



Illinois Department of Natural Resources

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

Bruce Rauner, Governor
Wayne A. Rosenthal, Acting Director

January 26, 2015

Mr. Kip Troeger
NEPA/Cultural Resources Manager
Illinois Army National Guard
Camp Lincoln
1301 N. MacArthur Blvd.
Springfield, IL 62702

**RE: Proposed Perry County Local Training Area, Pinckneyville, Perry County
Endangered Species Consultation Program
EcoCAT Review # 1507964**

Dear Mr. Troeger:

This letter addresses the consultation between the Illinois Army National Guard and the Illinois Department of Natural Resources required by 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*, as well as a wetland impact evaluation pursuant to the *Interagency Wetland Policy Act of 1989* and Title 17 *Illinois Administrative Code Part 1090*.

The Department has determined the activities described for the proposed Perry County Local Training Area are unlikely to adversely modify any characteristics of wetlands currently existing near the parcel being evaluated. Therefore, the facility will be in compliance with Title 17 *Illinois Administrative Code Part 1090* and that aspect of the consultation is closed.

The proposed Local Training Area currently is not known to support any State-listed endangered or threatened species. However, the parcel contains suitable habitat for currently-listed species and species proposed for listing by the Illinois Endangered Species Protection Board. The Department recommends biological surveys for these species at appropriate seasons of the year to determine whether such species are present and, if so, to support further action which may be necessary for the parcel to serve its designated mission.

The parcel contains suitable habitat for the **Indiana Bat**, *Myotis sodalis*, which is known to occur at other locations in Perry County. Although the wooded portion of this parcel is small, its location near the much larger woodlands associated with nearby Opossum Creek makes its use by this species more likely. This species is listed as endangered by the U. S. Fish & Wildlife

Service and as endangered by the Illinois Endangered Species Protection Board [Title 17 *Illinois Administrative Code* Part 1010].

The parcel contains suitable habitat for the **Northern Long-Eared Bat**, *Myotis septentrionalis*, also known to be present in Perry County. This species has been proposed for listing as endangered by the U.S. Fish & Wildlife Service, with a final determination currently due by April 2, 2015. This species has been proposed for listing by the Illinois Endangered Species Protection Board as “threatened,” with final listing pending publication of revised Title 17 *Illinois Administrative Code* Part 1010 in the Illinois Register. Please note that these listing actions are independent. Regardless of federal action, the species will be listed in Illinois.

The parcel contains suitable habitat for the **Chuck-Will’s-Widow**, *Caprimulgus carolinensis*, whose summer breeding range includes Perry County. This species has been proposed for listing by the Illinois Endangered Species Protection Board as “threatened,” with final listing pending publication of revised Title 17 *Illinois Administrative Code* Part 1010 in the Illinois Register.

Depending on the age and condition of individual trees, the parcel may contain suitable nesting habitat for the **Barn Owl**, *Tyto alba*, which is known to occur several miles south of the proposed training area. This species is listed as “endangered” by the Illinois Endangered Species Protection Board. The Board currently proposes listing this species as “threatened.” However, the State statute does not provide differing levels of protection for each status.

The Indiana Bat and the Northern Long-Eared Bat both hibernate in caves and mines in the winter, but reproduction, foraging, and summer roosting occur in woodlands. Most of the activities described as planned for the Local Training Area are unlikely to adversely modify the essential habitat of these species, but the removal of trees when the bats are present could result in prohibited incidental taking, as might the use of munitions which produce smoke. The preferred method to test for the presence of these species is mist-netting, in which local bats are captured for identification/telemetry tracking. (Tracking identifies specific roost trees and territories used by local colonies; territories may encompass several square miles. The *average* foraging radius for a colony is thought to be 2.5 miles.) This technique requires that persons engaged in such studies possess scientific collection permits issued by the Department of Natural Resources pursuant to Title 17 *Illinois Administrative Code* Parts 520 and 1070. Similar permits will also be required from the U.S. Fish & Wildlife Service. *The Department recommends the Illinois Army National Guard consider mist-netting surveys for this parcel.*

