated with in a

meaningful manner when this amendment to the Master Plan was made. As discussed previously, the wind turbine locations shown on the Master Plan are in conflict with both the City of Urbana Zoning Ordinance and with its Comprehensive Plan.

- 3. Need for a Professional Noise Analysis A number of residents have questioned the noise impact analysis presented by the University of Illinois. At the presentation on January 31, 2011, the University representative stated that the noise levels due to the wind turbines would be approximately 45 decibels at the edge of the University property. We respectfully request that the University commission a qualified noise specialist to respond to the concerns of neighbors regarding the study and to complete an update of the study to identify the noise impacts upon nearby residents and to demonstrate that Illinois Pollution Control Board standards will be met. The noise expert can also validate whether and to what extent noise may be mitigated by distance, tree cover, and topographic differences. In prior instances of noise concerns, the City of Urbana has retained a local noise specialist to assist in responding to neighbor concerns about two commercial operations within the city and have been pleased with the assistance that has been provided.
- 4. Need to Get Approval from Urbana Township Road Commissioner Jim Prather At the presentation on January 31, 2011, you stated that road damage would be unlikely to occur due to the single proposed wind turbine transport and that if any damages were to occur they would be repaired after the fact with construction contingency funds from the overall project. We request that a qualified road engineer be retained to study the potential routing; evaluate the existing road strength, alignments, curvatures, and locations and quality of all culverts and tiles; and to make recommendations regarding road improvements that may be necessary prior to damages occurring. Urbana township roads have been built and maintained by taxpayers for the purposes of current vehicle loads and traffic levels and there is no reason to believe they could sustain a 80,000+ pound load and 150-foot ± turning radii without suffering damages. If roads, culverts, and tiles are damaged due to an unplanned transport of the wind turbine, further damages may be sustained by the public as transport and farm operations are interrupted while repairs are made. We respectfully request that you consult with Jim Prather, the Urbana Township Road Commissioner, and work with him to prepare a routing plan and to enter into a road agreement prior to the start of the project. We further request that adequate funds be set aside to execute the road agreement without the need to resort to contingency funds, which may be necessary to address unanticipated concerns.
- 5. **Professional Shadow Study Needed** We request that an updated shadow study be prepared by a qualified professional to quantify the impacts that may be sustained by nearby residents and to recommend any necessary mitigation measures.

6. City Requests Verification of University Compliance with State and Federal Regulations University staff have stated that they will not seek to comply with the City's zoning ordinance with respect to wind turbines, but will comply with other relevant state and federal regulations. While we believe compliance with the Urbana ordinance is legally required (because the authority is expressly granted in the special statute regarding placement of wind turbines), we are at minimum requesting verification of compliance with other state and federal regulations so that we can be assured of no liability in these matters. Relevant regulations include those pertaining to Endangered Species, Clean Water, FAA, historic resources, etc. This request is being made as the City has been put on notice by certain state agencies that if the University does not comply with the pertinent regulations, the City may be held accountable due to the statutory provision regarding wind turbines noted above. We appreciate your cooperation in this matter.

As a general note, we are encouraged that the University is considering a revised location of the wind turbine that will help to minimize conflicts with local plans and regulations and reduce impacts upon nearby neighbors. We encourage the University to update the necessary studies to ensure that the impacts upon these neighbors are properly mitigated and to coordinate with the Urbana Township Road District Commissioner to protect the public's investment in the township roads.

We appreciate the University's willingness to work with the City to hold public input meetings on this important project. It has been our observation that these meetings are helping residents to better understand the University's proposal and to make reasonable suggestions to help improve the project. Please feel free to contact me or my staff should you have any questions or concerns regarding our comments.

Sincerely

(Laurel Lunt Prussing, Mayor

Cc: President Mike Hogan
Trustee Christopher Kennedy
Interim Chancellor Bob Easter
Associate Chancellor Bill Adams
Urbana Township Road Commissioner Jim Prather
City Attorney Ron O'Neal
City Engineer Bill Gray
Community Development Director Libby Tyler

Attachment: Alternative Location



