



Illinois Department of Natural Resources

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

Bruce Rauner, Governor
Wayne A. Rosenthal, Director

October 30, 2015

Megan Briggs
Christopher B. Burke Engineering, Ltd.
9575 W. Higgins Road, Suite 600
Rosemont, IL 60018

RE: ComEd NERC Distribution Project
Project Number(s): 1603600 [040532.00651]
County: DuPage

Dear Ms. Briggs:

The Illinois Department of Natural Resources has reviewed the above-mentioned project involving relocation of four utility poles within a wetland area.

Recent records of the state-endangered and federally-threatened eastern prairie fringed orchid (*Platanthera leucophaea*) and state-endangered tube beard tongue (*Penstemon tubaeflorus*) exist in a nearby wetland approximately 2,000 feet away. The wetland in which the work is proposed may be of different habitat characteristics and quality, and thus, not support these listed plant species. A habitat assessment and/or plant survey would be needed to determine presence.

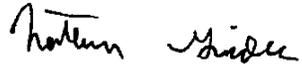
However, state-listed plant species belong to the landowner and their fate resides with the landowner's conservation decisions. An alternative to the survey, which often can only be conducted during times of the year when plants are flowing, is to proceed with mitigation measures and obtain written permission from the landowner, if applicable, to "take" state-listed plants. The Department recommends the disturbance area remain as small as feasible and ground protection matting be placed to reduce plant and soil disturbance. Topsoil should be kept separate from subsoil and used to reclaim disturbed areas. BMP's should be used for sediment and erosion control. If seeding is necessary, the mixture should contain native species representative of the habitat type. If listed plants can be identified, they should be relocated out of the disturbance area, but within the same habitat and property area, when conditions are appropriate. Seeds can also be collected and distributed in the disturbed area to encourage recolonization.

These recommendations do not pertain to federal regulations concerning the federally-threatened eastern prairie fringed orchid.

Given these recommendations are adopted, the Department has no objection to issuance of a U.S. Army Corps of Engineers permit.

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.

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, slightly slanted style.

Nathan Grider
Impact Assessment Section
217-785-5500

cc: Stasi Brown - USACE