



# Illinois Department of Natural Resources

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

Pat Quinn, Governor  
Marc Miller, Director

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Mr. Kenneth Lynn, Consulting Environmental Scientist  
Ameren Services  
1901 Chouteau Ave.  
P.O. Box 66149, MC 635  
St. Louis, MO 63166

**RE: Illinois Rivers Project, Ipava-Meredosia Segment, Multiple Counties  
IDNR Environmental Resources Review  
EcoCAT Reports 1409760, 1409763, 1409774**

Dear Mr. Lynn:

This letter provides IDNR's comments resulting from its review of the approved (alternate) route between the Meredosia Energy Center and the proposed Ipava Substation for this portion of the Illinois Rivers Project 345-kV transmission line.

This review considered potential avian impacts; potential effects to species listed as endangered or threatened by the Illinois Endangered Species Protection Board and their essential habitats; potential effects to sites identified in the Illinois Natural Areas Inventory (INAI Sites); potential effects to State Parks; potential effects to large forest blocks or grasslands; and potential effects to wetland resources.

**Eagles. Bald Eagle, *Haliaeetus leucocephalus*.** More than 5,000 Bald Eagles, were present in Illinois during the Winter Count of 2014, shattering prior records. About 90% of these birds were concentrated along the Mississippi River, with most of the remainder concentrated along the Illinois River. Numerous Bald Eagle nests are known both upstream and downstream on the Illinois River in the vicinity of Meredosia in Morgan and Cass Counties.

**Golden Eagle, *Aquila chrysaetos*.** These birds are being reported in increasing numbers, as well, but are only winter residents. This species has been identified along the Mississippi River as far south as Monroe County in recent years. The Department is unaware of reports of this species along the approved route, but the presence of this species is likely, from time to time.

Both species are vulnerable to collision with power lines and electrocution while perching. *The Department recommends the design and configuration of the power line and its supporting structures employ the methods recommended by the Avian Power Line Interaction Committee (APLIC) to limit Eagle injury/mortality.*

As you know, each of these species is protected by the federal *Bald and Golden Eagle Protection Act*. *The Department recommends a late winter/early spring survey to assure that no new nests have been built within 660 feet of the proposed route, prior to beginning construction.* If such a nest is found, Ameren should promptly consult with the Fish & Wildlife Service to determine the best means of proceeding.

**Endangered Bats.** Wooded areas of Fulton, Schuyler, Brown, Cass, and Morgan County fall within the range of populations of the **Gray Bat**, *Myotis grisescens*; the **Indiana Bat**, *Myotis sodalis*; and the **Northern Long-Eared Bat**, *Myotis septentrionalis*. The Indiana Bat and Gray Bat are both federally-listed as endangered and state-listed as endangered. The Northern Long-Eared Bat will become federally-listed as endangered in October 2014, whereupon it will automatically become state-listed, as well. The USFWS has already issued guidance stating that those operations which may result in taking the Northern Long-Eared Bat after October 2014 should be treated as though they will take a listed species, beginning immediately.

**Gray Bat, *Myotis grisescens*.** The nearest Gray Bat records are from southern Pike County along the Illinois River. However, Gray Bats have been found hibernating as far north as the Blackball Mine in LaSalle County in recent years (2013), a site which lies outside the “accepted” range of this species. Hence, caves and mines along the Illinois River bluffs may provide habitat for this species. The Gray Bat is a true “cave bat,” roosting in caves and mines in both winter and summer. However, this species feeds along riparian corridors, often fifteen miles or more from its cave roosts. It should be presumed to feed along streams, sloughs, and riverbanks in the project area during the summer activity season, which extends from April through November.

**Indiana Bat, *Myotis sodalis*.** The Indiana Bat and the Northern Long-Eared Bat hibernate in caves and mines in the winter, but roost in trees during the summer activity season, which extends from late March through mid-November. The Indiana Bat has numerous recorded roost trees within the Jim Edgar Panther Creek State Fish & Wildlife Area in Cass County, and the species has been collected at several sites in Brown County. The deeply dissected and forested stream valleys of Schuyler and Fulton Counties provide suitable habitat but have not been subjected to intensive survey efforts. The species has been collected from Little Missouri Creek, a tributary of the La Moine River, in Schuyler County. It would be prudent to presume the Indiana Bat is present in suitable habitat throughout the Ipava-Meredosia Corridor.

