



VILLAGE OF ELWOOD

P.O. BOX 435
ELWOOD, IL 60421
(815) 423-5011

M-52

August 27, 2001

USDA Forest Service, Midewin National Tallgrass Prairie
30071 S. State Route 53
Wilmington, IL 60481

Attn. Mr. Frank Koenig
Prairie Supervisor

RE: Proposed Land and Resource Management Plan

Dear Mr. Koenig:

The Village of Elwood applauds the action taken by the Forest Service to develop a plan that will establish direction for use of the Midewin Tallgrass Prairie for years to come. As our community continues to grow, we take pride in perhaps one day being considered the "gateway to Midewin". We are currently in the process of preparing an open space plan that takes into consideration the many changes occurring in the area. Additionally, we have been meeting with representatives from Openlands Project relevant to the preparation of a "North Midewin Regional Bike Trail Plan". This plan is intended to help area communities identify potential linkages within the region, including connections to Midewin. With these issues in mind, the Village of Elwood submits for your consideration the following comments on the Proposed Land and Resource Management Plan, dated May 2001.

1. The plan notes, and we agree, that Midewin lies within an urbanizing area and the demand for recreation on it is "due to its proximity to Chicago and surrounding suburbs". This demand takes the form of various types of recreation, from nondeveloped, rustic activities such as hiking and site-seeing, to developed recreational opportunities such as biking and camping. We believe that Midewin has the potential to meet the entire spectrum of recreational opportunities without significant adverse effect to its natural resources. The Village of Elwood plans to support Midewin through additional recreational opportunities that compliment the Plan outside its borders, such as the development of trail connections, and camping facilities including equestrian campsites.

RECEIVED

SEP 10 2001

CAET

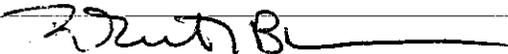
52

2. The plan proposes five miles of bicycle and hiking use trails (pg 2-7). Given over 15,000 acres of area, we feel this is low. We support alternative number 3 of the transportation and trails corridor assessment. Additionally, a bike trail connection in the western half of the project (west of Route 53) would be desirable to provide future links to potential offsite trails. The Village also supports a bike trail paralleling Hoff Road to connect the intended trail head to the Wauponsee Glacial Trail, as was shown in alternative 3.
3. Will bike trails be paved? How will multiple use trails be designed? Bike use and equestrian use are not very compatible on the same trail.
4. The Village supports consideration of some "rural" recreational ROS class and camping on the west side of Route 53.
5. We support the transportation guideline that existing roads and bridges should be considered carefully for trail use and crossing potential before being decommissioned.

In closing, we appreciate your careful consideration of our comments. We believe that alternative number 3 in the draft EIS provides greater overall recreational opportunities and connection opportunities with surrounding communities. We are confident that such an alternative could be implemented to be compatible with primary ecosystem goals.

Again, thank you for the opportunity to comment on this plan. We are excited to have such an opportunity in our "back yard", and look forward to collaborating with you on its successful implementation.

Very truly yours,



Robert Blum, Mayor
Village of Elwood

Village of Elwood Notes
8/28/01

Figure
Midewin National Tallgrass Prairie
Alternative 4
Transportation and Trails Corridors

