

Appendix J

Finding of No Practicable Alternative

**DEPARTMENT OF THE ARMY
FINDING OF NO PRACTICABLE ALTERNATIVE FOR
DISPOSAL AND REUSE OF LRA PARCEL 20 AT
SAVANNA ARMY DEPOT ACTIVITY, ILLINOIS**

1.0 Introduction

The Department of the Army (Army) prepared a Draft Environmental Impact Statement (DEIS) for disposal and reuse of a 132-acre land parcel at the Savanna Army Depot Activity (SVADA), IL (Figure 1). SVADA is in Carroll and Jo Daviess counties, IL, along the Mississippi River. LRA Parcel 20 is in Carroll County at the southeastern end of SVADA. The DEIS evaluates potential environmental and socioeconomic effects associated with the proposed disposal and reuse of the parcel. The Army would dispose of the land parcel, known as LRA Parcel 20, by transferring it to the Jo-Carroll Depot Local Redevelopment Authority (LRA) or other recipient(s) for their reuse (Figure 2).

The DEIS analyzes five alternatives, one of which is the LRA Reuse Alternative, as documented in the DEIS. Under the LRA Reuse Alternative, the LRA would implement their proposed 2023 LRA Reuse Plan to develop the parcel and adjacent land into a port (Figures 3, 4, and 5). The LRA's proposed development would occur on LRA Parcel 20 and extend outside the boundary of the parcel into the Apple River, into the Mississippi River's Brickhouse Slough and main channel, and along Apple River Island in the Mississippi River. It would require dredging in Commander's Pond and in the Mississippi River's Brickhouse Slough and main channel.

The Army has determined that elements of the LRA Reuse Alternative, specifically the proposed development of port facilities in Commander's Pond and the Brickhouse Slough, and dredging in Commander's Pond, Brickhouse Slough, and Mississippi River main channel, would occur within areas of 100-year floodplains and wetlands (Figure 6). If the LRA implements their proposed reuse alternative, it would be built within the floodplain and wetlands because the port would have to be on the water and there would be no practicable alternative.

The Army published a notice in The Savanna Times-Journal on December 11, 2025, describing why the LRA would have no alternative to locating certain facilities within floodplains and wetlands and announcing the availability of the DEIS for public review and comment for 45 days.

2.0 LRA Reuse Alternative

For the LRA Reuse Alternative, the Army would transfer the parcel to the LRA and the LRA would implement *their 2023 LRA Reuse Plan to develop the parcel and adjacent land into a port with docks, wharves, conveyor systems, and roads plus recreational facilities and potentially solar development. The LRA's proposed development would occur on LRA Parcel 20 in Commander's Pond and extend outside the boundary of the parcel into the Apple River, Brickhouse Slough, and along Apple River Island in the Mississippi River. To facilitate implementation, the LRA designed the reuse alternative in three sequential phases. Phase 1 would be implemented* within a 5-year target completion window, while

Phases 2 and 3 would follow, each having a 5-year-plus completion window. All three phases of the LRA Reuse Alternative would require dredging: 1,273,899 cubic yards (yd³) in Brickhouse Slough under Phase 1; 524,533 yd³ in Commander's Pond under Phase 2; and another 313,689 yd³ in Commander's Pond under Phase 3.

- Phase 1 prioritizes development of a barge fleeting area along Apple River Island with dredging in Brickhouse Slough, a dry bulk and liquid bulk wharf on Brickhouse Slough with a road connecting it to the Savanna Industrial Park, and recreational and solar uses on LRA Parcel 20. The dredging in Brickhouse Slough would include a "long reach" in the slough that extends north from Commander's Pond to a partial turning basin at the northern end of Apple River Island and a "short reach" in the slough that extends south from Commander's Pond. The long and short reaches would provide access to the Mississippi River main navigation channel.
- Phase 2 adds dredging in Commander's Pond to accommodate an L-shaped lift-on/lift-off (LOLO) wharf on Commander's Pond to support the expansion of specialty and break-bulk cargos and dry-dock capacity, and travel lift piers would provide accessibility to the larger landside dry-dock area.
- Phase 3 would include additional dredging in Commander's Pond to accommodate another LOLO wharf to increase wharf handling capacity and a repair fleeting area as well as an aquatic habitat restoration area.