**Northern Long-Eared Bat, *Myotis septentrionalis*.** The Northern Long-Eared Bat is more common than either the Gray Bat or Indiana Bat, and may be presumed to be present in suitable habitat throughout the Ipava-Meredosia Corridor. Its life history and behavior is very similar to that of the Indiana Bat.

*If a presumption of presence is rejected, the Department recommends mist-netting and acoustic surveys during June to characterize bat activity and populations along the route.* The approved route intersects wooded areas at many points. *To avoid violating protective statutes, tree-clearing should occur before April 1 or after November 15.* Tree removal between these dates is not unlawful, but should be preceded by mist-net and acoustic surveys to avoid felling any trees currently in use by Indiana Bats or Northern Long-Eared Bats. (Maternity colonies of these species will not be sharing a maternity roost.) Felling such trees while they are in use is a violation of both state and federal statutes. Northern Long-Eared

Bats may roost in trees as small as three inches diameter-at-breast-height (dbh), while Indiana Bats prefer larger trees (generally > nine inches dbh).

Mist-netting activities, which require permission from both federal and state agencies, should be supplemented by radio-telemetry. Female Indiana Bats forage *an average distance* of 2.5 miles from a primary roost tree. Hence, a mist-net capture of lactating females may not indicate a roost tree near the area of primary interest. Radio-telemetry aids in identifying the specific location of roosts.

Both state and federal statutes provide procedures for obtaining permission to take listed bats incidentally during other lawful activities, such as power line construction. However, the procedures differ in important respects, and state and federal permits must be obtained separately, if avoidance measures are deemed insufficient to guarantee no prohibited taking will occur.

**Other Endangered/Threatened Plants and Animals. Decurrent False Aster, *Boltonia decurrans*.** A number of populations of this federally-listed endangered plant are located along the floodplains of the Illinois River from LaSalle-Peru southward. This plant is present near the River and its backwaters in Morgan, Cass, Brown, Schuyler, and Fulton Counties. Decurrent False Aster is a biennial plant with wind-borne seeds which readily colonizes disturbed areas. A major cause of its decline is the conversion of many floodplains to agriculture.

As with other federally-listed endangered plants, the federal *Endangered Species Act* applies directly only to those plants found on federal property, such as the federal Fish & Wildlife Refuges. On non-federal lands, this and other federally-listed plants are protected consistent with applicable state law. In Illinois, such plants are automatically state-listed as endangered or threatened, which means “taking” such plants requires the written permission of the land owner as mandated by the *Illinois Endangered Species Protection Act*. The Illinois Department of Natural Resources is not empowered to authorize the take of such plants contrary to the desires of the land owner.

Consequently, *the Department recommends seeking permission to take from the owners of properties where such plants may be found.* Under Illinois law, the prohibited “taking” of a plant may be summarized as “to harm in any manner.” This encompasses such common maintenance activities as mowing and herbicide application, as well as other forms of physical damage and habitat modification.

**Regal Fritillary Butterfly, *Speyeria idalia*.** In recent years, large numbers of this State-listed threatened butterfly have been observed at the Meredosia Energy Center, along Yeck Road and Koch Lane near Meredosia, and at numerous other sites in the floodplains east of the Illinois River in Morgan and Cass Counties. [While the Department has not received reports of this species from the west side of the Illinois River, it is unlikely the River poses a barrier to butterfly movement.]

Although these populations appear to have been decimated by the drought of 2012, it is likely that suitable habitat has been or will soon be re-colonized by this strong-flying insect. Because of the complex life-history of this protected insect and the difficulty of avoiding prohibited taking where it may be abundant, **the Department recommends Ameren consider seeking an Incidental Take Authorization pursuant to Part 1080 of the Department’s Administrative Rules for the Regal Fritillary Butterfly.**

Female Regal Fritillaries deposit their small clusters of eggs on a variety of plants beginning in September, with each female depositing up to 1,000 eggs altogether. Newly hatched larvae fall to the ground and overwinter beneath vegetative detritus. In the spring, each larva must find a suitable host plant on which to feed. This species will feed only on plants in the *Viola* genus, but the violets must occur in the context of the equivalent of a tallgrass prairie community. After developing through five or six instars, the larvae pupate.

Male Regal Fritillaries (distinguishable by a slightly different hind-wing pattern) emerge as adults around the middle of June, with females emerging around the start of July. The two sexes commingle for about ten days, during which mating occurs, after which the males die. Females enter a condition known as “diapause,” in which egg development is delayed. Females must survive until the beginning of the oviposition period in September. To do so, they feed on the nectar of flowering forbs, which, being exceptionally strong fliers, they will fly far afield to find if they are not available locally. This is likely the major means of population dispersal. However, unless the flowering forbs are also in the vicinity of suitable host plants in an appropriate context, subsequent recruitment may not be successful.

