

United States
Department of
Agriculture

1902 Fox Drive
Champaign, IL
61820

Subject: Draft Environmental Impact Statement (EIS), Proposed August 30, 2001
Land and Resource Management Plan for Midewin National
Tallgrass Prairie NRCS Environmental Docket Number 2473

To: Marta Witt, Public Affairs Officer, Midewin National File Code: 180
Tallgrass Prairie, 30071 South State Route 53,
Wilmingon, IL 60481

The USDA-Natural Resources Conservation Service has reviewed the above Draft EIS, and have the following comments and suggestions.

1. Recommend that in all sections of the "Draft" EIS that all land slopes be described as gently to moderately rolling.
2. Consideration be made for drain tiles that begin upstream, and continue through the present Midewin Tallgrass Prairie. Breaking tile lines on the Midewin may have severe drainage impacts to upstream agricultural/urban landowners. We suggest working with these neighbors and develop a plan that minimizes the impacts to agricultural drainage while meeting the desired future conditions of the Midewin. This is discussed in Chapter 2, Page 2-12, 4th paragraph.
3. Chapter 3 comments and suggestions:
 - Page 3-12 3rd para Midewin watershed delineation..., also used by .. add **USDA/NRCS, ...**
 - Page 3-13 3rd para **The soils and hydrological characteristics of the four** etc. The soil function has been impacted very little due to agricultural activities.
 - Page 3-13 1st para Suggest changing to read... Watersheds of, fine grained soils **that are somewhat poorly and poorly drained and areas of moderately well drained.**
 - Page 3-12 2nd para Suggest changing to read "**The water table varies across the Midewin with some areas having water at or near the surface while others have a deeper depth, usually exceeding.**"
 - Page 3-36 Soils, Affected Environment, 2nd para Evidence of past sheet erosion or soil deposition. Suggest the sentence read **Evidence of soil deposition is...**
 - Page 3-36 Soils, Affected Environment, This section deals with soil resource base and should include the following under Affected Environment 2nd para. A land management plan was developed in 1964 with assistance from the USDA/Natural Resources Conservation Service formerly known as the Soil Conservation Service. All cropland and grazing land areas were planned to "T" using the Universal Soil Loss Equation (USLE) to reduce soil erosion and protect the resource base. Conservation planning systems using the Field Office Technical Guide included crop rotation, crop residue management, conservation tillage, addressed sheet and rill erosion while grass waterways and structures addressed gully erosion. Pasture seeding and management were provided for grazing land areas and 15% of each section was designated for planning wildlife habitat. Later the plan was updated and called a Resource Management Plan. Plan implementation was assured by the Land Manager to meet the planning criteria.
 - Page 3-37 1st sentence Eliminate **Rill erosion is presently rare etc. since a conservation plan was in place and addressed this type of erosion.**

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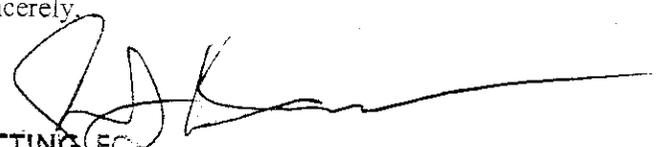
Page 3-37 Suggest changing top para last sentence to "**Cultivated fields have experienced soil loss due mainly to water erosion which has resulted in soil loss and deposition in some areas.**"

4. Add to the glossary the following:

Soil Loss Tolerance - is the maximum amount of soil loss, in tons/acre/year, that a given soil type can tolerate and still permit a high level of crop production to be sustained economically and indefinitely. Allowable soil loss rates for the Midewin are 3-5 tons per acre per year.

Thank you for the opportunity to comment on this project.

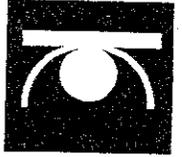
Sincerely,



ACTING FC
WILLIAM J. GRADLE
State Conservationist

cc:

- Tony Kramer, Assistant State Conservationist, NRCS, Champaign
- Bill Lewis, Planning Team Leader, NRCS, Champaign
- Paul Krone, Environmental Specialist, Champaign
- Bob Jankowski, District Conservationist, New Lenox



M-67

September 24, 2001

Marta Witt, Public Affairs Officer
Midewin National Tallgrass Prairie
30071 S. State Route 53
Wilmington, IL 60481

Dear Marta,

I will begin by apologizing for my comments being late, but I hope my input will be useful nonetheless. I concur with the Forest Service's selection of Alternative Four as the best alternative for the management of the Midewin National Tallgrass Prairie. It seems to support most closely the purposes promulgated by the Illinois Land and Conservation Act of 1995 for the management and use of America's first National Tallgrass Prairie. I also want to commend the Forest Service for their in depth planning efforts and wide solicitation for public input.