3.0 Impacts and Mitigation Measures

3.1 Floodplains

According to Federal Emergency Management Agency (FEMA) Flood Insurance Rate Map panel 17015C0050C for Carroll County, IL, effective December 17, 2010, the entire LRA Parcel 20 is in a 100-year floodplain. A small area in the southwestern portion of the parcel also is designated as a regulatory floodway, defined by FEMA as the channel of a river or other watercourse and the adjacent land areas that must be reserved to discharge the base flood without cumulatively increasing the water surface elevation more than a designated height. Development in a regulatory floodway is regulated to ensure there are no increases in upstream flood elevations.

Structural pilings would alter water flow and sediment dynamics in the area, and the infrastructure could affect the FEMA-designated floodplain or floodway. The Army would transfer the parcel with restrictions in the transfer document. The LRA might be required to obtain a state-issued Clean Water Act (CWA) Section 401 water quality certification or a waiver. The LRA also might be required to obtain a CWA Section 404 permit from the U.S. Army Corps of Engineers (USACE) for activities in floodplains, particularly those involving the discharge of dredge or fill material. Carroll County would require compliance with its floodplain ordinance for the natural encumbrance of the property being in a floodplain. The LRA would be required to conduct a floodplain determination study and prepare a floodplain management plan.

3.2 Wetlands

A 2024 wetland delineation identified 126.72 acres of wetlands on LRA Parcel 20, or about 96 percent of the parcel. Long-term adverse effects would be caused by any permanent loss of wetland from new construction and dredging in Commander's Pond and Brickhouse Slough.

To assist the LRA in understanding their obligations under the CWA with respect to activities that might affect wetlands, the Army would notify the LRA of their responsibility to adhere to CWA Section 404 permitting requirements for activities in or related to wetlands. Section 404 requires a permit from USACE for dredging and filling of wetlands. The LRA also might be required to obtain a state-issued CWA Section 401 water quality certification or a waiver. The LRA would need to obtain all required permits and develop specific mitigation measures in coordination with state and federal regulatory agencies.

4.0 Finding of No Practicable Alternative

I find that if the LRA's Reuse Plan was implemented, construction and dredging activity in Commander's Pond, Brickhouse Slough, and the Mississippi River main channel would be the only practicable alternative within the meaning of Executive Orders 11988 and 11990 for the LRA to create their proposed port on LRA Parcel 20. The LRA would be required to conduct a floodplain study to determine if and by how much proposed development would increase flood elevations and if there would be decreases in the 100-year floodplain storage capacity in the project area. Wetlands could be dredged or filled to accommodate development. Wetland and floodplain impacts would be minimized by the LRA implementing mitigation measures as required by USACE, state, and county permits.

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Date

Attachments:

- Figure 1. SVADA Location Map
- Figure 2. LRA Parcel 20 Map
- Figure 3. LRA Reuse Alternative Phase 1
- Figure 4. LRA Reuse Alternative Phase 2
- Figure 5. LRA Reuse Alternative Phase 3
- Figure 6. Floodplains and Wetlands Map

