

Chapter 3. Agriculture & Forestry

3.1. Introduction: Agriculture

About 89 percent of Illinois' cropland is considered prime farmland, ranking the state third nationally in total prime farmland acreage. Illinois ranks second nationally in exporting agricultural commodities. Agriculture in Illinois generates more than \$9 billion annually, with corn accounting for nearly 40 percent of that and soybeans about one-third. Livestock, dairy, and poultry are most of the balance. Billions more dollars flow into the state's economy from agriculture-related industries, such as farm machinery manufacturing, agricultural real estate, and production and sale of value-added food products.

In contrast to the overall socioeconomic importance of agriculture to the state, there is limited agriculture occurring in Illinois' Illinois Coastal Zone. Nonpoint pollution associated with agricultural operations is not significant. In addition, continued urbanization of the metropolitan Chicago area supports the conclusion that remaining agricultural areas will likely be developed or converted to forest preserves, public open space and parks in the future.

The NOAA and USEPA allow states to exclude some categories, subcategories or sources from the requirements of the coastal nonpoint program. Such exclusion may occur if:

- A nonpoint source category or subcategory is neither present nor reasonably anticipated in the Illinois Coastal Zone, or,
- A state can demonstrate that a category, subcategory or particular source of nonpoint pollution does not and is not reasonably expected to, individually or cumulatively, present significant adverse effects to living coastal resources or human health.

It would not be useful to develop priorities and strategies for a watershed activity that is not present nor expected to become a source of nonpoint pollution. Therefore Illinois requests a categorical exclusion for agriculture.

3.2. Request for Exclusion of Agriculture Category

3.2.1. Agricultural Land in the Coastal Zone

Historically agriculture in Illinois' Coastal Zone was undoubtedly important; today agriculture is a minor land use. According to the USDA's National Agricultural Statistics Service, cropland constitutes less than 0.7% of the coastal zone today; pasture accounts for another 0.5%. This proportion is expected to diminish in future years with continued urbanization of the Chicago metropolitan area. The trend in land use in the coastal zone involves conversion of cropland to residential, industrial, commercial and open space (parks, forest preserves). Table 3-1 summarizes agricultural land use (and other land covers/uses) for the Illinois Coastal Zone, as taken from the 2012 30 meter grid satellite imagery by the USDA.

Table 3-1 Agriculture Land Use in Illinois Coastal Zone

| Land Cover | Acres | Percent |
|-----------------------------------|----------|---------|
| Corn | 102.5 | 0.17% |
| Soybeans | 308 | 0.50% |
| Winter Wheat | 5.6 | 0.01% |
| Double Crop Winter Wheat/Soybeans | 6 | 0.01% |
| Alfalfa | 1.1 | 0.00% |
| Potatoes | 0.4 | 0.00% |
| Herbs | 1.8 | 0.00% |
| Pasture/Hay | 298.7 | 0.48% |
| All Other Land Uses | 61,044.9 | 98.81% |
| Total | 61,768.9 | 100% |

The 2014 Integrated Water Quality Report (IEPA 2014) does not indicate that cropland is a source of water quality impairment of any lake or stream in the Illinois Coastal Zone.

3.2.2. Animal Husbandry in the Coastal Zone

There is no commercial rearing of livestock in the Illinois Coastal Zone. The 2014 Integrated Water Quality Report (IEPA 2014) does not indicate that livestock areas are a source of water quality impairment of any lake or stream in the Illinois Coastal Zone.

3.3. Agriculture Conclusions and Recommendations

Information obtained from agencies at the federal, state and local levels strongly supports the exclusion of agriculture from Illinois' CNPCP. This conclusion is based on the following key factors:

- Cropland in Illinois' Coastal Zone is insignificant and is continuing to be lost to urbanization and restoration as parks and open space. The agricultural areas in the watershed are fragmented due to urbanization and becoming less viable as commercial operations.
- Nonpoint source inventories and data (305(b) and 303(d)) do not indicate that crop production or livestock rearing is a significant source of water quality impairment of any lake or stream in the Illinois Coastal Zone.
- Soil erosion that is occurring in the 6217 boundary area is more likely due to stream bank erosion caused by more extreme flow variation due to the increasingly impervious watersheds of the Chicago metropolitan area or to construction sites than agriculture. These NPS categories are addressed in other parts of this program.

Illinois has ongoing agriculture management programs that include NPS control management measures. Residents with small-scale agriculture can take advantage of these existing programs.

Based on these factors, agricultural activities are not significant nor are they foreseen, either individually or cumulatively, to present significant adverse impacts to coastal resources or human health in Illinois' Illinois Coastal Zone. And on this basis, Illinois believes a categorical exclusion for agriculture from its CNPCP is reasonable and warranted.

