

# News Release

## Bell Bowl Prairie

**For Immediate Release: January 21, 2022**

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### **NLI's Response in Opposition to the Greater Rockford Airport Authority's Rule 12(b)(1) Motion to Dismiss for Lack of Standing.**

**Rockford, IL -- Natural Land Institute (NLI)** filed a response on January 19, 2022 in opposition to Greater Rockford Airport Authority's Rule 12(b)(1) Motion to Dismiss for Lack of Standing as it relates to Bell Bowl Prairie and the airport's assertion that NLI has no standing.

NLI strongly asserts that it has "standing to sue in its own right based on its institutional interests" and is suing on behalf of its members. NLI's lawsuit states, "NLI has standing to sue the GRAA and the other defendants under its federal NEPA and APA claims as well as the Illinois Endangered Species Act due to violations of those statutes and their implementing regulations. NLI also has standing to sue the GRAA under its contract claim. The GRAA is in breach of the written agreement (the "Agreement"), as described *surpa*, it has had with NLI since 1977, by which NLI and its members have spent their own labor and resources to manage and preserve BBP on behalf of the GRAA and the public, and by which NLI and its members fulfilled its foundational mission to preserve rare Illinois prairie, like BBP."

The number for this filing is Case: 3:21-cv-50410 Document #28. Several NLI members provided supporting declarations and exhibits for this filing. Documents for NLI's response in opposition to the GRAA's Motion to Dismiss can be found in the resources section of [www.SaveBellBowlPrairie.org](http://www.SaveBellBowlPrairie.org).

NLI filed the original lawsuit on Oct. 26, 2021, Case: 3:21-cv-50410 Document #:1. This was "an action seeking declaratory and injunctive relief, prohibiting any and all activities that would adversely affect the environmental resources associated with Bell Bowl Prairie in Winnebago County, Illinois" because the proposed roadwork and expansion for the Midfield

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Cargo Development at the airport would permanently destroy the Bell Bowl Prairie, a rare ancient dry gravel prairie.

These cases were filed in the United States District Court for the Northern District of Illinois Western Division.

**About the Natural Land Institute**

The Natural Land Institute, an accredited land trust, is a 501(c)3, not-for-profit conservation organization based in Rockford, Illinois and has protected 18,000 acres of natural land in Illinois since 1958. Their current service area covers twelve counties in northern Illinois. NLI's mission is to create an enduring legacy of natural land in northern Illinois for people, plants and animals. For more information and to donate: [www.NaturalLand.org](http://www.NaturalLand.org).

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