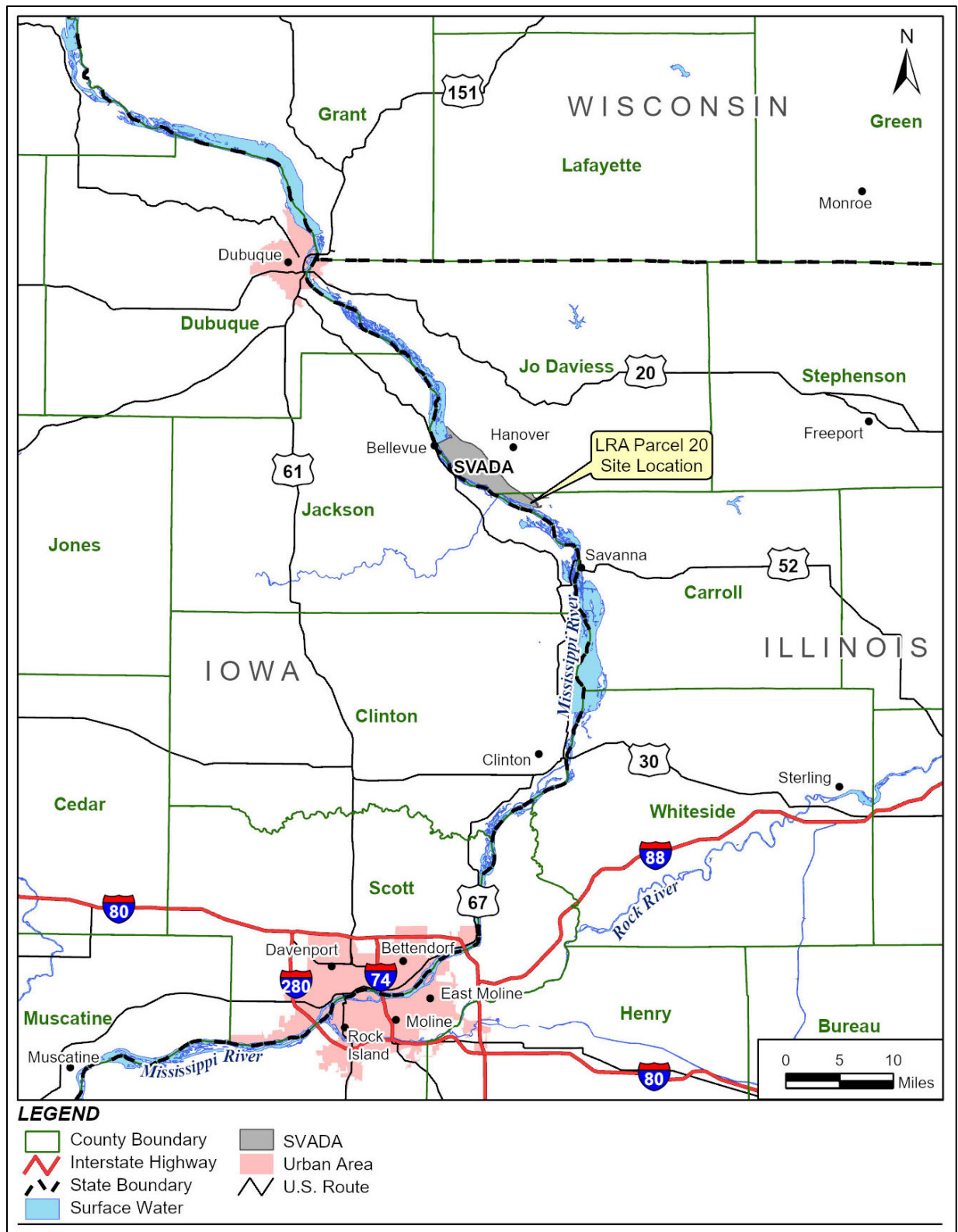


Figure 1. SVADA Location Map.



Figure 2. LRA Parcel 20 Map.

