



Illinois Department of Natural Resources

One Natural Resources Way Springfield, Illinois 62702-1271
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Pat Quinn, Governor
Marc Miller, Director

April 16, 2010

Mr. James A. Cavanaugh
Illinois Dept. of Agriculture
2280 Bethany Road
Suite B
DeKalb, IL 60115

**Re: Gypsy Moth Control Plan – Aerial Application of *Bacillus thuringiensis kurstaki* (BtK)
(Site 7 of 8) – Romeoville
Endangered Species Consultation Program
Project Number(s): 1007032
County: Will**

Dear Mr. Cavanaugh:

This letter is in reference to one of the 27 Gypsy Moth Aerial Spraying blocks your Department submitted for consultation in accordance with 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. The location of this spray block is within Sections 13, 23, 24, 25, and 26, Township 37 North, Range 10 East. The project involves the aerial application of BtK two times during the last three weeks of May over a large area between Davey Road to the north, IL-53 to the west, and Des Plaines River to the south; the enclosed EcoCAT report shows the large spray area.

Within the spray block there are records for the State-listed endangered **Hine's Emerald Dragonfly**, *Somatochlora hineana*, and **Leafy Prairie Clover**, *Dalea foliosa*, both of which are also listed as Federally Endangered Species. Also within the spray block are records for the State-listed endangered **Blanding's Turtle**, *Emydoidea blandingii*; and **Spotted Turtle**, *Clemmys guttata*. Just outside the spray block are numerous records for the State-listed threatened **Slender Sandwort**, *Minuartia patula* and directly east of the spray area, about 600', is the **Black Partridge Woods Nature Preserve and Illinois Natural Area Inventory Site**.

BtK is an insecticide harmful to all moths and butterflies (Lepidoptera) that are in their larval caterpillar stage – caterpillars that ingest BtK as they consume leaves sprayed with BtK die when the BtK spores are activated in the insects' stomachs. It works by paralyzing the digestive system and the infected insects stop feeding within hours; the moths and caterpillars die from starvation, which can take several days. The Department is concerned that all native Lepidoptera species within the vicinity of this spray block will be killed, negatively impacting local Lepidoptera populations, adversely impacting food sources for birds, mammals, amphibians, and reptiles, and impacting pollinators of listed plants. Further, eradication of all Lepidoptera on this spray block site will increase Lepidoptera predation rates within the Nature Preserve as song birds, etc. will have to compete for a more limited supply of caterpillars within the Nature Preserve with which to feed their young.

The Department has completed its review of this project and determined that the action is not likely to have an adverse impact on the protected resources. Therefore, consultation under 17 Ill. Adm. Code Part 1075 is terminated. However, the Department recommends that the Department of Agriculture contact the US Fish and Wildlife Service to determine whether or not Section 7 Consultation is warranted regarding the federally listed Hines Emerald Dragonfly and Leafy Prairie Clover.

This consultation is valid for two years unless new information becomes available that was not previously considered; the proposed action is modified; or additional species, essential habitat, or Natural Areas are identified in the vicinity. If the project has not been implemented within two years of the date of this letter, or any of the above listed conditions develop, a new consultation is necessary.

The natural resources review reflects the information existing in the Illinois Natural Heritage Database at the time of the project submittal, and should not be regarded as a final statement on the site being considered, nor should it be a substitute for detailed site surveys or field surveys required for environmental assessments. If additional protected species are encountered during the project's implementation, you must comply with the applicable statutes and regulations. Also, note that termination does not imply IDNR's authorization or endorsement of the proposed action.

Please contact me if you have questions regarding this consultation review.

Cordially,



Kathi Davis
Division of Ecosystems and Environment
Impact Assessment Section
Office of Realty & Environmental Planning
217-785-5500

enclosure

cc: Kristopher Lah, USFWS/Chicago Office
Dan Kirk, IDNR/Region II/Natural Heritage
Joe Rogus, IDNR/Region II/Wildlife
Kelly Neal, Illinois Nature Preserves Commission
Kim Roman, Illinois Nature Preserves Commission