



## 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, 2017

Ms. Gabrielle Mattingly, Assistant Planner  
City of Naperville  
400 S. Eagle Street  
Naperville IL 60540

**RE: Central States Tower LLC IL-00-5717, Naperville, DuPage County  
Endangered Species Consultation Process  
EcoCAT Review #1803290**

Dear Ms. Mattingly:

This letter addresses consultation with the City of Naperville on this proposed action, pursuant to the requirements of the *Illinois Endangered Species Protection Act* [520 ILCS 10/11], the *Illinois Natural Areas Preservation Act* [525 ILCS 30/17], and Title 17 *Illinois Administrative Code* Part 1075. Additionally, the Department may offer advice and recommendations for species covered under the *Fish & Aquatic Life Code* [515 ILCS 5, *et seq.*]; the *Illinois Wildlife Code* [520 ILCS 5, *et seq.*]; and the *Herptiles-Herps Act* [510 ILCS 69].

The proposed action is authorizing the siting of a 130-foot-high communications tower on the grounds of the Naperville Park District Springbrook Golf Course near the southwest corner of Book Road and 83<sup>rd</sup> Street.

This location is within 300 feet of the **Springbrook Prairie Illinois Natural Areas Inventory (INAI) Site**, owned by the Forest Preserve District of DuPage County, much of which is dedicated as the **Springbrook Prairie Nature Preserve** or registered as the **Springbrook Marsh Land & Water Reserve**, both elements of the Illinois Nature Preserves System administered by the Illinois Nature Preserves Commission.

The INAI Site is noted as an Important Bird Area, providing essential habitat for a number of State-listed endangered or threatened avian species, including the endangered **Northern Harrier**, *Circus cyaneus*; **Short-eared Owl**, *Asio flammeus*; **Upland Sandpiper**, *Bartramia longicauda*; **Black-Crowned Night Heron**, *Nycticorax nycticorax*; and **Black Rail**, *Laterallus jamaicensis*; as well as the formerly-listed **Henslow's Sparrow**, *Ammodramus henslowii*. In recent years, Spring Brook has provided essential habitat for the State-listed threatened fish, the

**Iowa Darter**, *Etheostoma exile*. The Golf Course itself has supported the State-listed endangered **Barn Owl**, *Tyto alba*, and in years past the State-listed endangered **Loggerhead Shrike**, *Lanius ludovicianus*. Most of these birds are grassland-dependent species, while the remainder prefer marshes. The Department notes that these are listed species with breeding records in the vicinity, but Springbrook Prairie is also important to many more species of migratory birds which rest or feed there during migration.

Concerns have been expressed about the potential of a communications tower in this location to result in the mortality of migratory birds, including the endangered and threatened species.

The term “communications tower” covers a broad range of installations, including VHF/UHF television and radio antennas. The latter are usually very high, exceeding 1,000 feet, and are structurally supported by a system of guy wires. Past research has demonstrated that such towers which exceed 600 feet in height are very deadly to night-flying migratory birds, because such towers must be lit with aviation warning lights which disorient birds, and because of their web of supporting cables. It is collision with the cables which is responsible for most of the avian deaths.

This tower will not be lit, will lack guy wires, and—at 130 feet—will not rise to a height dangerous to night-flying migratory birds, which typically cruise at much higher elevations. Migratory birds staging at Springbrook Prairie will approach at dawn or depart at twilight, when the tower will still be visible. Most of the listed species which breed at Springbrook Prairie are active in daylight, when the tower will be clearly visible, while the nocturnal species, such as the owls, will also easily avoid it, since in highly-developed urban areas it is never truly dark. While the tower’s shadow will sometimes fall within the bounds of the Nature Preserve, because of the proximity of existing trails and roads, those areas likely to experience shadow are unlikely to support ground-nesting avian species.

The Barn Owl nesting record occurred in the Springbrook Golf Course maintenance/machinery shed, which is directly adjacent the proposed tower site. However, if this species is still using this site (it has only a three-year life span), it is well-acclimated to human activities, and tower construction would be unlikely to harass Barn Owls nesting there.