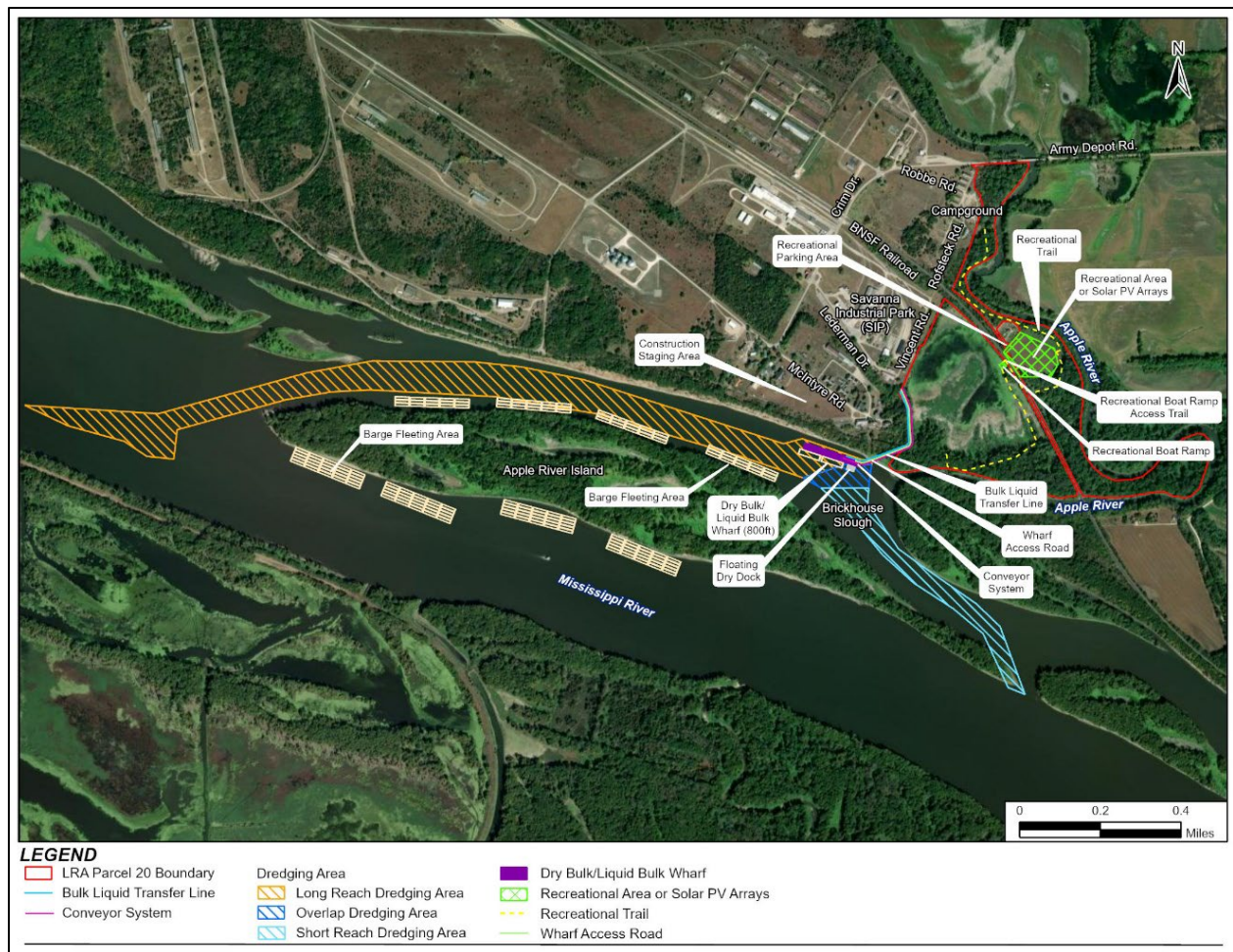


Figure 3. LRA Reuse Alternative Phase 1.