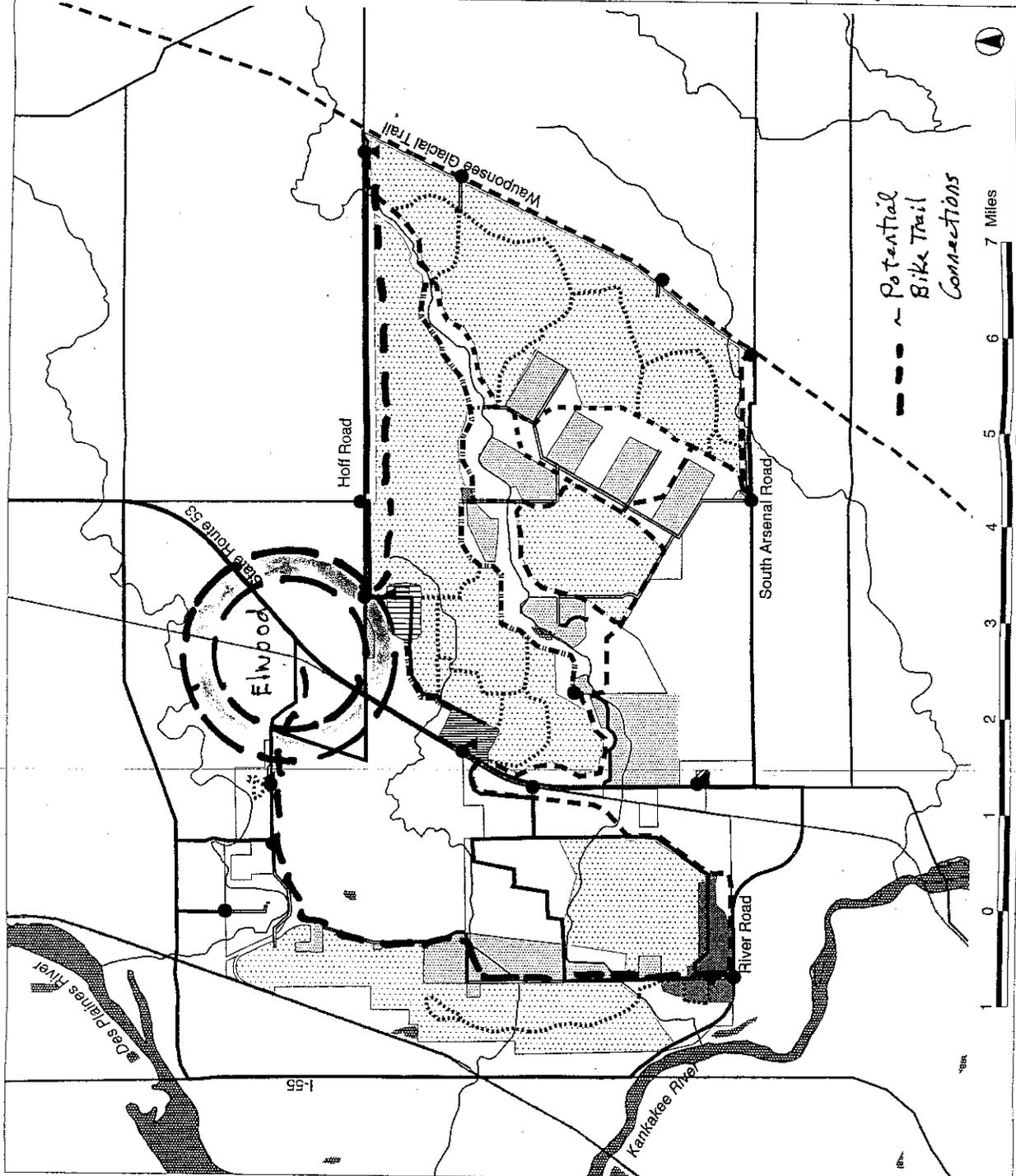
LEGEND

- Hiking Only Trail
- Biking Trail
- Equestrian Trail
- Multi-use Trail
- Unfragmented Area
- Parking
- Public Access
- Administrative Access
- Shuttle Route
- Rail Access
- Auto Access
- Administrative Road
- Other Jurisdiction Road
- Waupoosee Glacial Trail
- Visitor Center / ELC
- Picnic Area
- Campground
- Seed Production Area
- Administrative Site
- Midewin Boundary
- Major Stream
- Open Water
- Cemetery
- Department of the Army

Note: The trail corridors on this map are concepts that reflect the desired condition. They are shown only to represent what a future trail system may look like when fully developed. The actual trail system will be designed, located and developed following Plan direction, standards and guidelines, Forest Service trail handbooks, and further public involvement. Actual trail routes and uses may be different than what is shown on this map.