The Chuck-Will’s Widow is a ground-nesting nighthawk which hunts nocturnally; it is extremely well-camouflaged among leaf litter and brush. *Activities described as planned for the Local Training Area are likely to adversely modify the essential habitat of these species, and are also likely to result in prohibited incidental taking if birds are flushed or harassed, or if nests are inadvertently disturbed or eggs destroyed during training exercises.*

The Department recommends the Illinois Army National Guard consider biological and acoustic surveys of this parcel during the summer breeding season to determine whether the Chuck-Will’s Widow is present. Persons engaged in such studies, which are likely to flush or otherwise harass

the bird, must possess scientific collection permits issued by the Department of Natural Resources pursuant to Title 17 *Illinois Administrative Code* Parts 520 and 1070.

If this species is determined to be present, the Guard would have the option to suspend any training activities during the breeding season or to seek an Incidental Take Authorization (ITA) from the Department of Natural Resources pursuant to Title 17 Illinois Administrative Code Part 1080.

The Barn Owl is a migratory bird which nests in tree cavities, but also often nests in human structures, from which it derives its name. Its abundance is directly tied to the abundance of small rodent prey species. When prey is abundant, the species may produce two or more broods per year; owl populations crash when rodent populations do. Thus, if suitable nesting spaces are present, in some years they may or may not be occupied by this species, depending on rodent populations. Conversion of the existing agricultural field to grassland will increase rodent populations, and increase the probability the site will be occupied by Barn Owls. Because Owls cannot digest all portions of their prey, a nest location is likely to be marked by owl “pellets” on the ground, consisting of dense accretions of teeth, bones, and fur.

Barn Owls are generally tolerant of human activities and are unlikely to be disturbed by most training activities which do not entail scaling their nest tree, or felling it. The greatest potential threat may be collisions with vehicles, since most flights at twilight and later are low to the ground.

The Department recommends the Illinois Army National Guard consider biological and acoustic surveys of this parcel during the summer breeding season to determine whether the Barn Owl is present. Persons engaged in such studies which entail efforts to capture or handle the bird or its offspring must possess scientific collection permits issued by the Department of Natural Resources pursuant to Title 17 *Illinois Administrative Code* Parts 520 and 1070.

If initial surveys are not performed or do not find these species, *trainees should receive indoctrination on their appearance and habits to enable them to recognize and report them if the species are encountered during their training.*

This parcel has not been actively managed to maintain or enhance biodiversity, or to detect and control exotic nuisance plants, such as Kudzu or Japanese Honeysuckle. If the parcel is acquired, an Integrated Natural Resources Management Plan (INRMP) should be developed which includes initial floristic and faunal inventories and identifies management activities, which may include the use of herbicides and prescribed fire, to restore and enhance the local ecosystem.

Consultation on the part of the Department is closed, unless the Illinois Army National Guard desires additional information or advice related to this proposal. In accordance with 17 Ill. Adm. Code 1075.40(h), the Guard must notify the Department of its decision regarding these recommendations, whether it will:

- Proceed with the action as originally proposed;

- Require the action to be modified per Department recommendations (please specify which measures if not all will be required); or
- Forgo the action.

This consultation is valid for two years unless new information becomes available which was not previously considered; or the proposed action is substantially modified; or additional species, essential habitats, 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 resource review primarily reflects the information existing in the Illinois Natural Heritage Database at the time of this consultation, 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 resources are encountered during the project's implementation, the applicant must comply with the applicable statutes and regulations. Also, note that closing consultation does not imply IDNR's authorization or endorsement of the proposed action. Please contact me if you have questions regarding this review.

Sincerely,

A handwritten signature in black ink that reads "Keith M. Shank". The signature is written in a cursive style with a large initial "K" and "S".

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