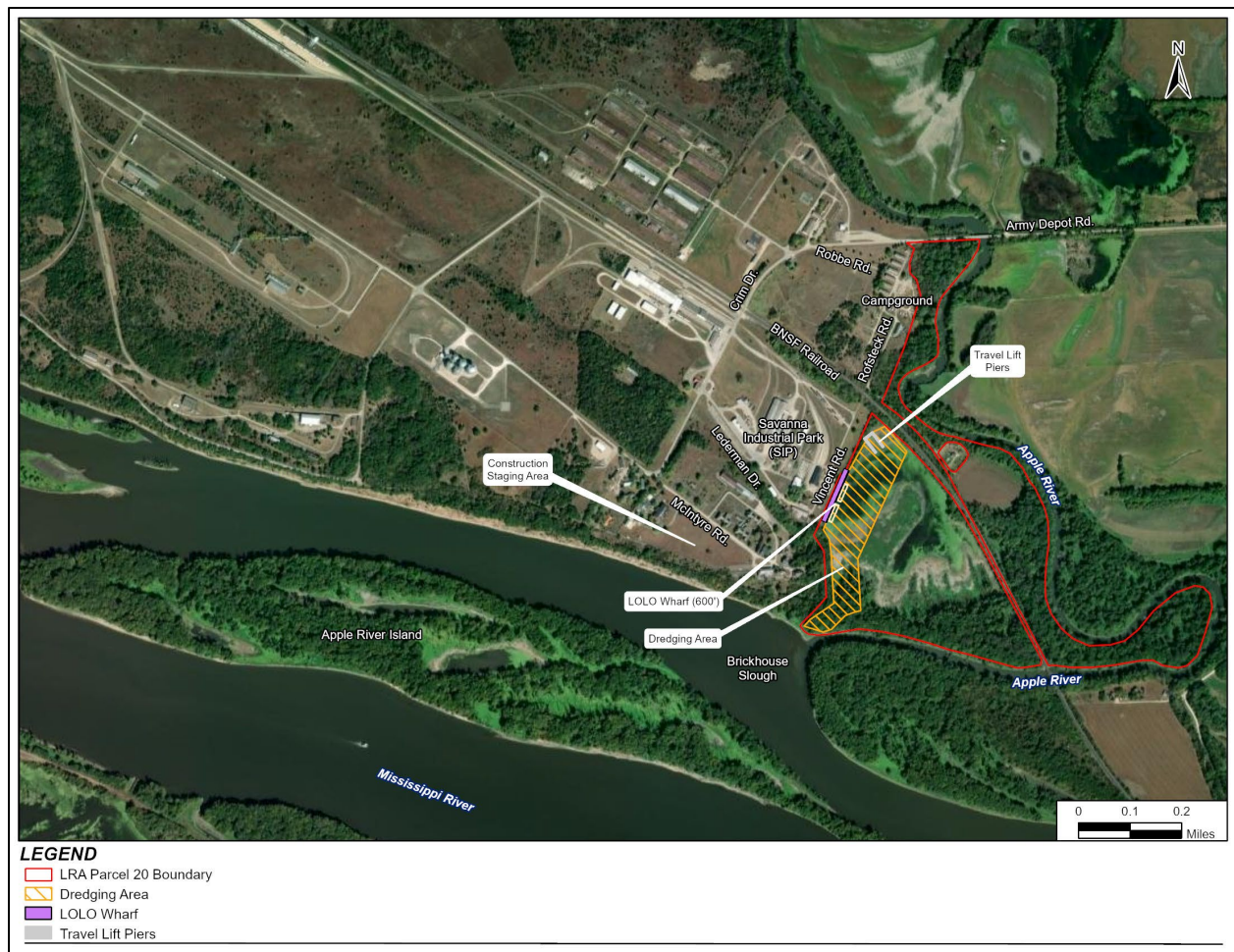


Figure 4. LRA Reuse Alternative Phase 2.

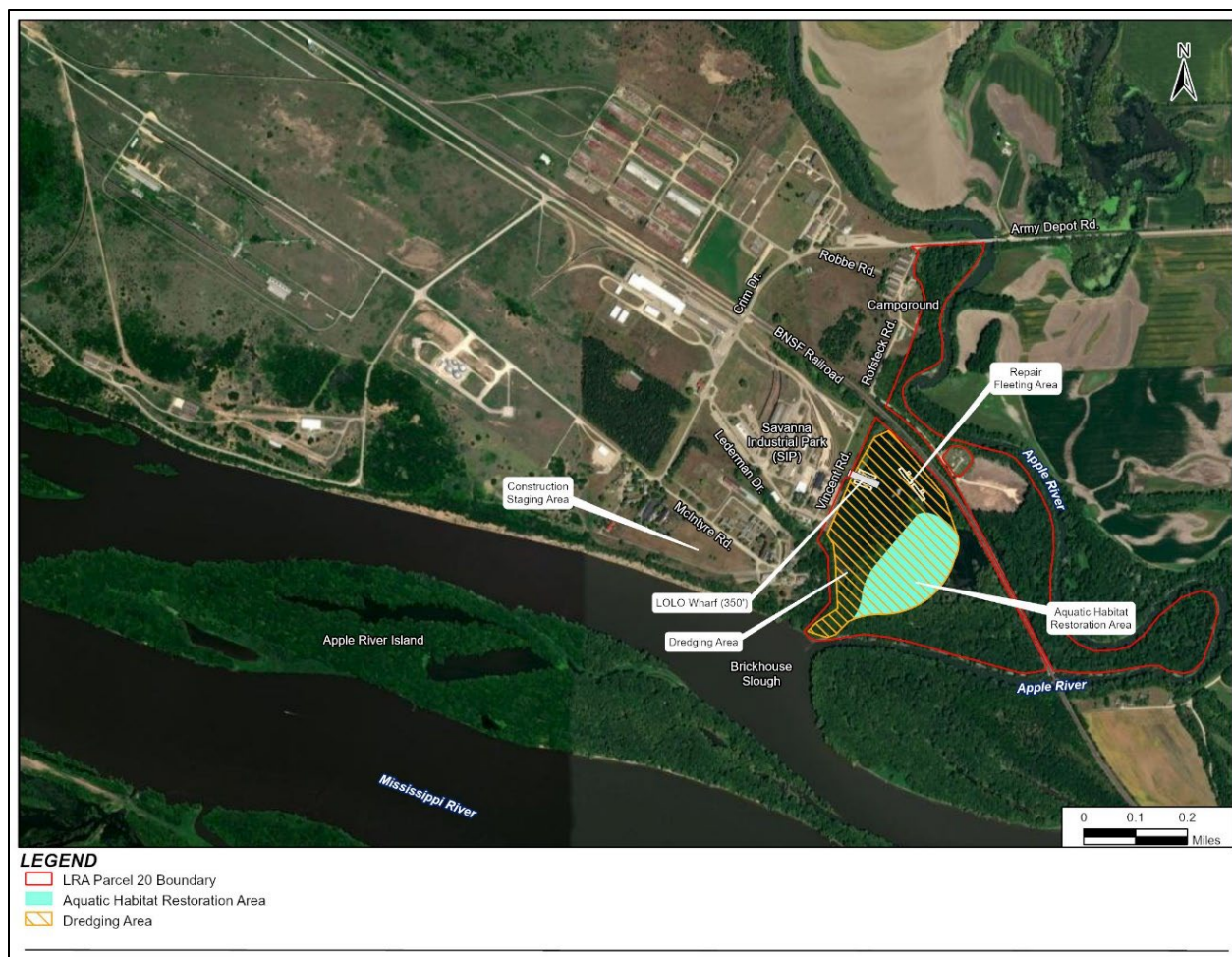


Figure 5. LRA Reuse Alternative Phase 3.