The Forest Service cannot assure the reliability or suitability of this information for a particular purpose. On the other hand, statements were compiled from various sources. This information may be outdated, corrected, or otherwise modified without notification. For additional information about this data, contact the Midewin National Tallgrass Prairie Planning Team.

Projection UTM Meters, Zone 16, NAD83, Created 03/01, jfm
Midewin National Tallgrass Prairie
30071 South State Route 53
Williamston, Illinois, 60481
815.423.6370
www.fs.fed.us/mntp



52



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

M-61

SEP 05 2001

REPLY TO THE ATTENTION OF
B-19J

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

**Subject: Comments on the Proposed Land and Resource Management Plan and Draft
Environmental Impact Statement for Midewin National Tallgrass Prairie**

Dear Ms. Witt:

The U.S. Environmental Protection Agency Region 5 (U.S. EPA) has reviewed the U.S. Forest Service's (USFS) Draft Environmental Impact Statement (DEIS) for the **Proposed Land and Resource Management Plan for Midewin Tallgrass Prairie in Will County, IL**. Our review is pursuant to the National Environmental Policy Act (NEPA), Council on Environmental Quality (CEQ) regulations (40 CFR Parts 1500-1508), and Section 309 of the Clean Air Act. The CEQ's number for this DEIS is 010151.

The 1995 Illinois Land Conservation Act (ILCA) established the Midewin National Tallgrass Prairie with four basic purposes: to manage land and water resources for conservation and enhancement of native wildlife, fish and plant populations and habitat; to provide opportunities for scientific, environmental, and land use education and research; to allow continuation of agricultural land use for resource management purposes; and, to provide for a variety of recreation opportunities that are compatible with the other purposes. This legislation directed the USFS to develop a Land and Resource Management Plan in consultation with the Illinois Department of Natural Resources, local governments, and the public. Alternatives for the DEIS were developed in response to several significant issues, development of appropriate types and quantities of sensitive species habitat, amounts and types of restoration and reintroduction activities, and provision of educational and safe recreational opportunities. Alternative 4 in the DEIS, the Preferred Alternative, offers a balance of restoration of habitat types for sensitive grassland birds and restoration of native prairie. This alternative offers moderate recreational development, with a mix of opportunities compatible with restoration; a visitor center, campground, and mix of trail lengths and trail types. The No Action Alternative would continue existing conditions with no long term management plan.

RECEIVED

SEP 10 2001

CAET

61

Having reviewed the DEIS, U.S. EPA rates the document **EC-2, Environmental Concerns, Insufficient Information**. An Environmental Concerns rating indicates that our review has identified environmental impacts that should be avoided to fully protect the environment. Our concerns, which we believe are shared by the USFS, include water quality, existing wetland functions, invasive species, and nontarget impacts of agricultural practices. Providing additional information on agricultural practices that would be allowed at Midewin, and on existing wetland values to Midewin's existing species contingent would assist both the public, other agencies, and the decision maker in understanding Midewin's present and planned future. Please see our detailed comments (enclosed).

We appreciate the opportunity to review the DEIS. Detailed comments are attached. Please send only two copies of the final EIS (FEIS) to this office at the same time they are officially filed with our Washington, D.C. Office. If you have any questions, please call Rosalyn Johnson of my staff at (312) 353-5692, or send email to johnson.rosalyn@epa.gov.

Sincerely,



Kenneth A. Westlake
Chief, Environmental Planning and Evaluation Branch
Office of Strategic Environmental Analysis

Enclosure (1): Detailed Comments

Comments on the Proposed Land and Resource Management Plan and the Draft Environmental Impact Statement for Midewin National Tallgrass Prairie, Will County, IL

September 5, 2001

DETAILED COMMENTS

Water Quality Standards: Total Maximum Daily Loads (TMDLs)

U.S. EPA's role is to review and approve TMDLs once they are submitted by the State of Illinois. A TMDL is the amount of a pollutant that a waterbody can receive and still meet water quality standards. TMDLs are used to identify and quantify sources of water quality impairment and assign load allocations for each source at a level necessary to protect beneficial uses such as fishing and swimming. For your information, impaired waters in the immediate vicinity of Midewin have been identified by the State of Illinois are listed in Table 1 (below). To view maps and find the names of all the impaired waters in the Midewin vicinity, please consult <http://www.epa.gov/waters/tmdl>.