The Department has observed that where forested areas are penetrated by roads and power line corridors, Regal Fritillaries can be found moving along such routes in what would otherwise be inhospitable habitat. Moving vehicles in such confined areas have a higher probability of striking butterflies.

All butterflies are noted for a behavior known as “puddling,” and the Regal Fritillary is no exception. Butterflies congregate on the ground at the edges of puddles, where they can extract necessary mineral nutrients from the soil. They are also attracted to fresh dung for the same purpose. Off-road vehicles moving at speed have the potential to strike and kill puddling butterflies before they can evade the vehicle.

During the egg and larval stages, this species is particularly vulnerable to fire and other disturbances of the habitat, such as herbicide spraying, mowing, and off-road vehicle use. Adults are vulnerable to unlawful collecting and to collisions with vehicles, because flowering forbs are often restricted to field margins along roadsides. Any regional catastrophe, such as drought, flooding, or a late freeze, can also severely restrict the availability of food plants. At all life stages, this species must contend with a variety of predators, as well as fungal and bacterial diseases.

In early summer 2012, Regal Fritillaries were reported emerging and flying from at least ten locations in western Morgan and Cass Counties, but none were observed after July 3, suggesting the extreme high temperatures of the severe late-summer drought suppressed these populations. However, provided habitat remains available, the Department expects these populations to rebound.

This species presents a challenge, not only to power line construction activities, but to on-going maintenance activities as well. While it is obvious that encounters will be much more likely in some localities than others, the flight abilities of this species means the possibility of an encounter may exist anywhere up to 20 miles of the site of adult emergence. The use of broad-spectrum broad-leaf herbicides also threatens the obligatory larval host plants and the flowering forbs required to sustain adults.

**Illinois Chorus Frog, *Pseudacris (streckeri) illinoensis*.** This is another ecologically interesting species which is abundant in the floodplains of Scott, Morgan, and Cass Counties, especially around Meredosia. Despite efforts to do so, no populations have been located on the west side of the Illinois River. The species is known to be averse to flowing waters, so that the Illinois River may pose an effective barrier to dispersal of this species to suitable habitat west of the River.

Although a member of the arboreal tree-frog family, the Illinois Chorus Frog is a fossorial species which spends most of its life underground, silent and out of sight. It has developed physiological adaptations which allow it to burrow forwards, in contrast to most amphibians, which burrow backward. However, given its small size, it is limited to burrowing in pure sand or predominantly sandy soils. Consequently, populations are generally limited to sand prairies found in glacial outwash areas of current or ancient river floodplains. Precisely such habitat dominates the Ipava-Meredosia power line route in Morgan and Cass Counties.

However, being an amphibian, the Illinois Chorus Frog requires water in which to lay its eggs, and water which remains long enough (about 60 days) for tadpoles to metamorphose into adults. The sandy soils in which it spends most of its time cannot sustain such pools. This species must undergo seasonal migrations to ephemeral or permanent bodies of standing water to successfully recruit juveniles. A study of 36 choruses of breeding Frogs found that most pools were within 200 meters of an area of sandy soil which would support burrowing, but movements up to 900 meters have been reliably reported. Movements to and from breeding ponds occur at night.

Illinois Chorus Frogs prefer breeding pools with a maximum depth of slightly more than one meter which contain plant debris or detritus from the prior growing season, and free of fish and other potential egg predators. Male Frogs cling to such debris while calling for mates, and mating occurs in the same context. Such pools can occur in roadside ditches and farmed wetlands, as well as vernal woodland pools.

Frogs emerge from underground and move to breeding ponds very soon after ice-melt, with calling and breeding beginning when body temperatures reach about 50 degrees Fahrenheit. Breeding can occur as early as February in warm winters, and as late as early May in cooler years. Breeding usually peaks in March and April.

Only the male Frogs engage in calling behavior. Although the Frogs themselves are small, their voices are not, and the most common method to survey for the presence of this species is to travel along roadways with periodic stops to listen for this species' distinctive call, which is audible for more than a mile. It is then possible to locate the breeding pond and to roughly estimate the number of males present and active that evening. Often, fewer than five or six males are present in a "chorus."