There are several important issues regarding the management and use of Midewin that I would like to comment about because I believe they contain the core values expressed in the purposes for the creation of Midewin.

- 1) **Grassland Birds:** Due to its size, location near the Illinois and Kankakee rivers and proximity to other publicly owned lands, Midewin is without reservation the premiere site in Illinois for the management of a number of grassland birds, many of which have shown marked declines over the past decade. Research conducted by INHS and IDNR staff have shown that Midewin is home to the highest concentration of the state listed upland sandpiper in Illinois. Midewin also provides habitat for at least seven area sensitive grassland birds such as the bobolink, grasshopper sparrow, northern harrier, short-eared owl and Henslow's sparrow. Midewin's success will ultimately be defined by the long term viability of this guild of grassland species. The first step to accomplishing this goal is to maintain large undivided grassland tracts, no less than 500 acres. Trails should be sited so large tracts are not subdivided. The larger the tracts the more secure the populations will be. Step two is to provide habitat for nesting, feeding, and brood rearing for this wide range of species. This will require managers be allowed to use grazing, fire, herbicides, and mowing as management tools.
- 2) **Federally and state listed species:** There are at least eleven state listed species known to occur at Midewin. Many are grassland dependent bird species such as the loggerhead shrike, upland sandpiper, northern harrier, short-eared owl, and Henslow's sparrow. A number of state listed plants, animals, and insects also occur here. The only Federally

listed species is the leafy prairie clover. It is very important that these species of special concern be monitored on an annual basis to determine their vitality, reproductive success, and response to management practices such as grazing and burning.

- 3) **Grazing, fire, herbicides and mowing:** It is imperative that these four land management tools be available to managers at Midewin. The Forest Service should not stand down from endorsing and allowing these practices. For example, without grazing it is clear that Midewin stands to lose some species such as the upland sandpiper and loggerhead shrike. Moreover, these management practices are vital in the control and suppression of invasive exotic species, widely used in the various phases of restoring tallgrass prairie and they are the most economical management practices for restoring ecosystem processes on a landscape scale. However, grazing should only be used as a management tool.

- 4) **Exotic species:** I have spent the last year working on a national committee of scientists addressing issues that exotic species are imposing on our wildlands and waters. It is remarkable how quickly these invasive species can alter an ecosystem. This is a national management concern that the Forest Service and its partners at Midewin must make a priority management issue by allowing the use of herbicides and other means to control and contain the spread of exotic species already known from the site and new ones as they appear at Midewin. It is important to move quickly to address some of these issues, particularly the control of autumn olive which may need both mechanical and chemical treatment. The opening up of the site to recreational activities will provide new pathways for seeds to enter (e.g. horses, hiking boots, tires and gear). We would hope that the trails open to horses is limited, and that they not be expanded beyond those in Alternate 4. Immediate response in controlling invasive species is the best way to keep them from dominating the landscape, altering habitats and threatening listed species.

- 5) **Prairie restoration:** One of the prime attractions at Midewin is the promise of restoring the tallgrass prairie on a landscape scale. This is a promise that should be kept in a way to ensure that we do not lose the existing grassland habitats and the diverse grassland bird communities they currently support. It will take a great deal of monitoring to make sound judgements as to how this balance will be made but I am confident that the research and management expertise exists in Illinois to make these critical decisions. This is another example where grazing and fire will play a pivotal role in sustaining the prairie as an ecosystem. Given Midewin's scale, conducting landscape prairie restorations will require incorporating the use of fire, grazing, mowing and herbicides to restore and maintain the structure of the prairie ecosystem and provide for continuous habitats for insects, small mammals, grassland birds, top grazers and keystone predators such as coyotes. Research should specifically be undertaken to determine how prairie restoration can be managed to promote the full range of organisms. We encourage restoration to be approached in a way that will allow researchers to determine the effectiveness of various restoration techniques.