3.4 Introduction: Forestry

The NOAA and USEPA allow states to exclude some categories, subcategories or sources from the requirements of the coastal nonpoint program. Such exclusion may occur if:

- A nonpoint source category or subcategory is neither present nor reasonably anticipated in the Illinois Coastal Zone, or,
- A state can demonstrate that a category, subcategory or particular source of nonpoint pollution does not and is not reasonably expected to, individually or cumulatively, present significant adverse effects to living coastal resources or human health.

There is no commercial forestry in Illinois' Coastal Zone and nonpoint pollution associated with commercial forestry operations are nonexistent. In addition, continued urbanization of the metropolitan Chicago area supports the conclusion that no commercial forestry will occur in the future. It would not be useful to develop priorities and strategies for a watershed activity that is not present nor expected to become a source of nonpoint pollution. Therefore, based on the following information, Illinois believes a categorical exclusion for forestry is justified.

3.5 Request for Exclusion of Forestry Category

Most of the forestland in Illinois (more than 90%) is owned by private landowners. In the Illinois Coastal Zone, 28.04% of forested is on public land (state and local parks and forest preserves). The balance is small tracts of undeveloped private land (Table 3-2).

Table 3-2 Forestry Ownership in the Coastal Zone

| Owner | Number of Owners | Acres | Percentage |
|---------|------------------|--------|------------|
| Private | 1546 | 2487.5 | 71.96% |
| Public | 353 | 969.2 | 28.04% |

IDNR Division of Forestry records make no distinction between private versus public forest ownership. Forest ownership is divided among an increasing number of private owners. This fragmentation is attributed to continuing urbanization, which diminishes the efficiency of timber harvests. Larger areas that are less fragmented, are preserved by the state and local government, and are not used for commercial forestry. Existing highways and commuter rail lines facilitate new residential and industrial developments. Such development continues to divide forest areas and reduce the potential for future timberland harvests.

According to the IDNR Division of Forestry, there are no sawmills in the Illinois Coastal Zone. Cook County has no sawmills and Lake County has one specialty sawmill in Zion, IL, outside of the coastal zone. This facility contracts for small to mid-size logging and milling and reports that they occasionally harvest single trees from residential properties. They specialize in salvaged lumber, resawing, and custom millwork for the northern Chicago metropolitan area and southern Wisconsin.

In 1983 (and amended later), the Illinois General Assembly passed the Illinois Forestry Development Act (IFDA) (525 ILCS 15). The IFDA amended the Timber Buyers Licensing Act (225 ILCS 732/2), requiring that when timber or logs are sold the buyer shall deduct 4% of the purchase price from the payment to the timber grower an amount which equals 4% of the purchase price, and forward this fee to the IDNR, along with a report of the purchase on IDNR-approved forms. Consultation with the DNR Division of Forestry indicates a total absence of IFDA clients in Illinois' coastal zone.

3.6 Forestry Conclusions and Recommendations

Information obtained from agencies at the federal, state and local levels strongly supports the exclusion of forestry from Illinois' CNPCP. This conclusion is based on the following key factors:

- Commercial forestry in Illinois' Illinois Coastal Zone is insignificant or nonexistent. The wooded areas in the watershed are fragmented due to urbanization. Larger forests in the Coastal Zone are protected as parks and forest preserves.
- Sawmills do not exist in the Coastal Zone. Cook County has no commercial sawmills and Lake County has one, located outside the coastal zone.
- Individuals who reside in low-density suburban areas own small tracts of forestland. These small tracts are not conducive to efficient commercial logging. In most cases there is no desire to log the property.
- Harvest of timber, if it occurs will be extremely small scale (e.g. single trees), will occur infrequently, and if it occurs, is not likely to pose a significant nonpoint source pollution source.
- Nonpoint source inventories and data (305(b) and 303(d)) do not suggest that forestry management or timber harvesting activities are a source of water quality impairment of any lake or stream in the Illinois Coastal Zone.
- Soil erosion that is occurring within the Coastal Zone is more likely due to stream bank erosion caused by more extreme flow variation due to the increasingly impervious watersheds of the Chicago metropolitan area or to construction sites than forestry. These NPS categories are addressed in other parts of this program.

Illinois has ongoing urban forestry management programs that include NPS control management measures. Residents can take advantage of these existing programs.

Based on these factors, commercial forestry-related activities are not significant nor are they foreseen, either individually or cumulatively, to present significant adverse impacts to coastal resources or human health in Illinois' Coastal Zone. And on this basis, Illinois believes a categorical exclusion for forestry from its CNPCP is reasonable and warranted.