



Illinois Department of Natural Resources

One Natural Resources Way Springfield, Illinois 62702-1271
<http://dnr.state.il.us>

Pat Quinn, Governor
Marc Miller, Director

December 4, 2014

James Kelley
Rock Island USACE
P.O. Box 2004
Rock Island, IL 61204 2004

RE: Beardstown Maintenance Dredging, Dike Construction & Wetland Mitigation
Project Number(s): 1506461 (CEMVR-OD-P-2014-821)
County: Cass

Dear Mr. Kelley:

The Illinois Department of Natural Resources, Impact Assessment Section has reviewed the above mentioned Public Notice dated November 6, 2014. Comments to the City of Beardstown on the portion of the project involving the marina have already been provided through the Office of Water Resources permit application process (Permit Application S20140126). The intention of this letter is to provide comments on the proposed wetland mitigation plan.

Wetland Mitigation Plan

The wetland mitigation plan involves enhancement of a 2.0 acre impaired wetland dominated by reed canary grass (*Phalaris arundinaceae*) to mitigate for 0.50 acres of impacts to palustrine emergent wetlands resulting from the construction of dikes in the marina area. Enhancement will be achieved by installing a culvert pipe under Boulevard Road to allow water and seed exchange with the high quality wetland to the west. The culvert under St Luke Drive will be cleaned or replaced to connect the wetland to the north. Additionally, the City plans to eradicate the invasive plants with herbicide and disc the impaired wetland, followed by replanting with an approved wetland seed mix. A 25-foot grass buffer will be established around the wetland.

INAI & Natural Heritage Landmark

The mitigation site is adjacent to the Beardstown Marsh - Illinois Natural Area Inventory (INAI) site and The Slough - Natural Heritage Landmark. The INAI site is a category II, meaning specific suitable habitat for state-listed species or state-listed species relocations exists. These designations carry no special legal status.

Illinois Chorus Frog

Records as recent as the spring of 2014 occur throughout the project area for the state-threatened Illinois chorus frog (*Pseudacris illinoensis*). The Illinois chorus frog is known to hibernate buried in sandy soils and emerge in late winter and early spring to breed in wetlands. The Department is concerned about impacts to this species resulting from the proposed wetland enhancement project. In particular, diking of the wetland may result in "take" of this listed species.

The Department investigated soil types and reviewed the Wetland Delineation Report by Mr. Tharran Hobson of The Nature Conservancy. The Department has determined that the frog is not likely to hibernate, but is likely to breed within the impaired wetland. The frog is also known to breed within the

adjacent wetlands. The Department recommends no disturbance activities (including herbicide application, disking, and culvert work) be conducted in any wetlands from February 15th through July 31st to prevent impacts to this species. Areas with sandy soils should not be traversed with heavy equipment to avoid soil compaction and entombing the frogs. If these recommendations cannot be accommodated, the Department recommends the City of Beardstown seek Incidental Take Authorization (ITA) for the Illinois chorus frog. Please contact Jenny Skufca (Jenny.Skufca@illinois.gov) for all matters pertaining to ITA.

Wetland Birds

Records of the state-endangered common moorhen (*Gallinula chloropus*) and state-threatened least bittern (*Ixobrychus exilis*) also exist in the project vicinity. These species' are not likely to nest in the impaired wetland based on the current conditions, but may nest in the adjacent wetlands. The Department recommends no work on the culverts to connect the adjacent wetlands occur from May 1st through August 31st to protect the nesting season of these species'.

Herbicide

The Department recommends a low residual herbicide labeled for aquatic use be used for treatment of the invasive reed canary grass to reduce environmental impacts.

Recommendations Summary

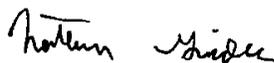
In summary, the Department recommends no disturbance activities be conducted in any wetlands from February 15th through July 31st to prevent impacts to the state-threatened Illinois chorus frog. Additionally, the culvert replacement project should not occur until after August 31st to protected state-listed wetland birds in adjacent wetlands. A low residual herbicide labeled for aquatic use should be used and avoid traversing sandy soils with heavy equipment to prevent soil compaction.

Given these recommendations are adopted, the Department has no objection to issuance of a USACE permit and approval of the wetland mitigation plan. The Department requests notification if the City of Beardstown plans to modify the proposed action to accommodate these recommendations or proceed as originally planned.

Please note that this review does not preclude permit decisions made by the IDNR Office of Water Resources under the Illinois Rivers, Lakes, and Streams Act.

Thank you for the opportunity to comment. Please contact me if you have any questions regarding this review.

Sincerely



Nathan Grider
Biologist
Impact Assessment,
217-524-0501

cc: Mike Diedrichsen (IDNR, OWR)
Jenny Skufca (IDNR, ORC)
Ray Geroff (IDNR, ORC)
Darren Gove (IEPA)
Jon Duyvejonk (USFWS)