- 6) **Monitoring and research:** It is clear from the history of the establishment of Midewin that the annual monitoring of grassland birds at the former Joliet Arsenal is the pivotal reason why it ultimately became America's first National Tallgrass Prairie. It is imperative to continue monitoring the natural resources at Midewin on an annual basis as restoration begins and recreational activities are allowed to flourish on site. These data will be the best way to highlight and document successful practices put in place so that others can use them at places such as the Badger Ammunition Plant in Wisconsin, Jefferson Proving Grounds in Indiana, and the Savanna Army Depot here in Illinois. And an aggressive monitoring program will also provide an early warning system to reverse practices not producing beneficial results.

There is a real lack of recognition in the Management Plan of the potential role of research on prairie ecosystems made possible by the creation of Midewin. The role of research is not integrated into the mission of Midewin. The Land and Resource Management Plan needs to emphasize the unique and once-in-a-lifetime potential for controlled experimentation in the restoration of tallgrass prairie. A strong research component at Midewin could also be an integral part of Midewin's outreach and educational programs, and could also be linked to recreational opportunities.

Midewin presents a magnificent opportunity for applied research, especially in the areas of community restoration, population dynamics, predator prey relationships, the role of keystone predators, deer herd management and pollination ecology to name a few. The site should make accommodations for research comparisons of various restoration techniques and management strategies. Midewin also provides the rarest of opportunities to monitor and research the effects of introducing recreational activities on a site where there was previously none. This is a truly extraordinary opportunity for biologists, social scientists and outdoor recreational researchers to analyze the impacts of the various recreational pursuits such as hiking, trail riding, camping, etc. over time as they are allowed. This would provide an excellent method and documentation to resolve conflicts between recreational impacts and natural resource protection. The Illinois Natural History Survey is eager to assist the Forest Service in all areas of research and monitoring at Midewin.

- 7) **Access points, internal roads, and trams:** Having some familiarity with the site I think eight public access points seems like too many. It may be wiser to select five of these as public access gates and reserve the other three for public health and safety, law enforcement, and research/monitoring uses. The more public gates the more staff that will have to be dedicated to manning them. It also increases the logistics for law enforcement issues. I support removing all internal paved roads that have no law enforcement, safety or evacuation benefits to the site. Other roads (gravel/dirt) should be as narrow as possible and can serve as fire breaks and access lanes to management units. These roads may have some recreational use but may have to be closed due to weather conditions,

concentrations of nesting, migrating or wintering wildlife, etc.

I fully support the concept of the tramway. It is a superior way to make access available to many people without setting Midewin up for the traffic issues that have afflicted many of our National Parks and Wildlife Refuges. In several cases (e.g. Yosemite and Ding Darling NWR) the mistake was made early in the development of a site by allowing driving early on believing it would not become a problem. But as the areas became more popular traffic, smog and noise pollution became the paramount issue for park and refuge managers. With Midewin sitting among almost 8 million people it would be wise not to make such a predictable mistake here. Trams also offer some of the best wildlife viewing opportunities, especially in open habitats such as prairies.

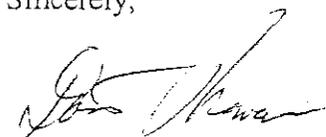
- 8) **Landscapes and vistas:** Another implied promise that Midewin makes is the opportunity for the visitor to be in a prairie on a landscape scale and see the unbroken vista that cannot be seen anywhere else in Illinois. Although these are two intangible Midewin experiences they are at the same time the two most reliable. You may not always see a coyote or a bison on a trip to Midewin but you can always walk to the designated vista points and watch the sun set or the moon rise. This for many people in Northeastern Illinois may be the most memorable experience and one that they return to see again and again. To develop these vistas and maintain them will require the removal of fence rows and hedgerows that have anthropogenic origins. This will not only sustain the vistas and landscape appeal but it will also benefit the grassland birds as well by creating large tracts and decreasing edge effects and nest predation. Here again grazing and burning will play a significant role. These disturbance agents maintain the short grass structure that provides the long views and the feeling of the wide open spaces. This experience would be lost in an area of prairie composed of 8-10 feet tall grass all around.
- 9) **Law enforcement:** A large commitment to law enforcement will be needed to protect all the important resources and outdoor activities that will be available at Midewin. Without a visible law enforcement presence the size and shape of Midewin will make it hard to control and contain illegal access, poaching, wildlife harassment, and vandalism. This is an issue that the Forest Service and its partners need to have well reasoned and planned out before it opens its doors to the public.
- 10) **Wetland restoration:** Shallow wetland restoration is another significant opportunity for Midewin. Shallow wetlands are an increasingly rare community type and Midewin has a few on site now and these have provided habitat for the state listed king rail and yellow rail in the past. Rails as a group are another guild of birds that are facing an extraordinary habitat loss. Midewin, due to its location next to the Illinois and Kankakee rivers, is a prime location for providing both migratory and nesting habitat for these important species.
- 11) **Dolomite prairies:** As the proposal states, the dolomite prairies at Midewin are one of