Consequently, the Department believes this tower, in this location, is unlikely to adversely modify the essential habitat of State-listed species, and is unlikely to result in the prohibited incidental taking of State-listed endangered or threatened species. The tower’s construction will not directly adversely modify the Springbrook Prairie Nature Preserve, and the daily progress of the tower’s shadow will be insufficient to be detrimental to plants or to alter the diversity of plant life within the shadow’s arc. The Springbrook Prairie Land & Water Reserve is too distant to be affected in any way.

Consultation on the part of the Department is closed, unless the City of Naperville desires additional information or advice related to this proposal. This consultation is valid for two years

unless new information becomes available which was not previously considered. If the action has not been implemented within two years of the date of this letter, or any of the above listed conditions develop, a new consultation is necessary.

The natural resource review reflects the information existing in the Illinois Natural Heritage Database at the time of this letter, and should not be regarded as a final statement on the project being considered, nor should it be a substitute for detailed site surveys or field surveys required for environmental assessments. If additional protected resources are unexpectedly encountered during the project's implementation, the applicant must comply with the applicable statutes and regulations. Also, note that closure of consultation does not imply IDNR's authorization or endorsement of the proposed action.

Please do not hesitate to contact me should any questions arise regarding the Department's review of this proposed action.

Sincerely,

A handwritten signature in black ink that reads "Keith M. Shank". The signature is written in a cursive style with a large initial "K" and "S".

Keith M. Shank, Chief  
Impact Assessment Section  
Office of Realty and Environmental Planning  
Department of Natural Resources  
(217)785-4984  
[keith.shank@illinois.gov](mailto:keith.shank@illinois.gov)

cc: Devon Pavlik, EBI Consulting

*Applicant:* EBI Consulting on behalf of Central States Tower  
*Contact:* Devon Pavlek  
*Address:* 2956 Langston Cir  
St. Charles, IL 60175

*IDNR Project Number:* 1803290  
*Date:* 10/20/2017  
*Alternate Number:* 6116004848,  
1711324

*Project:* Naperville Springbrook / IL-00-5717  
*Address:* 2220 W 83RD STREET, Naperville

*Description:* Central States Tower III, LLC proposes to construct a tower facility on the northeastern portion of the Subject Property. The proposed facility will consist of a 130-foot monopole tower (135 feet, including the top-mounted lightning rod) within a 60-foot by 60-foot lease area. Utilities will follow a proposed access/utility easement commencing from 83rd Street.

### Natural Resource Review Results

#### Consultation for Endangered Species Protection and Natural Areas Preservation (Part 1075)

The Illinois Natural Heritage Database shows the following protected resources may be in the vicinity of the project location:

- Springbrook Prairie INAI Site
- Springbrook Marsh Land And Water Reserve
- Springbrook Prairie Nature Preserve
- Barn Owl (*Tyto alba*)
- Black Rail (*Laterallus jamaicensis*)
- Black-Crowned Night Heron (*Nycticorax nycticorax*)
- Iowa Darter (*Etheostoma exile*)
- Northern Harrier (*Circus cyaneus*)
- Short-Eared Owl (*Asio flammeus*)
- Upland Sandpiper (*Bartramia longicauda*)

**An IDNR staff member will evaluate this information and contact you to request additional information or to terminate consultation if adverse effects are unlikely.**

#### Location

The applicant is responsible for the accuracy of the location submitted for the project.



*County:* DuPage

*Township, Range, Section:*  
38N, 9E, 34

**IL Department of Natural Resources  
Contact**  
Keith Shank  
217-785-5500  
Division of Ecosystems & Environment

**Government Jurisdiction**  
City of Naperville  
Gabrielle Mattingly  
400 S Eagle St  
Naperville, Illinois 60540

## **Disclaimer**

The Illinois Natural Heritage Database cannot provide a conclusive statement on the presence, absence, or condition of natural resources in Illinois. This review reflects the information existing in the Database at the time of this inquiry, and should not be regarded as a final statement on the site being considered, nor should it be a substitute for detailed site surveys or field surveys required for environmental assessments. If additional protected resources are encountered during the project's implementation, compliance with applicable statutes and regulations is required.

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