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JAN 27 2022

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**Rhodes Creek Solar Project**  
**Case file: 2021-00127**

**To whom it may concern at the KY PSC,**

By the late 1800's-early 1900's Greater Sandhill Cranes had almost been extirpated from the eastern United States due to widespread overhunting and habitat loss. Protected since the 1930s this endangered species of cranes slowly began to make a comeback to some of its original territory. The spectacle of congregating cranes in Cecilia, Hardin Co. during Fall and Spring migrations is a result of the protection efforts, growing as the population has increased – attracting birders and photographers to the area to observe the cranes at close range.

If the solar project goes forward, “critical habitat” (ie.the agricultural fields) in the Cecilia area – needed by cranes during migration to forage and rest will be eliminated. Cecilia is one of only two major stopover areas in Kentucky, along with the Barren River area. This “staging” area can host thousands of cranes where they congregate for days or weeks to eat and rest on their journey. It affords both crane species – Sandhill Cranes and Whooping Cranes – foraging opportunities on waste corn/soybeans, invertebrates, etc. in the surrounding agricultural fields during the day, and provides night roosting areas for the cranes in the shallow, seasonal transient lakes that dot this karst region. Cecilia provides critical stopover habitat for the cranes during migration.

In the documents posted on the Kentucky Public Service Commission website there was only Phase 1 Environmental Assessment (Attachment 2: Critical Issues Analysis) for the Rhodes Creek Solar project. Has a final Environmental Assessment for the project been submitted? Not addressed in any of the material was the presence of 100's-1,000's (if not 10,000's) of Sandhill Cranes observed in the Cecilia area between December- March, with high numbers usually reported during Spring migration.

As part of the Environmental Assessment, based on the large numbers of cranes in the area of the proposed project, the International Crane Foundation recommends that surveys of roost sites be undertaken, and that a 2-mile buffer from roosting sites be allowed for foraging to take place.

Breeding grounds for the Eastern Population of Greater Sandhill Cranes are in Ontario Canada, Wisconsin, Michigan, and Minnesota making it unlikely that the *numbers* of those cranes would be negatively impacted by the project. Currently the status of the Eastern Population of Greater Sandhill Cranes is not “threatened” or “endangered.” However, the status of the Greater Sandhills that nest in Ohio was just down-listed from “endangered” to “threatened” in 2020. Tagged individuals in a 2009-2014 study were documented staging with eastern population cranes in Hardin County.

Whooping Cranes in the reintroduced Eastern Migratory Population, have been observed with groups of Sandhills in the proposed site area. These large, white cranes are part of the USFWS/Whooping Crane Eastern Partnership (WCEP) reintroduction program that began in 2001 in the eastern U.S. – Whooping Cranes were extirpated there in the early 1900's due to overhunting and habitat loss. Known as the Eastern Migratory Population of Whooping Cranes the cranes are part of the only existing population of the species in the world – less than 800 individuals (in both captivity and the wild). USFWS considers reintroduced populations as “experimental” because they are a safety backup to the federally endangered Aransas-Wood Buffalo “wild” population of Whooping Cranes that migrate between their breeding grounds in Wood Buffalo NP, Canada and its wintering area at the Aransas National Wildlife Refuge and surrounding coastal areas in Texas. But for all purposes, the Eastern Migratory Population is

considered rare and endangered and protected by the federal Migratory Bird Treaty Act. The International Crane Foundation, along with many partners, has invested millions of dollars and decades of time and expertise to bring Whooping Cranes back from the brink of extinction.

In response to the proposed merchant solar generating facility and related 1.5-mile-long transmission line, it is recommended by the International Crane Foundation that the transmission line (and any others) be marked with “diverters” to help prevent fatal line strikes. Diverters easily attach to the line and make the lines visible to cranes and other birds moving through the area. A documented case of the result of unmarked powerlines in Cecilia occurred on February 14, 2011. Ten Sandhill Cranes died from broken necks and other trauma after flying into powerlines that crossed above the water where they were roosting. It was thought that something spooked them off the roost at night causing them to fly into the lines. KDFWR undertook to mark the lines.

Thank you for providing the opportunity to comment.

Respectfully submitted,

Mary W. Yandell  
513 Lymington Court  
Louisville, KY 40243

• 2010 Founder of the non-profit group, “Kentucky Coalition for Sandhill Cranes” • Editor of the quarterly *Eastern Crane Bulletin* (2013-present) • Longtime member and past Board member of both the *Kentucky Ornithological Society* and the *Louisville Beckham Bird Club* • Active member of the *International Crane Foundation* • Actively involved with the *Eastern Population of Sandhill Cranes* since 2008 • Actively involved with the *Eastern Migratory Population of Whooping Cranes* since 2001.