



# Illinois Department of Natural Resources

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

Bruce Rauner, Governor  
Wayne A. Rosenthal, Director

November 30, 2015

Beckie Maddox  
Exelon Generation Company, LLC  
4300 Winfield Rd.  
Warrenville, IL 60555

**RE: Water Intake Dredging Project**  
**Project Number(s): 1603406 [1507944]**  
**County: Will**

Dear Ms. Maddox:

The Illinois Department of Natural Resources has reviewed the above-mentioned project involving dredging at the Braidwood Nuclear Station, Kankakee River intake. Pursuant to the Fish & Wildlife Coordination Act, the Department provides the following comments:

Records of the state-listed mussels black sandshell (*Ligumia recta*), purple wartyback (*Cyclonaias tuberculata*) and state and federally-endangered sheepnose (*Plethobasus cyphus*) occur in the vicinity. Records for the state-listed river redhorse (*Moxostoma carinatum*), pallid shiner (*Hybopsis amnis*), western sand darter (*Ammocrypta clarum*), and mudpuppy (*Necturus maculosus*) also occur in the project vicinity.

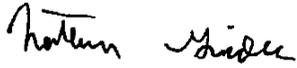
A mussel survey was conducted by Ecological Specialists Inc. on November 5, 2015 in which black sandshell were identified in area 8 of the proposed dredging project. Area 3 directly in front of the screen house resulted in only one mussel collected and no listed mussels present.

Exelon proposes to mechanically dredge only area 3 at this time and pursue Incidental Take Authorization (ITA) for dredging the remaining area in which state-listed mussels are present. The Department has no objection to this approach and recommends silt currents be placed around area 3 to prevent sediment from impacting protected mussel resources downstream. Based on the mussel survey and habitat characteristics, the Department has determined that mechanically dredging area 3 is unlikely to impact state protected natural resources given the above recommendations are followed.

However, The Department recommends Exelon pursue ITA for the state-listed mussel species and evaluate potential impacts to the state-listed fishes for further dredging outside of area 3. An outstanding issue remains with the reported "take" of state-listed fishes through impingement at the intake as mentioned in the Department's May 12, 2015 letter (attached). The Department recommends Exelon apply for an ITA to mitigate for all of the Braidwood facility operations in the Kankakee River in the immediate future as the facility may be at risk of penalties under the *Illinois Endangered Species Protection Act* [520 ILCS 10/11].

Please note that this review is separate and distinct from any other action or regulatory authority of the Department.

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

A handwritten signature in black ink that reads "Nathan Grider". The signature is written in a cursive style with a large initial 'N'.

Nathan Grider  
Impact Assessment Section  
217-785-5500

cc: Julie Rimbault – USACE  
Jenny Skufca - IDNR