

Comments Received During the Public Hearing Period for the 2020 Review and Revision of the Illinois List of Endangered and Threatened Species and Responses from the Board

No comments were made during the public hearing in Springfield on October 11, 2019. Four written comments were subsequently received. The Board reviewed the comments at the 184th meeting on November 15, 2019 and responses to each comment were sent.

Comment

Lincoln Park Zoo supports the Endangered Species Protection Board proposed list changes.

Marybeth Johnson



Marybeth Johnson

Vice President, Government Relations and External Affairs

Pronouns: She/Her/Hers

Lincoln Park Zoo
2001 N. Clark Street
Chicago, IL 60614
312-742-7232
www.lpzoo.org

Response

Dear Ms. Johnson,

Thank you for submitting a comment on behalf of the Lincoln Park Zoo to the Illinois Endangered Species Protection Board as part of the public hearing process for the proposed revision of the Illinois List of Endangered and Threatened Species. The Board greatly appreciates your organization's input and support.

At its November 15 meeting the Board gave final approval to the listing decisions included in the summary that was posted on its website. The changes will be submitted to the Illinois legislature as two Administrative Rules - the Illinois List of Endangered and Threatened Fauna and the Illinois List of Endangered and Threatened Flora. Changes would not be effective for a

few months. A complete listing of endangered and threatened species will then be posted on the Board's website. Thank you again.

Dr. Joyce Hofmann
Chair, Illinois Endangered Species Protection Board

Comment

Attended the hearing yesterday out of curiosity. Afterward, I thought of something that should be said more often and warrants being part of the public record.

Thanks to the Board for all of its hard work, particularly in the absence of an Executive Director.

Implementing a new review process was probably challenging at times, but served its goal of improving scientific objectivity and transparency of the Board's decisions.

Sincerely,

Robert D. Bluett
Athens, IL 62613

Response

Dear Bob,

Thank you for submitting a comment to the Illinois Endangered Species Protection Board following the public hearing on the proposed revision of the Illinois List of Endangered and Threatened Species. The Board appreciates your interest and support.

At its November 15 meeting the Board gave final approval to the listing decisions on the summary that was posted on our website. The changes will be submitted to the Illinois legislature as two Administrative Rules - the Illinois List of Endangered and Threatened Fauna and the Illinois List of Endangered and Threatened Flora. As you know, changes would not be effective for a few months. A complete listing of endangered and threatened species will then be posted on the Board's website.

Thank you again for all your assistance to the Board.

Joyce
Dr. Joyce Hofmann
Chair, Illinois Endangered Species Protection Board

Comment

I realize things are probably already decided and I really wanted to limit my involvement in the Plant ESTAC but I do want to say that I am disappointed to hear that the plant names have not been changed to reflect those used in the national USDA plant database. To my knowledge no state outside of Illinois uses Mohlenbrock's nomenclature as those names are not online and not nationally accepted. It's also my understanding that at least 2 different conflicting sources were used in the names for the current proposed list. I didn't go into the details and check all of the plant listings but I was anticipating Melanthium being changed to Veratrum and I believe there are no changes for Aster furcatus, even though nearly all other states and sources are using Eurybia furcata. None of us like change but in my reviews for INPC documents I insist upon the use of single source nomenclature.

I spoke to John Wilker, who is our IDNR representative on the ESTAC, and he informed me there was lots of discussion on this. I just wanted to state my disagreement with the decision.

Perhaps this can be rectified in the next round in 5 years.

Thanks.
Angella

Response

Dear Angella,

Thank you for submitting a comment to the Illinois Endangered Species Protection Board concerning the proposed revision of the Illinois List of Endangered and Threatened Species. Board members discussed your concern about the use of scientific names for plants from sources other than the USDA plant database at our November 15 meeting. I understand that this issue had also been discussed by the Plant Endangered Species Technical Advisory Committee, although no decision was made to use names from a specific source other than Mohlenbrock. Board members agreed that it would be good practice to incorporate a single, uniform source for plant names in future revisions of the Illinois List of Endangered and Threatened Flora. The Board would appreciate your collaboration on an update of the nomenclature of listed plants for the next revision, as you discussed with Janice Coons..

At its November 15 meeting the Board gave final approval to the listing decisions on the summary that was posted on its website. The changes will be submitted to the Illinois legislature as two Administrative Rules - the Illinois List of Endangered and Threatened Fauna and the

Illinois List of Endangered and Threatened Flora. As you know, changes would not be effective for a few months. A complete listing of endangered and threatened species will then be posted on the Board's website.

Thank you again for your efforts on behalf of endangered and threatened species in Illinois and your assistance to the Board. Joyce

Dr. Joyce Hofmann
Chair, Illinois Endangered Species Protection Board



October 24, 2019

Illinois Endangered Species Protection Board
One Natural Resources Way
Springfield, Illinois 62702-1271
DNR.espb@illinois.gov

Re: Public Comment Regarding the Proposed Revision of the Illinois List of Endangered and Threatened Species

To Whom It May Concern:

Please accept these comments from Illinois Farm Bureau (IFB) with regard to the changes the Illinois Endangered Species Protection Board (Board) is considering to the Illinois List of Endangered and Threatened Species (List), as articulated at the October 11, 2019, public hearing.

Founded in 1916, IFB is a non-profit, membership organization directed by farmers who join through their county Farm Bureau. IFB has a voting membership of more than 80,000. IFB represents three out of four Illinois farmers. IFB policy is formed through a grassroots policy development process, which takes into account the opinions of our many members.