the rarest prairie types in America and these prairies also provide habitat for the federally listed leafy prairie clover. Every effort should be made to protect these remnants and restore them to their former size and high quality condition.

- 12) **Clean up issues:** Many studies have been done concerning contaminant issues at Midewin. Contaminated sites and potential environmental and human health risks have been identified. The Forest Service needs to continue to work with other federal and state agencies to insure the timely cleanup of sites that could interfere with the restoration of the Midewin Tallgrass Prairie.

I appreciate the chance to provide comments on this document. We have enjoyed our working relationships with Forest Service staff and we share in the vision outlined for Midewin. We also see the unique opportunity at Midewin to conduct the kind of research and monitoring that will help us maintain a productive tallgrass prairie at Midewin and also set a standard nationally for others to follow.

Sincerely,



David L. Thomas, Ph.D.
Chief

DLT:cb

CHICAGO
BOTANIC
GARDEN

M-68

October 8, 2001

Mr. Frank Koenig, Prairie Supervisor
Midewin National Tallgrass Prairie
30071 S. State Route 53
Wilmington, IL 60481

Dear Frank,

Thank you for the opportunity to review the proposed land and resource management plan and draft environmental impact statement for Midewin National Tallgrass Prairie. I am impressed by the amount of planning and thought that has gone into these documents. I support Alternative 4 as the preferred alternative because it does seem to offer a diversity of habitats for native prairie species and grassland birds. It also provides ample facilities for environmental education and recreation.

In the Prairie Plan, I was pleased to see an emphasis on a number of issues that I feel are important, including the management of endangered, threatened, and sensitive species, the control of invasive species, and the need to reduce fragmentation. Reintroduction of rare plant species is one area of particular interest for us at the Chicago Botanic Garden. We would look forward to collaborating with you on experimental reintroductions if you would benefit from our assistance. We feel that both the genetic and ecological issues (*e.g.* Is the provenance of the seed source appropriate? Are the appropriate mutualists including pollinators, mycorrhizae, seed dispersal agents, etc. present?) need to be examined carefully when conducting reintroductions, particularly for rare taxa. In addition population size and connectivity are important issues to consider. The work of Dr. Stuart Wagenius at the Garden has shown that fragmentation and small population size can have significant effects on the genetic structure and demography of purple coneflower, a typical prairie plant. We are also interested in monitoring rare plant taxa (both censuses and demographic studies) particularly in relation to management and the presence of invasive species. Effective monitoring is the key to adaptive management. I was pleased to see a variety of monitoring activities in the plan and they seem appropriate and well thought out.

Invasive species are quickly becoming one of the biggest threats to our native biodiversity and I would encourage you to be diligent about the removal of invasive species and monitoring the effects of management on their abundance. Effective and environmentally friendly control methods are needed for many species. Research on this issue is an important service that Midewin could provide to the conservation community.

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Finally, I fully support your emphasis on environmental education. Providing information to visitors about the importance and value of biodiversity, native species and communities, and the threat of invasive species is extremely important. The more ways we instill a conservation ethic in people, especially children, the better! We look forward to working with you in the future as you implement this impressive plan.

Sincerely,

A handwritten signature in cursive script that reads "Kayri Havens".

Kayri Havens, Ph.D.
Director, Conservation Science