The drawbacks to this method of assessing populations are obvious. If conditions that spring are not conducive, the Frogs will not attempt to breed and their presence will go unremarked. Even where they are identified, reasonable estimation of population numbers is difficult. Moreover, dispersal areas can be only roughly inferred from the location of breeding ponds, and no indication of population density in dispersal areas can be derived. In addition, it has been shown successive years of good or poor breeding conditions can result in huge fluctuations in both population numbers and in the extent of territory

occupied. Consequently, the absence of the Illinois Chorus Frog from apparently suitable habitat during a single survey period is not a reliable guide to its presence in the past or future.

Very little is known about the behavior of this species once it goes underground. It has been demonstrated this species is capable of moving and feeding (on worms and soil insects) underground. Like its arboreal cousins, this species may share their ability to endure freezing and thawing with minimal harm. Nevertheless, the depth of its underground activity may vary seasonally, being deeper in winter and shallower in warmer seasons.

Large populations persist in areas almost entirely devoted to mechanized agriculture, although some popular herbicides, such as atrazine, are known to be highly toxic to it, suggesting the mechanical aspects of agricultural activities are generally compatible with this species' ecology. The fact that Frogs are generally underground when agricultural chemicals are applied may provide them some degree of protection from chemical toxicity.

*Given these characteristics, the Department presumes that all suitable sandy soils within 900 meters (slightly greater than half a mile) of a known breeding location are currently occupied by the Illinois Chorus Frog.*

This species has a number of vulnerabilities. Drainage "improvements" which drain or prevent flooding of breeding ponds are detrimental. Adults and juveniles crossing roads to breed or disperse are subject to road-kill and exposure to predators. Eggs and tadpoles are extremely sensitive to chemical pollution. Frogs deep enough underground are preserved from being crushed to some degree when heavy vehicles pass above, but excavations in dispersal areas have the potential to injure or kill Frogs which are present. Consequently, excavation and construction in suitable Illinois Chorus Frog habitat has a high probability of resulting in the prohibited taking of this species.

Known breeding locations exist directly adjacent to the Meredosia Energy Center and inside or within 900 meters of the proposed power line corridor throughout its length in Morgan and Cass Counties. The disturbance of known breeding sites should be avoided, but the dispersal distances and population densities within suitable soils are not known with any degree of certainty. The Department believes construction activities associated with the power line are likely to injure or kill some number of Illinois Chorus Frogs, despite efforts to avoid harming them. While it is possible current populations can sustain such losses, ***the Department recommends Ameren consider seeking an Incidental Take Authorization pursuant to Part 1080 of the Department's Administrative Rules for the Illinois Chorus Frog for actions associated with construction of the power line.***

**Hall's Bulrush, *Schoenoplectus (Scirpus) hallii*.** This annual sedge is quite rare in the United States; the greatest concentrations of known populations are located in Illinois, in the sandy regions of the Illinois River floodplains of Morgan, Cass, and Mason Counties, where the species was first described in 1863. Few populations are on public lands; private lands host the great majority of known populations.

Hall's Bulrush requires specific hydrologic and soil conditions to trigger germination. Its abundant seeds can lie dormant for many years, so that extensive populations one year may be entirely absent the next year or through succeeding years until appropriate conditions for germination once again prevail. A recorded population should be considered "extant" for at least 25 years since its last appearance.

In the spring of 1996, unusually high ground water conditions prevailed in the sandy floodplains around Beardstown. As the ground water table receded, dozens of populations of Hall's Bulrush appeared in hitherto unsuspected locations, demonstrating its long-term seed viability and its ability to respond to appropriate climatic conditions. Consequently, it is virtually impossible to determine this species is absent from suitable habitat based on recent observations of mature plants. It is possible a qualified botanist could identify the distinctive seeds of Hall's Bulrush through analysis of soil samples, but such a survey technique has not been discussed in the scientific literature and may be impractical.