Table 1. Impaired Waters in the Vicinity of Midewin National Tallgrass Prairie

Name	Watershed Name	Water Quality Impairments*
Des Plaines River	Des Plaines	Priority Organics Ammonia Nutrients Metals Pathogens Siltation Other Habitat Alterations Suspended Solids Organic Enrichment/Low Dissolved Oxygen Salinity/tds/chlorides Oil and Grease

*Some of these pollutants may have been identified in stretches of the Des Plaines River that are distant from Midewin.

The waters of the Des Plaines River run less than a mile away from the northwest corner of Midewin. Table 1 indicates that river water quality is impaired by sediment, organics, pathogens, and a host of other pollutants. Of these pollutants, future prairie restoration and management, and continuing agricultural practices could contribute sediments, organic enrichment, pathogens, etc. We recommend that the USFS, as a stakeholder in the Des Plaines watershed, follow restoration practices (e.g., timing of prescribed burns, soil preparation) that minimize adverse impacts to water quality in the rivers and tributaries in the vicinity of Midewin. Also, agricultural leases on Midewin lands should be restricted or designed in such a way as to eliminate pesticide, herbicide, and fertilizer runoff to local waters. We are confident that in order to achieve long-term net improvements in water quality, the USFS will ensure protection of water quality through adequate buffer zones, best management practices, and enforcement of agricultural and recreational use rules at Midewin.

Comments on the Proposed Land and Resource Management Plan and the Draft Environmental Impact Statement for Midewin National Tallgrass Prairie, Will County, IL
September 5, 2001

Management of Midewin is important to the overall health of the Des Plaines watershed and the attainment of water quality standards set by the State of Illinois. In the future, especially with the completion of Army remediation in the area, the Midewin area may provide an opportunity for establishing a "reference" area in the watershed against which other areas with varying degrees of disturbance can be compared. USFS lands can provide consistent, long-term protection from impairments of local waters that are dominated by residential and commercial uses, agriculture, and industrial use.

Wetland Delineation and Restoration

Having noted that DEIS is more programmatic than project specific, U.S. EPA recommends that wetland delineations be conducted prior to wetland restoration efforts, trail and road building. Also, although restoration efforts are likely to show net benefits to wetland functions and values, we recommend that in future NEPA analyses the USFS discuss the lost functions from existing wetlands, whether those losses would be significant to any endemic or remnant plant or animal populations, and how mitigation or compensation for those losses will be addressed in the wetland restoration process.

The USFS should consult with the U.S. Army Corps of Engineers regarding wetland delineations, and possible permitting needs associated with wetland restoration activities. Under CWA Section 404(f)(1)(A), normal farming and ranching practices (e.g., plowing seeding, cultivating, minor drainage, and harvesting for food) are not prohibited or otherwise subject to regulation. Also, construction and maintenance of farm roads is exempted under CWA Section 404(f)(1)(E), but only in cases in which "such roads are constructed and maintained in accordance with best management practices, to assure that flow and circulation patterns and chemical and biological characteristics of navigable waters are not impaired, that the reach of navigable waters is not reduced, and that any adverse effect on the aquatic environment will be otherwise minimized." CWA Section 404 exemptions do not apply if the discharge contains any toxic pollutant listed under CWA Section 307.

