



Illinois Department of Natural Resources

One Natural Resources Way Springfield, Illinois 62702-1271
www.dnr.illinois.gov

JB Pritzker, Governor
Colleen Callahan, Director

THIS LETTER IS FOR INFORMATIONAL PURPOSES ONLY. IT **DOES NOT** CONSTITUTE A FULFILLMENT OF THE CONSULTATION REQUIREMENT.

June 26, 2025

Dylan Haber
30 W Hubbard St
Suite 400
Chicago, IL 60654

Re: **Pebble Solar, LLC**
Consultation Program
EcoCAT Review #2513921
McHenry County

Dear Mr. Haber:

The Department has received your submission for this project 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. Due to the lack of information available at this stage in the proposed action, the Department is unable to initiate formal consultation. However, the Department does offer the following comments to be considered during the planning stages of this project.

The proposed action consists of a solar farm in McHenry County.

The Illinois Natural Heritage Database shows the following protected resources may be in the vicinity of the project location:

Illinois Natural Areas Inventory
Boloria Meadows INAI

Illinois Nature Preserves Commission Lands
Boloria Fen and Sedge Meadow Nature Preserve

State Threatened or Endangered Species
American Brook Lamprey (*Lethenteron appendix*)
Blanding's Turtle (*Emydoidea blandingii*)
Mottled Sculpin (*Cottus bairdii*)
Rusty Patched Bumble Bee (*Bombus affinis*)

Due to the project scope and proximity to protected resources the Department offers the following comments for your consideration:

Boloria Meadows INAI and Boloria Fen and Sedge Meadow Nature Preserve

The Department has determined impacts are unlikely for these sites.

American Brook Lamprey and Mottled Sculpin

EcoCAT has indicated records for the state-listed Mottled Sculpin and American Brook Lamprey in the vicinity of the project area. Due to the known occurrence of the Mottled Sculpin and American Brook Lamprey in the project area, the Department could recommend:

- No instream work. If instream work is necessary, the Department could recommend:
 - A survey be conducted in the project area by a qualified biologist to determine if these species is present. The survey should assess habitat types and include areas at least 100 yards upstream and downstream. The principal investigator should obtain a Scientific Collectors Permit and T&E Permit from the Department to conduct such work. A survey proposal should be sent to this office for concurrence on methods, along with the results for final comment.
 - Subsequently, if the Mottled Sculpin or American Brook Lamprey are identified during the survey, The Department recommends the project proponent seek an Incidental Take Authorization (ITA) pursuant to Part 1080 and Section 5.5 of the *Illinois Endangered Species Protection Act* for the Mottled Sculpin. All questions pertaining to ITA should be directed to the ITA coordinator, Heather Osborn (Heather.Osborn@Illinois.gov). Visit the link below for information on the ITA process: Incidental Take Authorizations - Species Conservation (illinois.gov) [Incidental Take Authorizations - Species Conservation \(illinois.gov\)](https://www.illinois.gov/Conservation/Pages/Incidental-Take-Authorizations.aspx)
 - Alternatively, the applicant may assume the presence and potential adverse effects to the Mottled Sculpin and American Brook Lamprey and seek an Incidental Take Authorization (ITA) pursuant to Part 1080 and Section 5.5 of the *Illinois Endangered Species Protection Act* to avoid potential liability.

Blanding's Turtle

EcoCAT has indicated records for the state-listed Blanding's Turtle in vicinity of the project area. The Department could recommend:

- Work on the project occurs during the turtle's inactive season from approximately November 1st to March 1st. If work must occur during the active season:
- Educate personnel working on site about the Blanding's Turtle. Post photos of juvenile and adult Blanding's Turtles at a central location. State-listed species may not be handled without the appropriate permits pursuant to the *Illinois Endangered Species Protection Act*.
- Install exclusionary silt fence by the end of March and maintain it through October (if needed) to prevent turtles from entering the construction area. Conduct daily inspections during construction to ensure that exclusionary fencing is properly installed (dug into the ground) and to check if turtles are present.
- Cover trenches at the end of each workday. Before starting each workday, trenches and excavations should be routinely inspected to ensure no turtles (or other amphibians and reptiles) have become trapped within them.
- If Blanding's turtles are encountered, crews should stop work immediately, allow the turtle to move out of the way and contact IDNR at (217) 785-5500.

Rusty Patched Bumble Bee

EcoCAT indicates a record of the state-listed Rusty-patched Bumble Bee occurs in the vicinity of the project. Department could recommend:

- Work which disturbs the ground or may remove flowering plants should be done between October 1st and April 1st to avoid potential impacts.

Please note that due to the federal status of the Rusty Patched Bumble Bee, and its potential occurrence in the project area, coordination with the U.S. Fish and Wildlife Service may be necessary and is separate from Illinois State consultation requirements and regulations.

The Department also offers the following conservation measures be considered to help protect native wildlife and enhance natural areas in the project vicinity:

- The Department strongly recommends that the project proponent establish pollinator-friendly habitat as groundcover wherever feasible. Solar Site Pollinator Establishment Guidelines can be found here:
- <https://dnr.illinois.gov/conservation/pollinatorscorecard.html>
- The site should be de-compacted before planting.
- Long term management of the site should be planned for prior to development to ensure successful native pollinator habitat establishment and prevent the spread of invasive species throughout the lifetime of this project. An experienced ecological management consultant should be hired to assist with long-term management.
- Required fencing, excluding areas near or adjacent to public access areas, should have a 6-inch gap along the bottom to prevent the restriction of wildlife movement. Woven wire or a suitable habitat wildlife friendly fence should be used. Barbed wire should be avoided.
- If tree clearing is necessary, the Department recommends removing trees between November 1st and March 31st to avoid impacts to the state-listed bats and birds.
- Any required night lighting should follow International Dark-Sky Association's (IDA) Five Principles for Responsible Outdoor Lighting to minimize the effect of light pollution on wildlife: [Five Principles for Responsible Outdoor Lighting | DarkSky International](#)

The Department is administratively closing this review unless the applicant desires additional information related to this proposal. The comments offered in this document are for informational purposes only. **This response does not meet the requirements of consultation for part 1075.** If this proposed action is authorized, funded, or carried out by State and local governments of Illinois, a new consultation should be initiated with the Department at such time that required project details are available.

Please contact Isabella Newingham (Isabella.newingham@illinois.gov) with any questions about this review.

Sincerely,



Bradley Hayes
Manager, Impact Assessment Section
Division of Real Estate Services and Consultation
Office of Realty & Capital Planning
Illinois Department of Natural Resources
One Natural Resources Way
Springfield, IL 62702
Bradley.Hayes@Illinois.gov
Phone: (217) 782-0031