As with other state-listed endangered plants, Hall's Bulrush may only be taken with the written consent of the land owner. Given the difficulty of ascertaining where and when this plant will express itself, *the Department recommends Ameren seek the written consent of land owners in Morgan and Cass Counties to take this species through construction and maintenance operations.*

Soil disturbances associated with construction may optimize or improve germination conditions in some locations. In the interests of maximizing the conservation of this plant, *the Department recommends periodic post-construction monitoring of the power line route in late summers to identify and avoid harm to populations of Hall's Bulrush which appear within the right-of-way in the future.*

In addition it is important not to distribute invasive or exotic plants into habitats required for native species, and it is equally important to not carry seeds of listed species into inhospitable environments. Mud on vehicle tires and other equipment surfaces is a primary means of inadvertent and unwanted seed dispersal. *The Department recommends that construction equipment used on the project be cleaned daily to limit inadvertent seed dispersal.*

**Patterson's Bindweed (Dawnflower), *Stylisma pickeringii* var. *pattersoni*.** Patterson's Bindweed is one of the rarer plants listed as endangered in Illinois, with only five known occurrences. One of these locations is along US Route 67 just one mile northeast of the point the power line will cross the highway in Cass County. While it is clear the power line's construction is unlikely to disturb the known location of the nearest population, the potential exists to disturb other, unknown, locations which may exist along the power line corridor.

The history of the Route 67 population is instructive. In 2005, the site was visited by a botanist attempting to relocate a single plant reported ten years before. He was unable to locate any plants and recommended that no further searches be undertaken because, in his opinion, land owner modifications to the area made it likely the species had been extirpated at this location.

Nevertheless, the site was visited by another botanist the following summer, who found a robust population of more than 1,000 plants covering several hundred square meters along the edge of a corn field, the largest population ever found in Cass County.

Although Patterson's Bindweed is a perennial, rather than an annual, both climatic and ecological conditions must be suitable for it to thrive, rather than to merely persist. When conditions are not suitable, it may appear to be completely absent, but may be able to survive for several years awaiting optimal conditions. This species is an early successional plant which requires nearly-bare ground and

little competition from other plants. Periodic fires and floods may be necessary under natural regimes to create disturbances which provide suitable conditions.

Consequently, it may be possible that power line activities may create sufficient disturbance for unknown populations of Patterson's Bindweed to express themselves following construction.

As with other state-listed endangered plants, Patterson's Bindweed may only be taken with the written consent of the land owner. Given the difficulty of ascertaining where and when this plant will express itself, the Department recommends Ameren seek the written consent of land owners in Morgan and Cass Counties to take this species through construction and maintenance operations.

Soil disturbances associated with construction may optimize or improve germination conditions in some locations. In the interests of maximizing the conservation of this plant, *the Department recommends periodic post-construction monitoring of the power line route in late summers to identify and avoid harm to populations of Patterson's Bindweed which may appear within the right-of-way in the future.*

**Bent (Ozark) Milk Vetch, *Astragalus distortus*.** Yet a third rare plant is located in the project area. In 2012, 95 individual plants of this species were found growing within the grounds of the Meredosia Energy Center, near the substation which will support the Ipava-Meredosia power line. This discovery was not the product of a general survey of the vicinity, but was incidental to an effort to quantify the suitability of this area as Regal Fritillary habitat.

As previously noted, endangered plants are protected by law only to the extent of prohibiting taking of the plant without the express written permission of the land owner; the owner remains free to manage or dispose of the plants as the owner sees fit. In this case, the owner of the Meredosia Energy Center has the power to destroy or conserve this population without interference from local, state, or federal authorities (except to the extent that actions adversely affecting the plants are federally-funded or state-funded—agencies can specify the conditions under which their funds can be expended).

IDNR strongly recommends the owner of the Meredosia Energy Center take steps to protect and conserve this population of Bent Milk Vetch. Such measures could include protecting the locations of individual plants from mowing, herbiciding, grading, construction, or other such disturbances; collecting seeds or translocating a subset of individual plants to attempt establishment of the plant in additional more convenient locations elsewhere within the property, or working with agencies or conservation organizations to translocate and establish populations on lands where the plants would be at less risk.

This begs the question, however, of whether other populations of this plant exist along the approved power line route, on lands owned by others. Because unnoticed individual plants may exist along the route the Department recommends Ameren seek the written consent of land owners in Morgan and Cass Counties to take this species through construction and maintenance operations. Further, Ameren should authorize contractors and other agents to take this species on lands it owns under the conditions Ameren specifies.

**Northern Harrier, *Circus cyaneus*; Short-Eared Owl, *Asio flammeus*.** The Illinois Department of Transportation owns a large tract of land southwest of the confluence of the Illinois River and the La Moine River in Brown County, designated as the LaGrange Wetland Bank. The approved power line

route passes just to the northeast. The Wetland Bank serves as a winter roosting area for numbers of Short-Eared Owls and Northern Harriers.