In preparation for attending the October 11, 2019, public hearing, as well as in preparation for writing this comment, IFB reviewed the current version of the List and additional resources available on the Board's website (<https://www.dnr.illinois.gov/ESPB/Pages/default.aspx>) including past Board meeting minutes and agendas, as well as the current list of proposed changes (https://www.dnr.illinois.gov/ESPB/Documents/92019_Final_Summary_%20of_ESPB_preliminary_approvals_.pdf). In addition, IFB attempted to attend as many of the Board meetings over the past several years as schedules allowed.

First, IFB has a great respect for the mission of the Board, which "is to protect those species of plants and animals native to Illinois which are in danger of being lost from the wild in Illinois." IFB policy further supports "scientific and peer-reviewed data being used as the basis for listing a species, as well as the basis for the development of regional or state conservation plans involving those species." Further, IFB policy supports "a legitimate state-level process of involving stakeholder, including farm organizations, the Illinois Department of Agriculture, and agricultural representatives, in discussions around listing decisions and conservation planning."

Although IFB appreciates the fact that the Board allows the public an opportunity, pursuant to the Open Meetings Act, to attend its meetings and review its minutes, the complexity of endangered species issues in Illinois - both from a work load standpoint as the proposed list contains 15 pages of species and proposed action, and from a scientific standpoint - warrants an additional level of awareness being afforded to the agricultural community. As Illinois farmers own and farm land on which these species may be present, it is important that they be afforded the opportunity to "come along for the ride" with other citizens in the state of Illinois - including naturalists, zoologists, ecologists and a botanist - as these serious issues are discussed. Not only would an increased level of participation on the Board allow the agricultural community more awareness of various species in peril, it would also allow for the agricultural community to help the Board and its scientific collaborators in their efforts to protect species. As such, on June 24, 2019, IFB nominated Keith Mussman to serve on the Board. Mr. Mussman is a farmer in Kankakee County with a familiarity of federal and state goals of species conservation. His addition to the Board would add immense value and perspective. We look forward to a response to that nomination letter.

Additionally, in preparing for both the attendance at the October 11, 2019, public hearing and this written comment, IFB noticed that several of the minutes of earlier Board meetings had not yet been posted for the public to view. Specifically, the minutes of the May 17, 2019 Board meeting were not posted until after the public hearing date. In that meeting, among other work, three species were added to the list as threatened, two species were added to the list as endangered, and six species were changed on the list from threatened to endangered. Further, as of the date of filing this written comment with the Board, the August 16, 2019 meeting minutes were still not posted. In that meeting, among other work, two species were added to the list as endangered, one was added to the list as threatened, and two were changed from threatened to endangered.

The exercise in connecting the limited substance provided in the 15-page proposed list to the minutes on the Board's website is incredibly challenging. It could help the public understand how the Board arrives at the recommended List if the Board would add substantive discussion on its proposed list for each species, rather than forcing the public to do the work on its own. In addition, even when the exercise is completed and the discussion in the minutes is connected to the proposed list, the content provided as to the petition and scientific support for listing details of each species is far too limited. It would be beneficial for the public to grow in its understanding of both the Board's process and the science behind their decisions if the Board added more justification to the proposed list.

Finally, it makes it impossible for the public to understand the details and provide meaningful public comment when the minutes are never posted prior to the public comment deadline. In fact, IFB waited until a day ahead of the deadline for public comment to ensure we had access to all publicly available information.

We appreciate the opportunity to provide this feedback and public comment to the Board as it works to update the List.

Sincerely,

A handwritten signature in black ink that reads "Lauren Lurkins". The signature is written in a cursive, flowing style.

Lauren Lurkins
Director of Environmental Policy
Illinois Farm Bureau®
1701 Towanda Avenue
Bloomington, IL 61701-2050



ILLINOIS ENDANGERED SPECIES PROTECTION BOARD

One Natural Resources Way, Springfield, Illinois 62702 - 1271; dnr.espb@illinois.gov

Lauren C. Lurkins
Director of Natural and Environmental Resources
Governmental Affairs and Commodities Division
Illinois Farm Bureau
1701 N. Towanda Avenue
Bloomington, Illinois 61701-2050

Dear Lauren,

Thank you for submitting comments to the Illinois Endangered Species Protection Board regarding the Board's current five-year revision of the Illinois List of Endangered and Threatened Species. Members of the Board were very appreciative of your thoughtful and constructive comments. We applaud the Illinois Farm Bureau's commitment to attending meetings, raising questions, and making suggestions to improve the process of protecting our state's endangered and threatened species.

Over the coming months, the Board will be discussing our processes, including how we communicate actions and decisions to the public and stakeholders such as the Farm Bureau. It is important that the public clearly understands how decisions are made and that they have easy access to information that explains those decisions. Thank you for bringing those points to our attention.

Personnel at the Illinois Department of Natural Resources have been assisting the Board by updating its website in a timely manner. Because the Board meets only quarterly there is always a three-month interval before minutes can be approved and posted. It was unfortunate, however, that there was a problem with the posting of the minutes for the Board's May 2019 meeting. All past agendas and meeting minutes are now posted, except for minutes of the November 2019 meeting, which must be approved by the Board at its February 21 meeting.

During the public hearing period the Board received no comments on specific changes in listing status that had been proposed. At the November 2019 meeting Board members gave final approval to those proposed changes. Updated versions of the Administrative Rules containing the List of Endangered and Threatened Illinois Fauna and the List of Endangered and Threatened Illinois Flora are currently undergoing legal review. It may be several months before any changes are finalized.

Thank you again for your participation and feedback.

Sincerely,

Dr. Joyce Hofmann
Chair, Illinois Endangered Species Protection Board