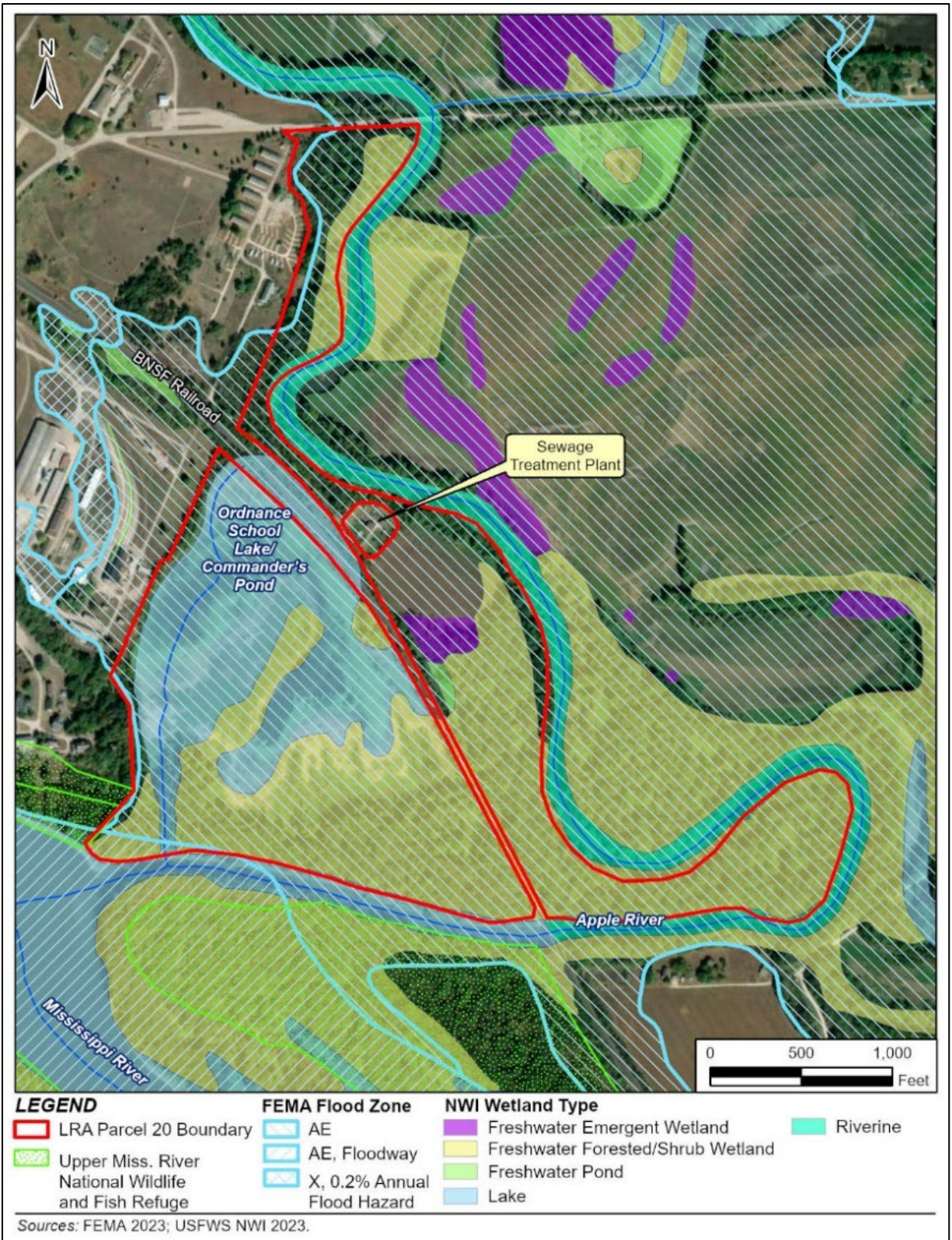


Figure 6. Floodplains and Wetlands Map.