While the power line will in no way diminish the value of the wetland bank as winter habitat for these ground-roosting species, power line construction and maintenance crews should be aware that these species may be present in similar grassland habitat in the vicinity. This may be more important for those segments of the power line in Fulton County, which pass near large tracts once strip-mined for coal and reclaimed to grassland, which are often used by these species.

**Illinois Natural Area Inventory (INAI) Sites.** The **Meredosia Refuge INAI Site** extends from the north side of the Village of Meredosia for more than seven miles along the east bank of the Illinois River in Morgan and Cass Counties. A portion of the eastern part of this land is owned by the Department of Natural Resources and is designated as the **Meredosia Lake State Fish & Wildlife Area**. The remainder of the INAI Site and some additional lands comprise the federal **Meredosia National Fish & Wildlife Refuge**. The approved route approaches the INAI Site no nearer than two miles, so that the construction and operation of the power line are unlikely to have any adverse effect.

The **Meredosia Hill Prairie INAI Site** is also owned by the IDNR and is synonymous with both the **Meredosia Hill Prairie State Natural Area** and the **Meredosia Hill Prairie Nature Preserve**. It consists of 34 acres on the bluffs at the junction of Trones and Arenzville Roads in Morgan County, and provides essential habitat for five species of state-listed plants and insects. The power line route passes just over 1.5 miles west of the Meredosia Hill Prairie. It will be clearly visible but will not otherwise affect the INAI site.

The **Frederick Road INAI Site** consists of 14 acres of wetlands just southeast of unincorporated Frederick in Schuyler County. The site supports a population of the federally-listed Decurrent False Aster. The power line route passes one-half mile to the northwest on the opposite side of Frederick, and will not adversely modify the Frederick Road INAI Site.

The **Browning Woods INAI Site** is located on the west bank of Sugar Creek about two miles north of Frederick in Schuyler County. Noted for its mesic and dry-mesic upland woods community, Browning Woods is located one-half mile west of the power line route and will not be adversely modified.

The **Sugar Creek INAI Site**, located about a mile north of Browning Woods in Schuyler County, provides essential habitat for a state-listed endangered plant. It is three-quarters of a mile west of the power line route and will not be affected.

The **Diers Seep Spring INAI Site**, located about three miles south of the proposed Ipava Substation above the west bank of Jake Creek, is also designated as the **Diers Seep Spring Natural Heritage Landmark**. Diers Seep Spring is 0.8 miles east of the power line route and the deeply dissected terrain assures that power line construction will not adversely affect the spring or its ground water recharge area.

**Dedicated State Nature Preserves and Land & Water Reserves.** As noted, the viewshed of the **Meredosia Hill Prairie Nature Preserve** in Morgan County will be altered by the construction of the

power line, but this is not prohibited. There are currently no other Nature Preserves or Land & Water Reserves within view of the power line route.

**State Parks.** As noted, the **Meredosia Lake State Fish and Wildlife Area** is located north and west of the power line route near Meredosia in Morgan and Cass Counties, as well as the **Meredosia Hill Prairie State Natural Area** in Morgan County. In southern Schuyler County, the route is 1.5 miles west of the **Sanganois State Fish and Wildlife Area**, located east of the Illinois River in Cass and Mason Counties. None of these parks will be adversely affected by power line construction.

**Forest or Grassland Blocks.** Numerous blocks of contiguous forest occur along and in the vicinity of the approved power line route. Some forest fragmentation will be associated with this project, but the many of the existing blocks do not appear large enough to support area-sensitive interior forest migratory birds. Fortunately, much of the route follows existing power line routes, and this should minimize the necessity of additional forest clearing.

Significant grasslands exist at the LaGrange Wetland Bank in Brown County, and on numerous reclaimed strip mines in Fulton County. However, the power line route avoids direct impacts to grasslands.

**Wetland Resources.** Numerous and extensive wetlands, farmed and otherwise occur along the approved route, especially near the Illinois River and along the route in Morgan and Cass Counties. Power line construction is unlikely to alter their hydrologic characteristics, but their unique location in sand prairies significantly raises the probability that each wetland provides essential habitat for one or more state-listed endangered or threatened plants and animals. Reasonable measures should be employed to avoid undue disruption of wetland soils during construction.

The Department of Natural Resources appreciates this opportunity to comment on the potential wildlife issues facing this project. Should there be any questions, please do not hesitate to contact me.

Sincerely,



Keith M. Shank  
Division of Ecosystems and Environment  
[keith.shank@illinois.gov](mailto:keith.shank@illinois.gov)  
(217) 785-5500