Air Quality

Midewin lies within the ozone non-attainment zone for the Chicago area; it is important that prescribed burns are timed and implemented in a way that would not contribute to ozone emissions. We support the USFS Plan Standards and Guidelines that recommend:

- ◆ preparing a smoke management plan prior to prescribed burns;
- ◆ compliance with the Clean Air Act and other applicable federal, state, and local air quality regulations; and,

Comments on the Proposed Land and Resource Management Plan and the Draft Environmental Impact Statement for Midewin National Tallgrass Prairie, Will County, IL
September 5, 2001

- ♦ preventing implementation of burns during ozone or other air quality alerts or during periods when particulate matter levels are near or above National Ambient Air Quality Standards.

Invasive Species

We support the USFS plan to continue to emphasize native plant species and communities through use of local, native seed stock in restoration activities and by preventing new or additional infestations of exotic plant species. U.S. EPA supports the USFS policy to actively remove invasive non-native plant species that threaten native communities through manual and mechanical removal and possible use of herbicides. The USFS should also begin to focus at the appropriate level on impacts of non-native fauna (e.g., Norway rats, domestic cats) on native populations while developing future management practices at Midewin. These actions are in keeping with Executive Order 13112 on Invasive Species.

Interim Agricultural Use

The DEIS states that agricultural use of Midewin lands will be phased out as restoration activities progress. In planning for the interim period, we recommend that the USFS develop Plan Standards and Guidelines that restrict, as appropriate, farming and ranching practices that could result in the spread of noxious weeds, use of genetically modified crops that impact native species under certain conditions (e.g., Bt corn pollen impacts on Monarchs and other local lepidoptera), and use of pesticides and fertilizers that may have direct and indirect nontarget impacts on aquatic and terrestrial species.

Socioeconomic Issues

In addition to information collected from multiple sources in the socioeconomic section of the DEIS, the USFS may also want to focus on surveys of visitors to Midewin as public visitation grows. We believe that such surveys would assist in characterizing the social context of the Land and Resource Management Plan. We realize that funding may be limited for this type of activity, but using resources for this purpose is likely to have long-term benefits to Midewin.

Appropriate interview and survey questions might address the following: Where do users come from and how far do they travel to get to the prairie? What are the level of auto use to get to the area? What is the level of each user activity (e.g., horseback riding, cycling, hiking, hunting, fishing, motorized vehicles, and sustainable extraction of fruits or plants) and how would the USFS characterize activity impacts on the watersheds, ecology, and sensitive species on the site? Are there cultural affiliations that drive different uses? Where and when does the heaviest use occur for each activity? How will users actually dispose of human waste and other

Comments on the Proposed Land and Resource Management Plan and the Draft Environmental Impact Statement for Midewin National Tallgrass Prairie, Will County, IL
September 5, 2001

refuse? What is the level of user awareness regarding rules for use? What media outlets do users rely on, so that user outreach, management plan outreach, and NEPA process outreach may reach a broad segment of the population? What percentage of users have access to the world wide web and are aware of the USFS resources there? What other avenues of communication are favored (e.g., email lists, church newsletters, local libraries, schools)?

Hazardous Materials

Water Supply Wells

We concur with the Illinois Environmental Protection Agency's (IEPA) comments of August 28, 2001. The Superfund Record of Decision (ROD) for the Joliet Army Ammunition Plant, which also applies to Midewin, requires that groundwater above the Maquoketa shale not be used for potable water supply. Any new water supply wells should not be drilled within or near Groundwater Management Zones, which are delineated in the October 1998 Superfund ROD.

Unexploded Ordinance

We also concur with IEPA's comments on eliminating the risk of unexploded ordinance (UXO) before allowing public access to areas known or expected to contain UXO.

Climate Change

We recommend that the USFS consider climate change in the planning process by tracking the abundance and distribution of species, to the extent possible through monitoring, over the life of the management plan. Potential shifts to consider due to climate change include: habitat changes that would take place faster than fish and wildlife may be able to adapt, and variation in water temperature that could affect fish populations in critical ways (i.e., depletion or elimination of fish stocks). Climate change (mean temperature and precipitation changes over time and associated increases in atmospheric carbon dioxide) and vegetative community changes over the planning period could be significant for Midewin.